# Compliance Systems, Inc.

Maritime Regulatory Consultants

January 22, 2016
NTC 04-2016

**CSI NOTICE TO CLIENTS 04-2016:**

**SUBJECT: BURNING SLUDGE IN THE NORTH AMERICAN AND CARIBBEAN EMISSION CONTROL AREAS**

During recent U.S. Coast Guard inspections, questions have arisen regarding the permissibility of burning oil sludge containing more than 0.1% sulfur in the vessel's incinerator while in the North American or US Caribbean Sea Emission Control Area. MARPOL Annex VI does not prohibit the use of the incinerator to burn oil sludge when in the North American or US Caribbean Sea Emission Control Areas, except when in ports, harbors, or estuaries. Please see MARPOL Annex VI Regulation 16.4.

On February 11, 2014, the U.S. Coast Guard published Frequently Asked Questions: North American Emission Control Area (ECA) U.S. Coast Guard Office of Commercial Vessel Compliance, Rev. 11 Feb. 2014. One of the FAQs addressed this issue as follows:

**Do the ECA restrictions apply to waste oil sludge burned in incinerators? (10/31/2012 updated response)**
The use of an incinerator to incinerate sludge, including sludge with a sulfur content exceeding 1.00% generated on board ship is permitted by regulation 16 of MARPOL Annex VI, including within the ECA.

On January 13, 2016, the Environmental Compliance Coordinator with the U.S. Coast Guard Office of Commercial Vessel Compliance reconfirmed to CSI that at this time, MARPOL Annex VI does not prohibit the use of the incinerator to burn oil sludge when in the North American or US Caribbean Sea emission control areas, including sludge with a sulfur content exceeding 0.1%.

Hamilton House ♦26 E. Bryan Street ♦ Savannah, Georgia 31401 USA
Telephone: (912) 233-8181 ♦ Fax: (912) 231-2938
E-mail: csi@compliancesystemsinc.com ♦ Web site: www.compliancesystemsinc.com