



Risk Assessment Solutions

“Prevent, Don’t Cure”

Circular 01/10/14

(This circular revokes the circular 01/03/14)

Subject: Cooking Oil – Important MARPOL / PSC Issue!

Case: Very often “Prevention at Sea” is invited to advise and provide clarification on the proper disposal procedures of used cooking oil on board. Therefore, this circular is an attempt to clarify the following queries:

- 1) Can cooking oil be treated by the OWS?
- 2) Can cooking oil be incinerated?

Analysis

In connection to the above, and in order to assist our clients to avoid complication with the PSC, we would like to emphasize/highlight that the used cooking oil is considered a considerable environmental pollutant and its handling should be part of the Garbage Management Manual, as per MARPOL Annex V (as amended).

Cooking Oil means any type of edible oil or animal fat used or intended to be used for the preparation or cooking of food, but does not include the food itself that is prepared using these oils.

Furthermore, we would like to remind our clients that the disposal of the used cooking oil is prohibited, thus special care should be taken for proper storage on board until its disposal ashore or treatment through the Incinerator.

Answer to the 1st query

Disposal of the cooking oil into the Waste Oil system (Oily bilge system) and then treating same through the Oil Water Separator (OWS) **is not recommended**. This practice should be avoided as same means that oil under MARPOL Annex I (oily water) is being mixed with oil under MARPOL Annex V (cooking oil). In addition, it should be highlighted that although the Oily Water Separator may be able to treat the cooking oil, the OWS unit and the 15 ppm alarm are not approved to treat used cooking oil. The subject unit is approved and tested under specific IMO Resolution and it is not tested against cooking oil unless it is specifically stated by the OWS maker. Records in the Oil record book Annex I should correspond with the records in the Garbage Record Book Annex V for discharge ashore.

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Answer to the 2nd query

Cooking oil could be burnt in the incinerator, provided that the cooking oil is not driven to the incinerator through the bilge/sludge system. In this case the cooking oil should be carried through by other means e.g. an incinerator day tank which only allows access to the incinerator and there is no drainage option back to the bilge system. Relevant entries should be available in the Log books.

One option of proper storage/disposal could be the Chief Cook to collect the cooking oil which is not suitable for further use in a distinctively marked container (e.g. bottle, can etc) either painted or indicated "Cooking Oil for Disposal Ashore" and notify the Captain or the C/O accordingly. The Captain or the assigned Officer should then notify the Port Cleaning Agencies (preferable through agent) and the Chief Cook should deliver the cooking oil ashore whilst relevant receipt must be issued/obtained which in turn should be stored inside the Garbage Record Book for easy reference and relevant entry, signed by the Captain, should be made.

Our company is offering a wide range of 'deficiencies', case studies, clarification on the PSC deficiencies through our PSC seminar which is delivered on regular intervals in our office or in-house at client's request.

To assist further, we offer our clients the service of assessing onboard or through "Distance Assessment" if a vessel is in conformance with the MLC 2006 or PSC requirements or conducting inspections equivalent to PSC/Flag/Rightship inspections to detect and prevent unpleasant occurrences!

We remain at your disposal for more details,

Prevention at Sea