



TECHNICAL ALERT No. 14-19

PSC Inspection Deficiencies - Oily Water Separator and 15ppm Oil Content Meter

1. Introduction

- 1.1. The Bahamas Maritime Authority (BMA) wishes to bring to the attention of Companies operating Bahamian ships a number of recent Port State Control (PSC) inspections, where serious deficiencies affecting continued compliance with MARPOL Annex I resulted in a Port State Control detention.
- 1.2. This Technical Alert aims to increase ship owners' and operators' awareness of common PSC inspection findings relating to MARPOL Annex I.

2. Port State Control and MARPOL Annex I compliance verification

- 2.1. Compliance with MARPOL Annex I is viewed as one the most common control subjects of any Port State Control (PSC) regime. The United States Coast Guard (USCG) in particular pays keen attention to a ship's compliance with MARPOL Annex I requirements and pollution prevention.
- 2.2. During 2014, to date, there have been 3 serious incidents in the USA where members of the engine room crew were unable to demonstrate the following to the Port State Control Officer (PSCO):
 - i. Correct operation of the Oily Water Separator (OWS);
 - ii. How to conduct the 15ppm oil content monitor function test;
 - iii. Effective OWS operation when taking suction from respective bilge holding tank; and,
 - iv. In one case, the OWS being unable to produce an effluent with oil content below 15ppm for over 1.5 hours, despite constant attempts by the ship's engineers to improve its operation.

- 2.3. On a number of other occasions PSC deficiencies have been raised relating to calculation of OWS pumping rate in the Oil Record Book (ORB) Code D15.4 entries. The net discharge rate should not be greater than the maximum approved OWS discharge rate as stated within the IOPP Certificate Supplement (Form A or Form B) or on the type approval certificate for the OWS. If the discharge rate is greater than the maximum approved OWS discharge rate, the OWS may not be operating correctly.
- 2.4. Similar caution should be exercised when determining actual oil residue quantity disposed of by incineration and where the OWS and the incinerator have flowmeters installed to indicate the quantity of oil residues being disposed of.
- 2.5. Deficiencies indicated in 2.2 and 2.3 above may be indicative of failings in the effectiveness or implementation of the company's Safety Management System, which could lead to requests for additional external audits by PSC prior to the ship being allowed to depart port.
- 2.6. The BMA recommends that the following steps be considered by the company to enhance engine room crew members' awareness of OWS and 15ppm oil content monitor operations and the ORB procedures:
 - i. Produce a set of clear instructions for Chief Engineers and other Engineering Officers with regards to correct and consistent entries in Oil Record Book;
 - ii. Produce a ship-specific set of instructions addressing correct OWS operation and include same within the on board training program for all engine room crew;
 - iii. Include bilge holding tank internal inspection and cleaning, where necessary, in the ship's planned maintenance system;
 - iv. Include OWS and 15ppm oil content monitor operational tests in the ship's planned maintenance system. Should such tests be unsuccessful, the BMA and ships Classification Society should be informed immediately so that suitable short term arrangements can be put in place, in order to mitigate potential PSC sanctions;

2.7. Companies and Masters are reminded that, as per the requirements of Regulation 6.4.3 of MARPOL Annex I, should any defect be discovered which substantially affects the efficiency or completeness of the ship's equipment covered by MARPOL Annex I, the master or owner shall report the nature of the defect to :

- i. The BMA;
- ii. The ship's Classification Society;
- iii. The appropriate authorities of the port state of any port the ship may be calling.

See also paragraph 4.2 of BMA Information Bulletin No.85.

3. Validity

3.1. This alert is valid until further notice.

4. Revision History

Rev.0 (30 September 2014) – First issue