

MARINE ENVIRONMENT PROTECTION
COMMITTEE
62nd session
Agenda item 7

MEPC 62/7/4
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**INTERPRETATIONS OF, AND AMENDMENTS TO, MARPOL AND RELATED
INSTRUMENTS**

Suggested corrections to MEPC.1/Circ.736

**Submitted by Denmark, the Marshall Islands,
International Chamber of Shipping (ICS), BIMCO,
International Association of Independent Tanker Owners (INTERTANKO),
and Cruise Lines International Association (CLIA)**

SUMMARY

Executive summary: This document indicates the need for some minor clerical changes in MEPC.1/Circ.736 and justifies the proposed changes

Strategic direction: 2

High-level action: 2.0.1

Planned output: 2.0.1.12

Action to be taken: Paragraph 11

Related documents: MEPC.1/Circ.736; resolution MEPC.187(59); MEPC 61/7/1 and MEPC 61/24

1 MEPC.1/Circ.736 has been published on 8 November 2010 as a follow up to the decision of MEPC 61 to approve the "Guidance for the recording of operations in the Oil Record Book Part I – Machinery space operations (all ships)".

2 The co-sponsors of this submission recognize that the guidance through examples given in the document is excellent. Such guidance should be considered as the best advice given to ships, Flags and port State control officers.

3 However, the co-sponsors have noticed a few inconsistencies in the text of MEPC.1/Circ.736 which would require clerical changes only. The inconsistencies and the suggested corrections are listed below with direct reference to the number of the example in MEPC.1/Circ.736. The clerical changes are marked as follows: **added text** and **removed text**.

4 General Guidance, last bullet point:

- "The recording of general maintenance of items pertaining to the OWS remains voluntary and is **this is** not required to be recorded in the ORB".

5 Examples #10 and #13 – Additional words on the note for clarity

Example #10 – "Usage of Code D: Non-automatic **starting of** discharge overboard, **transfer** or disposal otherwise of bilge water which has accumulated in machinery spaces."

Example #13 – "Usage of Code E: Automatic **starting of** discharge overboard, **transfer** or disposal otherwise of bilge water which has accumulated in machinery spaces."

6 Example #16bis – There seems to be an editorial error in the second sentence of the Note to this example. The error seems to be the result of the copy and paste practice. This example addresses the record that should be made when the 15 ppm bilge separator is functional again, therefore, the seal should be removed. Therefore, correct text is provided below:

"Example #16bis

When proper operation of the Oily Filtering Equipment, Oil Content Meter or stopping device is restored

<i>Date</i>	<i>Code</i>	<i>Item No.</i>	<i>Record of operations/signature of officer in charge</i>
<i>dd-MONTH- yyyy</i>	<i>F</i>	<i>19</i>	<i>hh:mm (the same time as in example 16)</i>
		<i>20</i>	<i>hh:mm (the time the system is functional)</i>
		<i>21</i>	<i>[Reason for Failure, if known]</i>
			<i>signed: (Officer-in-charge, Name & Rank) dd-MONTH-yyyy</i>

Note: The condition of the oil filtering equipment also covers the alarm and automatic stopping devices, if applicable.

A code 'I' entry should also be made indicating that the overboard valve was **unsealed shut due to non working since the operation of the** Oil Filtering Equipment or Oil Content Meter **has been restored.**"

7 Example #17 on Usage of Code G: Accidental or other exceptional discharges of oil – It is suggested to include a couple of additional information to meet the latest amendments to the Oil Record Book as reflected in annex 3 to resolution MEPC.187(59).

"Example #17

Accidental Pollution

<i>Date</i>	<i>Code</i>	<i>Item No.</i>	<i>Record of operations/signature of officer in charge</i>
<i>dd-MONTH- yyyy</i>	<i>G</i>	<i>22</i>	<i>hh:mm</i>
		<i>23</i>	Place or <i>Position: xx deg xx min</i>
		<i>24</i>	Type and <i>Quantity of oily residue (if known)</i>
		<i>25</i>	<i>Circumstances of the discharge</i>
			<i>signed: (Officer-in-charge, Name & Rank) dd-MONTH-yyyy</i>

8 Examples #18 and #19 – The amendments to the Oil Record Book Parts I and II (annex 3 to resolution MEPC.187(59)) require that under H26.2 one has to record the "Time of bunkering". Therefore, under H26.2 in Examples #18 and #19 of MEPC.1/Circ.736 one has to add recording the time "(Start: dd-mm-yyy; hh:mm, Stop: dd-mm-yyy; hh:mm)" as shown below. The dates still need to be entered along with the start/stop times as bunkering operations can be carried out over more than one day or cover two dates, i.e. from PM to AM.

"Example #18

Bunkering of fuel oil

<i>Date</i>	<i>Code</i>	<i>Item No.</i>	<i>Record of operations/signature of officer in charge</i>
<i>dd-MONTH-yyyy</i>	<i>H</i>	<i>26.1</i>	<i>[Name of Port]</i>
		<i>26.2</i>	<i>Start dd-mm-yyyy- hh:mm Stop dd-mm-yyyy- hh:mm</i>
		<i>26.3</i>	<i>xxxx MT of ISO-xxxxx HFO x.x % S bunkered in tanks:</i>
			<i>aaaa MT added to [Tank Name & Designation] now containing bbbb MT</i>
			<i>cccc MT added to [Tank Name & Designation] now containing dddd MT</i>
			<i>signed: (Officer-in-charge, Name & Rank) dd-MONTH-yyyy</i>

Example #19

Bunkering of Bulk Lubricating oil

<i>Date</i>	<i>Code</i>	<i>Item No.</i>	<i>Record of operations/signature of officer in charge</i>
<i>dd-MONTH-yyyy</i>	<i>H</i>	<i>26.1</i>	<i>[Name of Port]</i>
		<i>26.2</i>	<i>Start dd-mm-yyyy- hh:mm Stop dd-mm-yyyy- hh:mm</i>
		<i>26.4</i>	<i>xx MT [Type of Oil] bunkered in tanks:</i>
			<i>xx MT added to [Tank Name & Designation] now containing xx MT</i>
			<i>signed: (Officer-in-charge, Name & Rank) dd-MONTH-yyyy</i>

9 Example #22 – Under Code H, "time of bunkering" is requested to be recorded (date and hour of initiation and completion). Therefore, the same record should apply to de-bunkering operations. With this in mind, it is suggested that, in Example #22, the "hh.mm" for the initiation and the completion of de-bunkering is added.

Example #22

De-bunkering of Fuel oil

<i>Date</i>	<i>Code</i>	<i>Item No.</i>	<i>Record of operations/signature of officer in charge</i>
<i>dd-MONTH- yyyy</i>	<i>I</i>		<i>xxxx MT of ISO-xxxxx HFO x.x % S de-bunkered from tanks:</i>
			<i>xxxx MT removed from [Tank Name & Designation] now containing xxx MT</i>
			<i>De-bunkered to "identity or name of receiver i.e. barge, tank truck or shore facility" in "Name of Port"</i>
			<i>Start dd-mm-yyyy; hh:mm Stop dd-mm-yyyy; hh:mm</i>
			<i>signed: (Officer-in-charge, Name & Rank) dd-MONTH-yyyy</i>

10 Example #24 – The co-sponsors suggest that in the third sentence of the Note, the correct entry should be Code "J" (not "O") of the Oil Record Book Part II.

"Example #24

Transfer of bilge water from tank listed in item 3.3 in the Supplement to the IOPPC to deck/cargo slop tank

Note: Requires this method listed in the IOPP Supplement under item 3.2.4.
If non-oil-cargo related oily residues are transferred to slop tanks of oil tankers, the discharge of such residues should be in compliance with regulation 34. (UI 22.1.1 for regulation 15).
Requires an entry in the Oil Record Book – Part II using code **(OJ)**.
If sludge or bilge water is transferred from multiple tanks in engine-room a separate entry must be made in ORB Parts I & II for each transfer."

Justification: This reference to the Note fits with Code J – *Collection, transfer and disposal of residues and oily mixtures not otherwise dealt with*, and the entry should be under J 57.3:

"J. 57 Method of transfer or disposal:
.1 ;
.2 ;
.3 transferred to or from (an) other tank(s) including transfer from machinery space oil residue (sludge) and oily bilge water tanks (identify tank(s); state quantity transferred and total quantity in tank(s), in m³); "

Action requested of the Committee

11 The Committee is invited to consider the changes suggested to MEPC.1/Circ.736 in this document and take action as appropriate.