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INTERPRETATIONS OF, AND AMENDMENTS TO, MARPOL AND RELATED INSTRUMENTS

Oil discharge monitoring and control systems for oil tankers

Submitted by OCIMF and INTERTANKO

SUMMARY

Executive summary:	This document contains technical arguments against the proposal in document MEPC 59/6/4 (Denmark) and advises there has been no demonstrated or compelling need submitted to justify amending MARPOL Annex I or resolution MEPC.108(49)
Strategic direction:	7.1
High-level action:	7.1.2
Planned output:	-
Action to be taken:	Paragraph 10
Related documents:	MEPC 59/6/4; resolution MEPC.108(49); MEPC 58/6/2 and DE 52/WP.7

Introduction

1 This document is submitted in accordance with the provisions of paragraph 4.10.5 of the Guidelines on the organization and method of work of the Maritime Safety Committee and the Marine Environment Protection Committee and their subsidiary bodies (MSC-MEPC.1/Circ.2) and comments on document MEPC 59/6/4.

2 Document MEPC 59/6/4 has been submitted advocating elimination of the MARPOL provision for manual operation of the Oil Discharge Monitoring and Control System (ODME) in the event of equipment failure during the sea voyage. This submission is similar to previous submissions by Denmark to the DE Sub-Committee and MEPC 58. However, no evidence has been presented that manual operation of the ODME, as permitted by regulation 31 of MARPOL Annex I and in accordance with the guidelines developed by the Organization, has resulted in an uncontrolled release of oil from cargo or slop tanks. OCIMF made an intervention

at DE 52, supported by many delegations, opposing changes to MARPOL Annex I or resolution MEPC.108(49) as unfounded.

Background

3 Current restrictions on use of ODME in manual mode is contained in regulation 31 of MARPOL Annex I. The Annex specifically permits a manually operated alternative for decanting of water from cargo/slop tanks in the event of a failure of the oil discharge monitoring and control equipment required on oil tankers. Obviously, this is an abnormal condition and requires serious consideration by the operator before proceeding. However, the regulators involved in writing these regulations clearly recognized the practical considerations of the ODME equipment failure, especially for large tankers that need to tank clean or to ballast cargo tanks. Although ballasting of cargo tanks is more limited now with double hull tanker designs, it is still required in many cases to obtain "heavy weather" condition and maintain the safety of the tanker.

4 Oil tanker operators have clear instructions on operation of such equipment, instructions for alternative manual methods in the event of ODME equipment failure, instructions for reporting requirements to the company and flag State authorities in the event of the equipment failure, and the requirement that the equipment be repaired before departing to the next port. As an example of the alternative manual methods, determination of the oil/water interface and maintaining sufficient cushion of water below the interface above the pump suction (regulation 32) to prevent inadvertent release of oil is a strict requirement.

5 The ODME does not treat or filter the water discharged overboard. It only monitors the discharged water for oil content for which visual observation can effectively detect. Generally, these water decanting operations follow tank cleaning or ballasting of cargo tanks (heavy weather ballasting of cargo tanks in doubled hull tankers sometimes permitted). It is to be recalled that tanks that are ballasted for "heavy weather" conditions have already been crude oil washed, thereby removing the vast majority of residue oil from the tank and thereby rendering the large water volume in the cargo tank nearly free from oil. The large amounts of water used in these operations can give the ship operator serious problems if they cannot be managed in a reasonable way. Most terminals do not have the capacity for processing these large quantities of water ashore in the event of an ODME failure. Therefore, practical alternatives may be employed in the event of the ODME failures, provided an equivalent level of operational control can be maintained (risk assessment based on operational conditions, i.e. type of oil, length of settling time, quantity, weather, etc.).

6 At DE 52, the Sub-Committee considered document MEPC 58/6/2 (Denmark), suggesting that paragraph 6.11.1.1 of the "Revised Guidelines and specification for oil discharge monitoring and control systems for oil tankers" should be deleted so as to avoid any uncontrolled discharge of oil, and in order to ensure compliance with MARPOL Annex I requirements. In the ensuing debate, sympathy was shown for the concerns of Denmark, although it was pointed out by several delegations that, in the event of failure of the oil discharge monitoring and control system, regulation 31.1 of MARPOL Annex I allows for a manually operated alternative method to be used, provided the defective unit is made operable as soon as possible; and that paragraph 6.11.1.1 of the Revised Guidelines and Specifications explained how such manual operation could be carried out as a pragmatic alternative in case of breakdown of the oil content meter or sampling system.

7 Good tanker practice prescribes visual monitoring of the overboard discharge content, whether or not control is through automatic or manual operation. Visual observation is a valid method of oil detection. In MARPOL Annex I, visual observation is required under provisions in regulations 30 and 31.

8 Regulation 31 clearly states "In the event of failure of the oil discharge monitoring and control system a manually operated alternative method may be used, but the defective unit shall be made operable as soon as possible. Subject to allowance by the port State authority, a tanker with a defective oil discharge monitoring and control system may undertake one ballast voyage before proceeding to a repair port."

Conclusions

9 The position of OCIMF and INTERTANKO has been that the existing regulations are adequate and fit for purpose. Oil tanker operators have clear instructions on operation of such equipment and instructions for alternative manual methods in the event of ODME equipment failure as prescribed in regulation 31.4. The co-sponsors believe that the proposal in document MEPC 59/6/4 to amend resolution MEPC.108(49) is not justified and it seems to be contrary to the current MARPOL Annex I regulations, which clearly permit manual operation in the event of equipment failure.

Action requested of the Committee

10 The Committee is invited to take note of the information provided and take action as appropriate.

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