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COMMITTEE
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Agenda item 6

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**INTERPRETATION OF, AND AMENDMENTS TO, MARPOL
AND RELATED INSTRUMENTS**

Comments on the proposed interim Guidelines for recording of operations in the ORB

Submitted by INTERTANKO

SUMMARY

<i>Executive summary:</i>	This document comments on the proposed interim guidelines on recording of operations in the Oil Record Book, Part I as proposed in document MEPC 60/6
<i>Strategic direction:</i>	2
<i>High-level action:</i>	2.0.1
<i>Planned output:</i>	2.0.1.12
<i>Action to be taken:</i>	Paragraph 11
<i>Related document:</i>	MEPC 60/6

1 INTERTANKO appreciates and supports the initiative taken by Denmark in document MEPC 60/6 to propose interim Guidelines as a necessary step to assist seafarers in the recording of operations in the Oil Record Book, part I, in a uniform and correct manner.

2 INTERTANKO has over the last years issued its own Guidelines for Correct Entries in the ORB, part I. This has been constantly updated to follow the latest amendments approved by the Organization. Feedback received from the INTERTANKO Members, from some Administrations and from vetting inspectors, assisted us to further improve the guidelines. Based on this experience, INTERTANKO wishes to offer a number of comments, observations and suggestions to the proposed texts in the annex to document MEPC 60/6 as reflected in the following paragraphs. The comments/observations/suggestions recommend: (a) new text to be inserted in the “General” section of the proposed interim guidelines, (b) changes within the text quoted from the annex to document MEPC 60/6 and (c) other simple observations. The new text to be added is underlined and *in italics* (as we keep the entire original text quoted from MEPC 60/6) and the text suggested to be removed is ~~struck through~~.

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3 INTERTANKO suggests the following modifications to the “General” section of the guidelines:

- insert after the 2nd bullet point a new bullet point to read:
 - The entries in the Oil Record Book part I, for ships holding an International Oil Pollution Prevention Certificate, shall be at least in English, French or Spanish. Where entries in an official national language of the State whose flag the ship is entitled to fly are also used, this shall prevail in case of a dispute or discrepancy.
- in the 4th bullet point insert the word “incineration” so that the bullet point reads:
 - Oily garbage and used filters incineration shall be recorded in the Garbage Log-Book only.
- in the current 5th bullet point insert additional text to clarify that tamper proof seals are not a MARPOL Annex I requirement: also remove the second sentence.
 - Tamper proof seals used for non-MARPOL Annex I systems, i.e. sewage, food waste, etc., should not be recorded in the ORB as they are not a MARPOL Annex I requirement. ~~These can be entered in the Ship’s Log-Book or in a designated “seal log-book”.~~
- add two new bullet points:
 - Do not leave any full lines empty between successive entries
 - Upon completion of each operation the proper entries shall be completed. Do not wait until the end of the week or on completion of each voyage to enter records in the ORB. In this way errors and omissions are avoided.

4 INTERTANKO suggests the following modifications to examples for guidance given on various Oil Record Book Codes entries:

5 On page 1 of the annex to document MEPC 60/6:

Usage of code C.11: Collection of oil residues (sludge)

Weekly inventory of oil residues (sludge) tanks (tank listed under item 3.1 in the Supplement to the IOPP Certificate)

Date	Code	Item No.	Record of operation and signature of officer in charge
dd-mm-yyyy	C	11.1	[Name of sec 3.1 Tank & Designation]
		11.2	total capacity xxx m ³
		11.3	xx m ³
			signed: (Officer-in-charge, Name & Rank) dd-mm-yyyy
dd-mm-yyyy	C	11.1	[Name of sec 3.1 Tank & Designation]
		11.2	total capacity x m ³
		11.3	x m ³
			signed: (Officer-in-charge, Name & Rank) dd-mm-yyyy

INTERTANKO suggests that:

- the words “total capacity” be removed from C.11.2 since this is clear by using C.11.2.

- there is no need to date each signature because the date is already recorded in the ORB.
- It would be advisable to suggest that, in addition to the initial C.11.1 and C.11.2 entries, these entries should be updated weekly (keeping reference to the initial entry). Feedback received from INTERTANKO members indicate that PSC officers have different interpretations to such records. Therefore, guidance from IMO that C.11.1 and C.11.2 are recorded once in the beginning of ORB and then updated each week would be very useful in streamlining the understanding of such records.

Recording of oil residue (sludge) collected by manual operation in oil residue (sludge) tank (tank listed under item 3.1 in the Supplement to the IOPP Certificate)

<i>Date</i>	<i>Code</i>	<i>Item No.</i>	<i>Record of operation and signature of officer in charge</i>
<i>dd-mm-yyyy</i>	<i>C</i>	<i>11.1</i>	<i>[Name of sec 3.1 Tank & Designation]</i>
		<i>11.2</i>	<i>total capacity xxx m³</i>
		<i>11.3</i>	<i>xx m³</i>
		<i>11.4</i>	<i>xx m3 collected from [identification of source]</i>
			<i>signed: (Officer-in-charge, Name & Rank) dd-mm-yyyy</i>

Note: Operator initiated manual collection (not transfer with a pump), where oil residue (sludge) is ~~transferred~~ collected into the oil residue (sludge) tank(s). Examples of such operations could be:

~~Collection of oil residue (sludge) from fuel oil separator drain tanks. –~~

~~Collection of oil residue (sludge) from cleaning of a fuel or lube oil tank.~~

~~Collection of oil residue (sludge) by draining engine sump tanks.~~

~~Adding fuel oil to an oil residue (sludge) tank.~~

~~Collection of sludge from bilge water holding tanks – in this case a disposal entry for bilge water is also needed, the quantity retained in the bilge water holding tanks should be recorded in this field.~~

INTERTANKO suggests the following to the Note of this example:

- add, for clarifications, some text to the chapeau text of the note.
- remove the first example given. Fuel oil separator drain tanks are small “tanks”, normally less than 500 litres. They are drained on a daily basis to the sludge tanks listed in section 3.1 of the Supplement of the IOPPC, the content of which is recorded on a weekly basis. If this line is not removed, the work burden related to the ORB will be drastically increased. There is no need for that increase, and possibly induce confusion in ORB entries, since the contents of these small drain tanks are included in C.11.1-2-3. It is also worth mentioning that the details of these tanks are not normally recorded in the IOPPC. Therefore, if such records are to be requested, then a number of complications will arise. We do not see that this note relates to the case when such tanks are drained by using a pump. For these cases C.11.4 is not applicable since a C.12.2 entry must be made.
- add a new first example.
- some text changes in the last given example which are aimed to avoid duplication of entries.

6 On page 2 of the annex to document MEPC 60/6:

Usage of code C.12: Disposal or Transfer of oil residues (sludge)

Transfer from one oil residue (sludge) tank to another oil residue (sludge) tank, both listed under item 3.1 in the Supplement to the IOPP Certificate

Date	Code	Item No.	Record of operation and signature of officer in charge
dd-mm-yyyy	C	12.2	$x \text{ m}^3$ sludge transferred from [Name of sec 3.1 Tank & Designation] now $xx \text{ m}^3$
			total capacity $xxx \text{ m}^3$
			to [Name of sec 3.1 Tank & Designation] now $x \text{ m}^3$ of total capacity $x \text{ m}^3$
			signed: (Officer-in-charge, Name & Rank) dd-mm-yyyy

- suggest again that the capacity of sludge tanks should not be recorded for C.12.x entries.

Regeneration of fuel oil from oil residue (sludge)

Date	Code	Item No.	Record of operation and signature of officer in charge
dd-mm-yyyy	C	12.4	$xx \text{ m}^3$ sludge disposed by regeneration of $x \text{ m}^3$ fuel in [Fuel Tank & Designation] and $x \text{ m}^3$ of water in [Name of sec 3.3 Tank & Designation]
			signed: (Officer-in-charge, Name & Rank) dd-mm-yyyy

~~Note: Regenerated fuel oil shall not be used in a Sulphur ECA unless the ship operates entirely within such an area.~~

INTERTANKO suggests to remove this Note because it is not related to the ORB entries.

7 On page 3 of the annex to document MEPC 60/6:

Usage of code D: Non-automatic starting of discharge overboard, transfer or disposal otherwise of engine-room bilge water

Date	Code	Item No.	Record of operation and signature of officer in charge
dd-mm-yyyy	D	13	$x \text{ m}^3$ bilge water from engine-room bilge wells
		14	Start: dd-mm-yyyy stop: dd-mm-yyyy
		15.3	To [Name of sec 3.3 Tank & Designation], now $xx \text{ m}^3$
			signed: (Officer-in-charge, Name & Rank) dd-mm-yyyy

INTERTANKO suggests that under D.14, the time of start/stop must be included.

Pumping of bilge water from engine-room bilge wells to a tank listed under item 3.3 in the Supplement to the IOPP Certificate

Date	Code	Item No.	Record of operation and signature of officer in charge
dd-mm-yyyy	D	13	$x \text{ m}^3$ bilge water from, [Name of sec 3.3 Tank & Designation], now $xx \text{ m}^3$
		14	Start: dd-mm-yyyy stop: dd-mm-yyyy
		15.3	To [Name of sec 3.3 Tank & Designation], now $xx \text{ m}^3$
			signed: (Officer-in-charge, Name & Rank) dd-mm-yyyy

INTERTANKO suggests that the capacity of the bilge water holding tank should be stated in D.13.

Pumping of bilge water overboard from tank listed in item 3.3 in the Supplement to the IOPP Certificate

<i>Date</i>	<i>Code</i>	<i>Item No.</i>	<i>Record of operation and signature of officer in charge</i>
<i>dd-mm-yyyy</i>	<i>D</i>	<i>13</i>	<i>xx m³ bilge water from [Name of sec 3.3 Tank & Designation]</i>
			<i>capacity xxx m³, now xx m³</i>
		<i>14</i>	<i>Start: dd-mm-yyyy, hh:mm stop: dd-mm-yyyy, hh:mm</i>
		<i>15.1</i>	<i>Through 15 ppm equipment overboard</i>
			<i>Position start: xx deg xx min N/S, xx deg xx min E/W</i>
			<i>Position stop: xx deg xx min N/S, xx deg xx min E/W</i>
			<i>signed: (Officer-in-charge, Name & Rank) dd-mm-yyyy</i>

INTERTANKO suggests that an additional example for “Pumping of bilge water overboard through the 15 ppm OWS with suction from engine room bilges” must be added.

8 On page 5 of the annex to document MEPC 60/6:

***Usage of code G: Accidental or other exceptional discharge of oil
15 ppm alarm system failure***

<i>Date</i>	<i>Code</i>	<i>Item No.</i>	<i>Record of operation and signature of officer in charge</i>
<i>dd-mm-yyyy</i>	<i>G</i>	<i>22</i>	<i>hh:mm</i>
		<i>23</i>	<i>Position: xx deg xx min</i>
		<i>24</i>	<i>x Litre oily residue</i>
		<i>25</i>	<i>[Reason for Failure]</i>
			<i>signed: (Officer-in-charge, Name & Rank) dd-mm-yyyy</i>

Code letter G is related to an accidental oil discharge (i.e. an oil spill at sea during bunkering). Therefore, it should not be related to a 15 ppm alarm failure, which in any case should be recorded with code letter F. Therefore, this example should either be deleted or another example of accidental oil discharge provided (i.e. accidental oil discharge during bunker tank overflow).

***Usage of code H: Bunkering of fuel or bulk lubricating oil
Bunkering of Fuel oil***

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

INTERTANKO suggests that recording of the sulphur content is not required, since such is mentioned in the BDN and it is a MARPOL Annex VI requirement.

9 On page 6 of the annex to document MEPC 60/6 – INTERTANKO suggests that all records on this page, with the following headings, are not mandatory. Records should be made in accordance with the ISM system on board, the PMS records or on the deck and engine log-books respectively. Therefore, it is suggested that all these records should be removed from this interim Guidelines as unnecessary duplication of records.

- *Routine maintenance of Oily Water Separator;*
- *Periodic check of Oil Content Meter and Stopping Device;*

- *Repair and maintenance of any other part of the MARPOL Annex I Engine-Room related pollution prevention equipment(s) and system(s);*
- *Optional sealing of MARPOL Annex I related valve and/or equipment;*
- *Breaking of optional seal on MARPOL Annex I related valve and/or equipment; and*
- *Entry pertaining to the crossing of the International Date Line.*

10 On page 7 of the annex to document MEPC 60/6:

Entry pertaining to an earlier missed operational entry

<i>Date</i>	<i>Code</i>	<i>Item No.</i>	<i>Record of operation and signature of officer in charge</i>
<i>dd-mm-yyyy (1)</i>	<i>I</i>		<i>Entry pertaining to an earlier missed operational entry</i>
			<i>xx m³ bilge water from Cargo Hold bilge holding tank</i>
			<i>to clean bilge tank</i>
			<i>signed: (Officer-in-charge, Name & Rank) dd-mm-yyyy (2)</i>

INTERTANKO suggests that such an entry has legal consequences and therefore needs careful consideration. Instead of the procedure suggested in MEPC 60/6, INTERTANKO Guide for Correct Entries offers the following alternative for correction of wrong entries:

If a wrong entry has been recorded in the ORB, it should immediately be struck through by a single line in such a way that the wrong entry is still legible. The wrong entry will be signed and the new correct entry will follow.

However, if a serious mistake is discovered at a later stage, contemporaneous evidence is needed to prove that such an entry was wrong, and that it was an innocent mistake.

It is not permitted to leave any full lines empty between each entry. When an entry is made and the whole line is not completed, this line is not a “full line entry”, and it is permitted to make another entry on the next line.

INTERTANKO suggests that the text above is added to the “General” section of the proposed interim Guidelines to replace the current suggested procedure.

Tankers with slop tanks

Transfer of sludge from engine-room oil residue (sludge) tank to deck slop tank

<i>Date</i>	<i>Code</i>	<i>Item No.</i>	<i>Record of operation and signature of officer in charge</i>
<i>dd-mm-yyyy</i>	<i>C</i>	<i>12.4</i>	<i>xx m³ sludge from [Name of sec 3.1 Tank & Designation] now x m³</i>
			<i>Transferred to Deck Slop Tank [designation]</i>
			<i>signed: (Officer-in-charge, Name & Rank) dd-mm-yyyy</i>

INTERTANKO suggests that this example should be transferred together with the other C examples.

Action requested of the Committee

11 The Committee is invited to consider the observations and comments above and take action as appropriate.