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Agenda item 9

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POLLUTION PREVENTION AND RESPONSE

Comments on the draft 2017 Guidelines for discharge of exhaust gas recirculation (EGR) bleed-off water

Submitted by IACS

SUMMARY

Executive summary: This document proposes improvements to the text of the draft 2017 *Guidelines for the discharge of exhaust gas recirculation (EGR) bleed-off water*, which were finalized at PPR 4 and forwarded to MEPC 71 with a view to adoption. The document also identifies and discusses some issues for further consideration.

Strategic direction: 7.3

High-level action: 7.3.1

Output: 7.3.1.9

Action to be taken: Paragraph 11

Related documents: MEPC 71/9; PPR 4/WP.6 and PPR 4/21

Introduction

1 This document is submitted in accordance with the provision of paragraph 6.12.5 of MSC-MEPC.1/Circ.5 "*Guidelines on the organization and method of work of the Maritime Safety Committee and the Marine Environment Protection Committee and their subsidiary bodies*" and provides comments on paragraph 2.12 of document MEPC 71/9 regarding the draft 2017 *Guidelines for the discharge of exhaust gas recirculation (EGR) bleed-off water* (draft Guidelines), which were finalized at PPR 4 and forwarded to MEPC 71 with a view to adoption.

2 This document proposes textual improvements regarding the application of the draft Guidelines and discusses other issues with a view to facilitating the global and consistent implementation of the Guidelines.

Proposals

3 IACS considers that the text of paragraph 1.1 should be clarified as follows, so as to accommodate the new Emission Control Areas (ECAs) in the Baltic Sea and North Sea, which are expected to have different "construction" application dates than for the North American ECA and the United States Caribbean Sea ECA (additions/deletions):

"1.1 Regulation 13.5.4 of MARPOL Annex VI requires marine diesel engines on ships constructed in 2016 and later to meet the Tier III NO_x emission levels when operating in a NO_x Emission Control Area in accordance with the provisions in paragraphs 5.1 and 5.2."

4 Recording requirements are specified in section 7 of the *2015 Guidelines for exhaust gas cleaning systems* (2015 EGCS Guidelines) (resolution MEPC.259(68)). However, such requirements are not mentioned in the *Revised Guidelines and Specifications for Pollution Prevention Equipment for Machinery Space Bilges of Ships* (resolution MEPC.107(49), as amended by resolution MEPC.285(70)). Consequently, the relevant description in paragraph 2.3.4 should be modified as shown below (additions/deletions):

"2.3.4 "EGR record book" means a record of the maintenance and servicing of the monitoring equipment required by these Guidelines. This may be met by following the relevant requirements of the EGCS Guidelines, ~~or the Revised Guidelines and Specifications for Pollution Prevention Equipment for Machinery Space Bilges of Ships (resolution MEPC.107(49)), as amended by resolution MEPC.285(70), as appropriate.~~ This record would include the date, time, location and quantity of residues delivered ashore from the EGR water treatment system or may be recorded in the EGCS Record Book."

5 The manuals for exhaust gas recirculation (EGR) systems are not mentioned in the draft Guidelines. However, it is noted that equivalent manuals are defined and referred to in the 2015 EGCS Guidelines. IACS believes this omission in the draft Guidelines is an oversight that should be addressed before the text is adopted. The following definition of the term "manual for EGR bleed-off discharge system" is proposed as a new paragraph 2.3.5 of the draft Guidelines (additions/deletions):

2.3.5 "Manual for EGR bleed-off discharge system" means the manual containing the system description, discharge limits and the relevant items required for OMM in the EGCS Guidelines or the Revised Guidelines.

6 It is specified in paragraph 3.1.1 of the draft Guidelines that "... this discharge to the sea should be documented ...". IACS considers that this provision needs further clarification, since the relevant documentation for EGCS and EGR bleed-off discharge systems are not identical. Therefore, IACS proposes the addition of a new paragraph 2.4 of the draft Guidelines as follows (additions/deletions):

2.4 Required documents

The EGR record book and manual for EGR bleed-off discharge system should be approved by the Administration. The following documents should be retained on board the ship as appropriate and should be available for surveys as required:

.1 manual for EGR bleed-off discharge system;

- .2 certificates for type approval of oil filtering equipment (15 ppm bilge separator);
- .3 certificates for type approval of oil content meters (15 ppm bilge alarm);
- .4 operating and maintenance manuals of oil filtering equipment (15 ppm bilge separator);
- .5 operating and maintenance manuals of oil content meters (15 ppm bilge alarm); and
- .6 EGR record book."

7 Regarding paragraph 3.2.1 of the draft Guidelines, IACS proposes that the bleed-off water discharge monitoring and recording should refer to the EGCS Guidelines. IACS therefore offers the following footnote to be added to paragraph 3.2.1.3:

Turbidity measurement equipment for monitoring and data recording of bleed-off water discharge should meet the criteria specified in the EGCS guidelines.

Issues for further consideration

8 In paragraphs 11.7 and 11.10 of document PPR 4/21, it is noted that PPR 4 discussed and thereafter agreed to include section 6 on "survey and certification" in the draft Guidelines. However, the "bleed-off discharge system" mentioned in this paragraph is not clearly defined, which will be open to differing interpretations in determining the scope of the survey required to implement this section of the draft Guidelines.

9 In the opinion of IACS, the draft Guidelines should be explicitly connected to the NO_x Technical Code 2008, as IACS sees challenges in applying the Guidelines without such a linkage. IACS urges the Committee to consider this issue at this session and, in particular, the proposal made in the Working Group on Prevention of air pollution from ships established at PPR 4, which IACS supports, that a new chapter 8 of the NO_x Technical Code 2008 should be developed (PPR 4/WP.6, paragraph 17.1),

10 Furthermore, the Committee should consider whether the *Survey Guidelines under the Harmonized System of Survey and Certification (HSSC), 2015* (resolution A.1104(29)) and the *2009 Guidelines for port State control under the revised MARPOL Annex VI* (resolution MEPC.181(59)) should be reviewed in light of the adoption of the draft Guidelines.

Action requested of the Committee

11 The Committee is invited to consider the proposals (paragraphs 3 to 7) and comments (paragraphs 8 to 10) provided above and to take action as appropriate.
