

ENG CIRCULAR 18

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Sub: Maintenance and Inspection of Oil Filtering Equipment and Oil Content Meter Taking account of Port State Control Inspections. Of ships.

PURPOSE : All vessels registered in India are required to comply with MARPOL 73/78, Annex I, Regulations 9 and 16. No overboard discharges of oil or oily mixtures in excess of the concentration specified in Annex I of MARPOL 73/78 are authorized at any time except as permitted by Regulation 11 in Annex I of MARPOL 73/78.

SCOPE : Is applicable to every Oil Tanks of 150 tons gross tonnage and above, and every other ship of 400 tons gross tonnage and above.

BACKGROND : Due to numerous Port State Control (PSC) detentions of vessels on account of deficiencies in complying with the requirement of Annex I, of MARPOL 73/78 and the deficiencies are mainly the Oily Water Separators (OWS) have been found inoperative and/or fitted with by pass piping , directing illegal oily discharges overboard .

DESCRIPTION : In view of the above, this Directorate draws the attention of all Ship Owners, Managers, Masters and Surveyors/Inspectors to strictly comply with the requirement of Annex- I of MARPOL 73/78 : and additionally ensure followings :

GENERAL :

1. Ensure that the oily water separation, monitoring, and control equipment on board is operating in accordance with MARPOL. This includes the proper functioning of three way or re-circulating valves, monitoring and/or recording devices, and alarms and/or automatic shut down features.
2. Ensure that no illegal by-pass piping or other arrangements are provided in violation of, Regulation 9 and 16 of MARPOL 73 /78 , Annex - I
3. Ensure that the emergency bilge discharge valves and other overboard discharge valves of a similar nature that are normally closed are sealed in the closed position.
4. Ensure Bilge systems are maintained in accordance with the plans approved by the vessel's classification Society/D.G. Shipping
5. Ensure there is no excessive oil in the bilges and that cleaning substances which contain emulsifiers or other substances which may interfere with the proper operation of the monitoring and control systems are not being used.

Ensure Complete records are maintained for the shipboard transfer, storage, and disposition of oil and oily wastes, including sludge in holding tanks, bilge holding/separated oil tanks and by incineration;

6. Ensure all shore-side discharges of oil and oily wastes, including sludge, are supported by receipts which account for the amount and type of waste discharged as well as the date and place of discharge ;

7. Ensure the Oil Record Book is properly maintained and that it is checked for consistency with other shipboard log books. Repairs, testing, and routine maintenance of Oily Water Monitoring and Control System and Oil Filtering Equipment are to be duly noted in the oil Record Book.

TYPICAL TEST METHOD DURING PSC INSPECTION

1) to confirm zero ppm reading of the oil content meter when fresh water is supplied, through the meter

2) to sample the filtered water from the test cock of the oil filtering equipment or the outlet of the oil content meter in a cup with a bilge pump supplying bilge water to confirm no visible oil content;

3) to carry out an "opening-out" examination of the oil filtering parts and associated piping when the sampled water in 2) contains visible traces of oil;

4) to confirm the normal operation of the oil content meter taking account of the condition of the sampled water, where the meter is fitted;

Consequence of Non-compliance

Vessels that are not in compliance with the requirement of MARPOL are subject to followings

1. Immediate detention of the vessel and/or

2. Assessment of substantial fines and penalties as decided by D.G. Shipping/Port Authority and /or

3. Withdrawal of vessels certificate of registry and /or

4. Fine, Suspension or Withdrawal of certificate of competency of the concerned ships officer violating MARPOL

CONCLUSION : Everyday maintenance and inspection by the crew is indispensable in order to prevent occurrence of defects of the oil filtering equipment and oil content meter. MMD surveyors have been instructed to carry out stringent inspections so that the above PSC inspection was taken into account during survey for an IOPP certificate. In the mean time, please instruct the person who is engaged in management of ships to enhance maintenance and inspection of the oil filtering equipment and oil content meter in the periods between the surveys by surveyors. Enforcement of proper maintenance and inspection including cleaning or replacement of a filter shall be a very effective measure towards preparing for a PSC inspection. Please refer to the instruction manual of the manufacturer of the oil filtering equipment and oil content meter regarding methods of maintenance and inspection.