

MARINE ENVIRONMENT PROTECTION
COMMITTEE
75th session
Agenda item 10

MEPC 75/10/4
25 September 2020
Original: ENGLISH
Pre-session public release:

POLLUTION PREVENTION AND RESPONSE

Comments on document MEPC 75/10/Add.1, paragraph 3.6

Submitted by IACS

SUMMARY

Executive summary: This document proposes modifications to the draft MEPC circular on 2020 Guidelines for systems for handling oily wastes in machinery spaces of ships incorporating guidance notes for an integrated bilge water treatment system (IBTS) (2020 IBTS Guidelines) as set out in annex 13 to document PPR 7/22/Add.1

Strategic direction, if applicable: 2

Output: 2.13

Action to be taken: Paragraph 8

Related documents: MEPC 75/10; PPR 7/22 and PPR 7/22/Add.1

Introduction

1 This document provides comments on the action requested of the Committee in paragraph 3.6 of document MEPC 75/10/Add.1 and is submitted in accordance with paragraph 10 of Circular Letter No.3985/Rev.1 on Resumption of the seventy-fifth session of the Marine Environment Protection Committee (16 to 20 November 2020).

2 PPR 7 requested the Committee to consider the draft MEPC Circular on 2020 Guidelines for systems for handling oily wastes in machinery spaces of ships incorporating guidance notes for an integrated bilge water treatment system (IBTS) (2020 IBTS Guidelines) as set out in annex 13 to document PPR 7/22/Add.1, and decide on whether it, among others, can be approved. This request appears as action item 3.6 of document MEPC 75/10/Add.1.

Discussion

3 IACS offers comments and proposals regarding the following three elements of the draft MEPC Circular.

Integral pump

4 Paragraph 6.3 of the annex to the draft MEPC Circular states:

"If an integral pump is fitted, the discharge should not bypass the 15 ppm bilge separator."

5 IACS considers that it should be clarified to which system the integral pump is connected to, if fitted. To introduce that clarity, the following modification is proposed.*

"If an integral pump is fitted for discharging oily bilge water, the discharge should not bypass the 15 ppm bilge separator, except discharging oily bilge water ashore through the standard discharge connection as required by regulation 13 of MARPOL Annex I."

Appendix 1: alignment of paragraph 4.3.2 with figure 2

6 To align with figure 2, IACS proposes the amendment of paragraph 4.3.2 of appendix 1 of the draft 2020 IBTS Guidelines as follows:

"4.3.2. Clean bilge water that has been processed through the oil filtering equipment may be discharged directly overboard, through a 15 ppm bilge alarm combined with an automatic stopping device. In cases where such clean bilge water is stored in a clean bilge holding tank, it may only be discharged through the 15 ppm bilge alarm combined with an automatic stopping device by means of a separate clean bilge water pump."

Application of sections 4.5 and 4.6 of appendix 1

7 IACS considers that provisions contained in sections 4.5 and 4.6 of appendix 1 apply to all ships regardless of whether they are fitted with IBTS (e.g. fuel oil regeneration is not shown on figure 2). As such, IACS proposes to move these sections (4.5 and 4.6 of appendix 1) to the end of section 7, Systems for separated sludge, of the annex of the draft 2020 Guidelines and renumber these sections as 7.1.9 and 7.1.10, respectively.

Action requested of the Committee

8 The Committee is invited to consider the foregoing, in particular the proposals in paragraphs 5, 6 and 7, and take action as appropriate.

* Here and throughout the text, tracked changes are indicated using "strikeout" for deleted text and "grey shading" to highlight new insertions.