

## Subject: “Spare consumables for oily water separator!”

**Case:** Recently, it has been reported that a cargo vessel, faced difficulties in Japan when Port State Control Officers boarded the vessel for a PSC inspection. Amongst other findings, the PSC Officers during inspection of the Oily Water Separator and the functionality of the Oil Content Meter (OCM) highlighted that although the OWS equipment uses consumable filter elements, recording paper, etc. the OWS spare filter was not an original one.



[Photo: ‘US Coast Guard’ Two engineers as they test the oily water separator in the vessel’s engine space during a port state control exam]

As a result, the following deficiency was imposed:

### “OWS filter on board not original”

In connection to the above, and in order to assist our Clients to avoid similar complications in the future, we would like to highlight the *U.S Coast Guard guidance for the enforcement of MARPOL Annex I during Port State Control Examinations* pursuant to the above case:

*“USCG - G – PVC Policy Letter 06-01 – Regardless of the manufacturer’s instructions, the PSCO should additionally ensure the following: [...] If the OWS equipment uses consumable filter elements, coalescing media, recording paper, etc., verify that reasonable quantities of these consumables are onboard. In addition, the OWS manufacturer’s recommended spare parts should also be onboard.”*

Referring to the above mentioned guidance and in order to assist further, *‘Prevention at Sea’* suggests the following items to be considered with regards to the vessel’s operational inspection of equipment;



[Photo: American Club – Loss Prevention –Poster No. 7 ‘Bypassing the Oily Water Separator Is a Short Cut To Jail!']

- ⚙ An operation manual for the OWS should be available onboard. Crew members involved in the use of the equipment should be familiar with its contents.
- ⚙ It is suggested that Working instructions and an operating diagram to be posted on or next to the OWS unit. These should be as clear and simple as possible.
- ⚙ An original set of spare filter elements for OWS should be available onboard at all times and included in the Minimum Critical Spares List.
- ⚙ It is recommended that any defects on the operation of the OWS and associated equipment, to be rectified without delay. Whenever a defect cannot be repaired on board, the Mariners must ensure that all necessary actions are taken to prevent accidental discharges whilst the vessel operator should be notified as necessary for further support.
- ⚙ Any defects of the system should be reported to Class / Flag Administration prior arrival to the next Port.

We remain at your disposal for more details,

## *Prevention at Sea*