



Comment Submitted by Anonymous

The is a Comment on the **Coast Guard (USCG) Notice: Information Collection Request to Office of Management and Budget; OMB Control Number: 1625-0030**

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Comment

This regulation, pertaining to requirement to notify the USCG for notification and to seek approval to transfer hazardous materials is grossly underestimated due to the fact that the regulations have been overcome by USCG reorganization, need for USCG HQ oversight is obsolete and that International standards now supersede US regulations. This entire rule and the paperwork required for it should be reconsidered.

156.210(b) General

(b) Lightering operations involving hazardous materials, other than oil, may be conducted only with the specific approval of the Commandant. A request to lighter hazardous materials, other than oil, must be submitted to Commandant (CG-5) prior to the planned beginning of lightering operations. The request must include the information described in 156.215(a) to the extent known, for the initial transfer, and the estimated frequency of subsequent lightering operations. After the entry into force of Annex II to MARPOL 73/78, vessels lightering hazardous materials shall carry an International Pollution Prevention Certificate for the Carriage of Noxious Liquid Substances in Bulk (1973), if required by Annex II to MARPOL 73/78, or equivalent documentation of compliance with the annex.

33 CFR 156.210

Lightering/ STS for chemicals should only require notification to local USCG Sector Commander, not approval from USCG HQ (CG-5) which does not even exist. This is a problematic regulation because no office at USCG HQ wants to take on this role and they don't have the technical or the operational expertise to tell a carrier yes or no. If the Vessel has the authority through their flag state and holds the proper documentation via a Certificate of Fitness, IOPP Cert & P&A Manual to carry and transfer these cargoes, then permission is not necessary, just Port State Control

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Submitter Information

Submitter Name:

Anonymous Anonymous