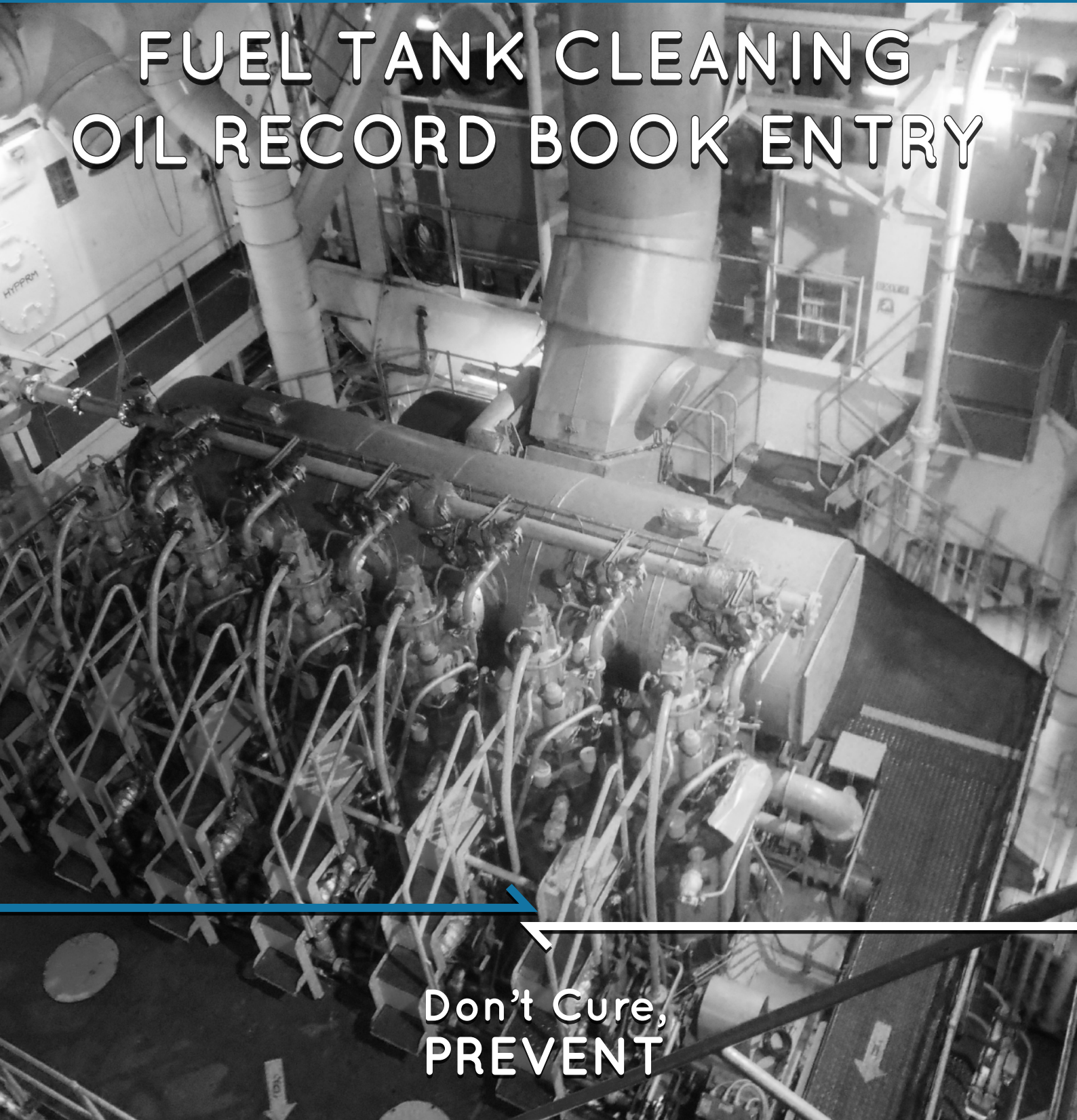




PREVENTION AT SEA

CIRCULAR 12/2019

FUEL TANK CLEANING OIL RECORD BOOK ENTRY



Don't Cure,
PREVENT

FUEL TANK CLEANING – OIL RECORD BOOK ENTRY

CASE

Considering the vast number of calls over the last 3 months and also the confusion noticed by PAS Assessors on board ships regarding the correct entry in the Oil Record Book relating to Fuel oil tank cleaning, PAS decided this month to provide a step-by-step approach on the subject issue.

The seriousness of this case lies in the fact that the fuel tanks have to be cleaned in order to accommodate the new types of compliant fuel oil as required by the upcoming Sulphur Cap 2020 regulation.

REGULATORY FRAMEWORK

As per MARPOL Annex I - Regulations for the Prevention of Pollution by Oil regulation 17.

The Oil Record Book Part I shall be completed on each occasion, on a tank-to-tank basis if appropriate, whenever any of the following machinery space operations takes place in the ship:

- Ballasting or cleaning of oil fuel tanks
- Discharge of dirty ballast or cleaning water from oil fuel tanks
- Collection and disposal of oil residues (sludge and other oil residues)
- Discharge overboard or disposal otherwise of bilge water which has accumulated in machinery spaces
- Bunkering of fuel or bulk lubricating oil.

According to ORB Part I Code A, reference is made to fuel oil tanks' cleaning but it is PAS's strong opinion that the said code should only be used for recording the FO tank cleaning, followed by ballasting and NOT bunkering of other FO type.

BUT WHAT IS THE SUGGESTED PROCESS?

To PAS's understanding, the said FO tank cleaning involves two (2) different cases for consideration.

1. The collection of sludge/unpumpable fuel from FO tanks
2. The collection of sediments such as oily rags and other material used during the cleaning.

The following suggested actions should be taken/recorded:

CLEANING OF FO TANK	COLLECTION OF SLUDGE FROM FO TANKS IN DRUMS	COLLECTION OF SEDIMENTS FROM FO TANKS IN DRUMS	DISPOSAL OF SLUDGE INTO A SLUDGE TANK FOR FURTHER TREATMENT (SUCH AS INCINERATION) OR	RETENTION OF SLUDGE INTO DRUMS AND WEEKLY INVENTORY REPORTING UNTIL DELIVERY ASHORE	DELIVERY ASHORE OF THE SEDIMENTS
ORB ENTRY	ORB ENTRY	GARBAGE RECORD BOOK ENTRY	ORB ENTRY	ORB ENTRY	GARBAGE RECORD BOOK ENTRY

OUR PROPOSAL

SLUDGE HANDLING & RECORDING

STEP 1

Entry in the Oil Record Book Part I under Code I for the cleaning operation of the Fuel Oil Tank.

DATE	CODE	ENTRY
10-DEC-2019	1	CLEANING OF XXXX FUEL TANK (FR. XX-XX) CARRIED OUT.

STEP 2

Entry in the Oil Record Book under **Code C 11.1/11.2/11.3/11.4** for the transfer of sludge/unpumpable fuel oil which exist in the Fuel Oil tank to drums.

DATE	CODE	ENTRY
10-DEC-2019	C 11.1	DRUMS, SAFELY SECURED (LOCATION)
	11.2	NIL
	11.3	XX.XX M3
	11.4	XX.XX M3 COLLECTED FROM XXXX FUEL TANK (FR. XX-XX)

ATTENTION: PERMISSION BY THE FLAG ADMINISTRATION IS REQUIRED FOR TRANSFERRING AND RETAINING SLUDGE IN DRUMS.

STEP 3

ONCE THE SLUDGE IS STORED IN DRUMS, THERE ARE TWO OPTIONS:

- A. Disposal of such sludge into sludge tank for further treatment (such as incineration)
- B. Retention of such sludge into drums and weekly inventory reporting until their delivery ashore

OPTION A

Disposal of sludges from drums to Tank listed in section 3.1 of the IOPPC Supplement for further treatment (such as incineration) under **Code C 11.1/11.2/11.3/11.4**. Manual collection is suggested.

DATE	CODE	ENTRY
10-DEC-2019	C 11.1	IOPPC SECTION 3.1 TANK (SLUDGE TANK)
	11.2	XX.XX M3
	11.3	XX.XX M3
	11.4	XX.XX M3 COLLECTED FROM DRUMS

OPTION B

Retention of sludge into the drums until delivery ashore.

Due to the sludge retention in drums, a weekly inventory under Code C 11.1/11.2/11.3 is mandatory until delivery ashore, by following the same approach for the IOPP section 3.1 tanks.

DATE	CODE	ENTRY
10-DEC-2019	C 11.1	DRUMS
	11.2	NIL
	11.3	XX.XX M3 (CURRENT QUANTITY IN DRUMS)

STEP 4

Once the drums are delivered ashore the following should be recorded in ORB

DATE	CODE	ENTRY
10-DEC-2019	C 12.1	XX.XX M3 SLUDGE FROM DRUMS, XX.XX M3 RETAINED
		TO SHORE FACILITY DURING PORT STAY AT (NAME OF PORT)
		RECEIPT NO. XXXXXXXX

SEDIMENTS HANDLING & RECORDING

As per INTERTANKO's Guidance on Records for Cleaning of Fuel Oil Tanks (de-mucking) and Cargo Tanks of Bunker Barges V1, issued in November 2019, the cleaning operation that involves the manual collection of solid residues (sediments) should be recorded under Code F (Operational Wastes) in the Garbage Record Book, until their disposal to garbage reception facility or their incineration. No entry in the Oil Record Book is required.

REMEMBER: THE INCINERATION OR LANDING ASHORE OF OILY GARBAGE AND USED FILTERS SHOULD BE RECORDED IN THE GARBAGE RECORD BOOK ONLY.
(Ref.: MEPC.1/Circ.736/Rev.2)

BEST PRACTICE



- ✓ Ensure that all safety precautions before tanks' cleaning have been taken.
- ✓ Further training and familiarization to be provided to the Engine Officers.
- ✓ Ensure that procedures described in Ship Implementation Plan (SIP) for Fuel Tanks' Cleaning are followed.
- ✓ Ensure that all relevant forms regarding ventilation, enclosed space permit and hot work permit are readily available for inspection by Flag state, Class and PSC Officers.

Don't Cure Prevent

Circular 12/2019



FOR MORE INFORMATION,
PLEASE DO NOT HESITATE TO CONTACT US.



Prevention at Sea Ltd
52 Arch. Makariou III Avenue,
Ydrogios Tower, CY 6017
Larnaca - Cyprus

Tel: +357 24819800
Fax: +357 24819881



Tel: +30 210 64 37 637



info@preventionatsea.com



www.preventionatsea.com

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