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**REVIEW OF THE 2015 GUIDELINES FOR EXHAUST GAS CLEANING SYSTEMS
(RESOLUTION MEPC.259(68))**

Comments on document PPR 6/11

Submitted by IACS

SUMMARY

Executive summary: This document provides comments on part 1 of the report of the Correspondence Group on Exhaust Gas Cleaning Systems (PPR 6/11), which includes proposals for amendments to the *2015 Guidelines for exhaust gas cleaning systems* (resolution MEPC.259(68)). The document highlights the need for clarification of the expected contents of the Onboard Monitoring Manual (OMM) with respect to the survey requirements for monitoring systems used for continuous monitoring of Scheme B exhaust gas cleaning systems

Strategic direction, if applicable: 1

Output: 1.12

Action to be taken: Paragraph 12

Related documents: PPR 6/11, PPR 6/20; and resolution MEPC.259(68)

Background

1 PPR 6 agreed to refer to PPR 7 document PPR 6/11 (Finland), which contains Part 1 of the report of the Correspondence Group, providing proposals for amendments to the *2015 Guidelines for exhaust gas cleaning systems* (resolution MEPC.259(68)) (2015 EGCS Guidelines), and all other related documents that had been submitted to PPR 6 or could be submitted to PPR 7, with a view to finalizing the work at PPR 7 (PPR 6/20, paragraphs 11.22 and 11.23).

2 Paragraph 5.3.1 of the draft amendments to the 2015 EGCS Guidelines (PPR 6/11, annex 2) states that (here and throughout the document¹):

"5.3.1 The EGCS's exhaust gas monitoring system of the EGC system should be subject to survey on installation and at initial, annual/intermediate and renewals surveys by the Administration in order to demonstrate that it functions as given in the OMM. The scope of the installation or initial survey should include EGCS operation, as required, in order to demonstrate the functionality of the exhaust gas monitoring system."

3 The draft amendments to paragraph 5.3.1 in the 2015 EGCS Guidelines (PPR 6/11, annex 2) retain this provision and further clarify that the purpose of the survey is to demonstrate that the monitoring system functions as given in the Onboard Monitoring Manual (OMM).

4 Paragraphs 8.3 and 8.4 of the draft amendments to the 2015 EGCS Guidelines (PPR 6/11, annex 2) address the contents of the OMM i.e.:

"8.3 The OMM should specify how the EGCS, operating parameter measurement instruments and the exhaust gas and discharge water monitoring systems are to be surveyed in order to verify that:

- .1 the EGCS conforms to the ETM-A or ETM-B as applicable;
- .2 the operating parameter instruments installed and used on board are as approved per the OMM;
- .3 the exhaust gas and discharge water monitoring systems used on board are as approved per the OMM;
- .4 inspection, maintenance, servicing, calibration and adjustments have been undertaken as required and those actions recorded in the EGCS Record Book as required; and
- .5 the operating parameter instruments and the exhaust gas and the discharge water monitoring systems are correctly functioning.

8.4 The OMM should be approved by the Administration."

5 Paragraph 4.3.6 of the 2015 EGCS Guidelines, which remains unchanged in the draft amendments in annex 2 to document PPR 6/11, provides information on the load point test conditions for emissions testing for a 'Scheme A' EGCS.

Discussion

6 IACS notes that the draft amendments to paragraph 5.3.1 of the 2015 EGCS Guidelines clarify that installation or initial survey should include EGCS operation. This is not required for subsequent surveys, required by regulation 5 of MARPOL Annex VI, of monitoring systems provided for continuous monitoring of a Scheme B EGCS.

¹ Tracked changes are indicated using "strikeout" for deleted text and "grey shading" to highlight all modifications and new insertions, including deleted text.

7 Whilst the draft amendments state that the installation or initial survey should include EGCS operation, with a view to demonstrating the performance of the continuous monitoring system, there is some remaining ambiguity as to what "include EGCS operation" means. In particular, IACS considers clarity is needed regarding the operational condition(s) of the EGCS during installation or initial survey, which demonstrate the operational behaviour or functionality of the monitoring system when EGCS operation is necessary to achieve the verification outcomes required in the draft amendments to paragraph 8.3 of the 2015 EGCS Guidelines.

8 Whilst EGCS installations vary to the extent that a prescribed operational condition would be impractical and inappropriate, manufacturers should provide a description of the operational condition(s), which would demonstrate the operational behaviour and functionality of the monitoring system when the operation of the EGCS is required for the purposes of installation or initial survey. This description may be used for simple installations and may be taken into account when installations are more complex. This is necessary to support the survey and certification provisions of monitoring systems installed for continuous monitoring of a Scheme B EGCS.

9 IACS notes that the draft amendments to paragraph 8.3 of the 2015 EGCS Guidelines (PPR 6/11, annex 2) includes new information on the expected verification outcomes from surveys (paragraphs 8.3.1 to 8.3.5 of annex 2 to document PPR 6/11). However, the amendments do not address the issue discussed in paragraphs 7 and 8 above.

Proposal

10 Based on the foregoing, IACS proposes that the Sub-Committee considers agreeing, or otherwise, that it is necessary to further clarify the draft amendments to paragraph 5.3.1 of the 2015 EGCS Guidelines and the meaning of the phrase "include EGCS operation".

11 If the Sub-Committee so agrees, IACS proposes that this is addressed by stating that manufacturers should describe the operational condition(s), which should be used or taken into account during installation or initial surveys, to demonstrate the functionality of the monitoring system, if operation of the EGCS is required. To give effect to this proposal, two new paragraphs are suggested to be inserted after paragraph 8.3 in section 8 (Onboard Monitoring Manual (OMM)) of the draft amendments to the 2015 EGCS Guidelines (PPR 6/11, annex 2) as follows:

"8.3bis Where operation of the EGCS is required to demonstrate the functionality of the monitoring system during installation or initial surveys, the OMM should describe the operational condition(s) which demonstrate the operational behaviour of the monitoring system and which should be used when surveying in accordance with paragraph 5.3.1. The description of condition(s) should include:

- .1 the range of fuel oil combustion unit load points;
- .2 the minimum operating time at a given load point;
- .3 the range of mass flow rates of exhaust gas; and
- .4 the range of sulphur contents of the fuel oil, including fuel oil with a sulphur content equal to the maximum that the EGCS is designed for."

"8.3ter Where the EGCS installation has special characteristics, including multi-inlet arrangements, the condition(s) described in accordance with paragraph 8.3bis should be taken into account in the event that deviations are necessary."

Action requested of the Sub-Committee

12 The Sub-Committee is invited to consider the request for clarification in paragraph 10 above and, if so agreed, the proposal in paragraph 11; and take action as appropriate.
