

Subject: “Revised MARPOL requirements for oil residue (sludge) piping arrangements”

Case

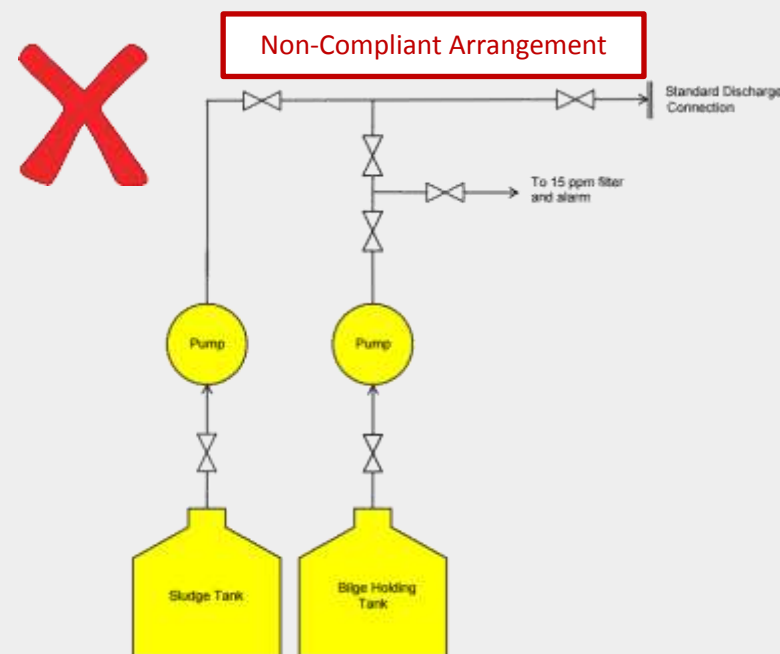
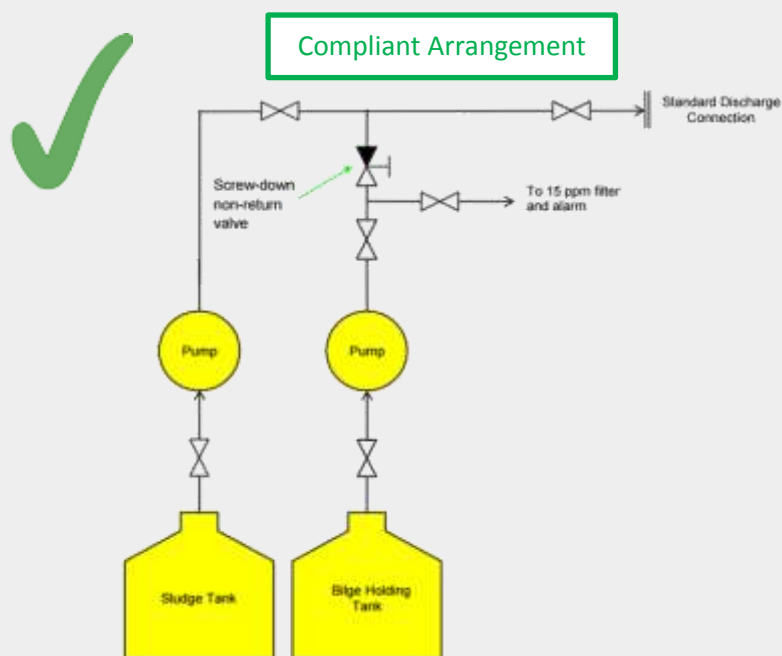
During a PSC Inspection, it has been noticed by the PSC Officer that despite the fact that the piping arrangements of the vessel have been modified according to the revised MARPOL Annex I requirements, the amended Piping Diagram has not been approved by the Classification Society. A deficiency has been imposed by the PSC Officer regarding Pumping, piping and discharge arrangements.

Notice to:
All shipowners
and managers

Regulation

The IMO has adopted amendments to **Regulation 12 of MARPOL Annex I** (see [Resolution MEPC.266 \(68\)](#)), which will enter into force on **1 January, 2017**. **According to the aforementioned** the oil residue (sludge) tanks should not be provided with discharge connections to the bilge system, oily bilge water holding tank(s), tank top or oily water separators.

Examples of Compliant and non-Compliant Arrangements



- Where common arrangements are provided for the discharge of bilge water and sludge through the standard discharge connection, a screw-down non-return valve must be provided to prevent the accidental discharge of sludge to the bilge system.

- The screw-down non-return valve prevents oil residue (sludge) from potential discharge to the 15 ppm Filter Unit as well as to the Oil Bilge Water Holding Tank.
- The arrangement above is not acceptable as there is a sludge discharge connection to the oily water separator, bilge system and Oily Bilge Water Holding Tank – prohibited under Regulation 12.2.2.

It is anticipated that existing vessels with keel laid before 31 December 1990 will be affected, as they may be equipped with connections between the bilge and sludge systems. Connections between designated sludge pumps and the oily water separator are not uncommon and should be removed.

Application

These requirements apply to all new and existing vessels of 400 GT and above (previously, they did not apply to vessels delivered before 1 January 2014). All ships of 400 GT and above, constructed before 1 January 2017 must comply with the requirements no later than the **first renewal survey carried out on or after 1 January 2017**.

For more information do not hesitate to contact us!

We remain at your disposal,

Prevention at Sea