

**[Summary of USCG Interim Final Rule published on 01 JULY 2009 in the Federal Register]**

**Consumer Price Index Adjustments of Oil Pollution Act of 1990 Limits of Liability—Vessels and Deepwater Ports**

On 1 July 2009 ([74 FR 31357](#)) the USCG issued an Interim rule that increased the limits of liability to reflect significant increases in the Consumer Price Index. More importantly for MODUs, this rule changed the regulations and removed the “double hull” label and further clarified that the single hull liability limits only apply to a tank vessel that is “constructed or adapted to carry, or carries, oil in bulk as cargo or cargo residue.” This means that MODUs without cargo tanks would now fall under the lower level limit of liability for tank vessels, which could reduce their premium for coverage.

<b>If the vessel is a --</b>	<b>The previous limits were the greater of--</b>	<b>The amended limits are the greater of--</b>
Oil cargo tank vessels greater than 3,000 gross tons with a single hull, including a single hull tank vessel fitted with double sides only, or a double bottom only	\$3,000 per gross ton or \$22,000,000	\$3,000 per gross ton or \$22,000,000
Tank vessels greater than 3,000 gross tons, other than vessels with a single-hull	\$1,900 per gross ton or \$16,000,000	\$2,000 per gross ton or \$17,088,000
Oil cargo tank vessel less than or equal to 3,000 gross tons with a single hull, including a single hull tank vessel fitted with double sides only, or a double bottom only	\$3,000 per gross ton or \$6,000,000	\$3,200 per gross ton or \$6,408,000
Tank vessels less than or equal to 3,000 gross tons, other than vessels with a single-hull	\$1,900 per gross ton or \$4,000,000	\$2000 per gross ton or \$4,272,000
Any vessel other than a tank vessel	\$950 per gross ton or \$800,000	\$1000 per gross ton or \$854,000