

# MARPOL Annex II 2007

## The Practical Implications of Regulation 4.1.3



# What Prompted Veg Oils Being Reclassified ?

- Uncontrolled discharges in the North Sea
- Vegetable oils were classified as “persistent floaters” making them fall under the IBC Code
- The removal of older product tankers from the trade

# What Makes a Chemical Tanker a Chemical Tanker?



# What Makes a Chemical Tanker a Chemical Tanker?

- Certificate of Fitness
- Procedures and Arrangements Manual
- Underwater Discharge
- Stripping Requirements
- Crew Training

# **Certificate of Fitness**

**“Owners Instruction  
Manual for a Ship”**

# The Certificate of Fitness

- Every chemical tanker is required to have a Certificate of Fitness (CoF) – indicating that it is certified to carry certain products.
- The issuance of a CoF will also require a revised Procedures and Arrangements (P&A) Manual.

# The Procedures and Arrangements Manual

- The issuance of a CoF will also require a revised Procedures and Arrangements Manual
- From January 2007, chemical tankers will need new certifications and a new Procedures and Arrangements Manual
- Certain veg oil cargoes because of their viscosity will be require pre-wash in accordance with the P&A Manual

# The Procedures and Arrangements Manual

- Vessels engaged in the oil and products trade are not required to have a P&A Manual
- The requirement for a P&A Manual is laid out in MARPOL Annex II and the IBC Code



# The P & A and Pre-wash

- Regulation 8 of Annex II of MARPOL 73/78 require ships to conduct mandatory in-port pre-washes after unloading certain solidifying or high viscosity cargoes (including some veg oils)
- After unloading a cargo tank containing certain cargoes the tank must be pre-washed in accordance with the procedures specified in the ship's P&A Manual.

# Under Water Discharge



# Under Water Discharge

- An underwater discharge arrangement for tank washing water is required for pollution categories X and Y for ships keel-laid before 1 January 2007.
- Newer ships will require such for all pollution categories X, Y and Z.

# Stripping Requirements

| Cat | BCH Ships<br>Const. before 31/7/1986                          | Existing IBC<br>constructed from<br>31/7/1986 but before<br>1/1/2007 | New Buildings<br>Constructed from<br>1/1/2007                |
|-----|---|--|--|
| X   | Pre Wash<br>Strip to 300 Litres                               | Pre Wash<br>Strip to 100 Litres                                      | Pre Wash<br>Strip to 75 Litres                               |
| Y   | Pre Wash for high<br>viscosity cargoes<br>Strip to 300 Litres | Pre Wash for high<br>viscosity cargoes<br>Strip to 100 Litres        | Pre Wash for high<br>viscosity cargoes<br>Strip to 75 Litres |
| Z   | Strip to 900 Litres   | Strip to 300 Litres  | Strip to 75 Litres   |
| OS  | No requirements   | No requirements  | No requirements  |

# Crew Training



# Chemical Tanker Crew Training

- For seafarers serving onboard Chemical Tankers, Certificate or documentary evidence issued in accordance with STCW Code
- Dangerous Cargo Endorsement is issued by the flag state

# Chemical Tanker Crew Training

- This training includes chemical tanker safety, fire safety measures and systems, prevention and control of pollution, operational practice and obligations under applicable laws and regulations, the course covers all training necessary to apply the provisions of Annex II of MARPOL 73/78.
- This is not required for product tanker crews

# The Veg Oil Compromise

*An Administration **may** exempt ships from the carriage requirements under Regulation 11 for ships Certified to carry individually identified vegetable oils identified by the relevant footnote (k) in chapter 17 of the IBC Code, provided the ship complies with the following conditions:*

- 1. Subject to this regulation, the NLS tanker shall **meet all requirements for ship type 3 as identified in the IBC Code except for cargo tank location;***
- 2. Under this regulation, cargo tanks shall be located at the following distances inboard. The entire cargo tank length shall be protected by ballast tanks or spaces other than tanks that carry oil*



# Differences in Tankers

## 1) Oil Tankers

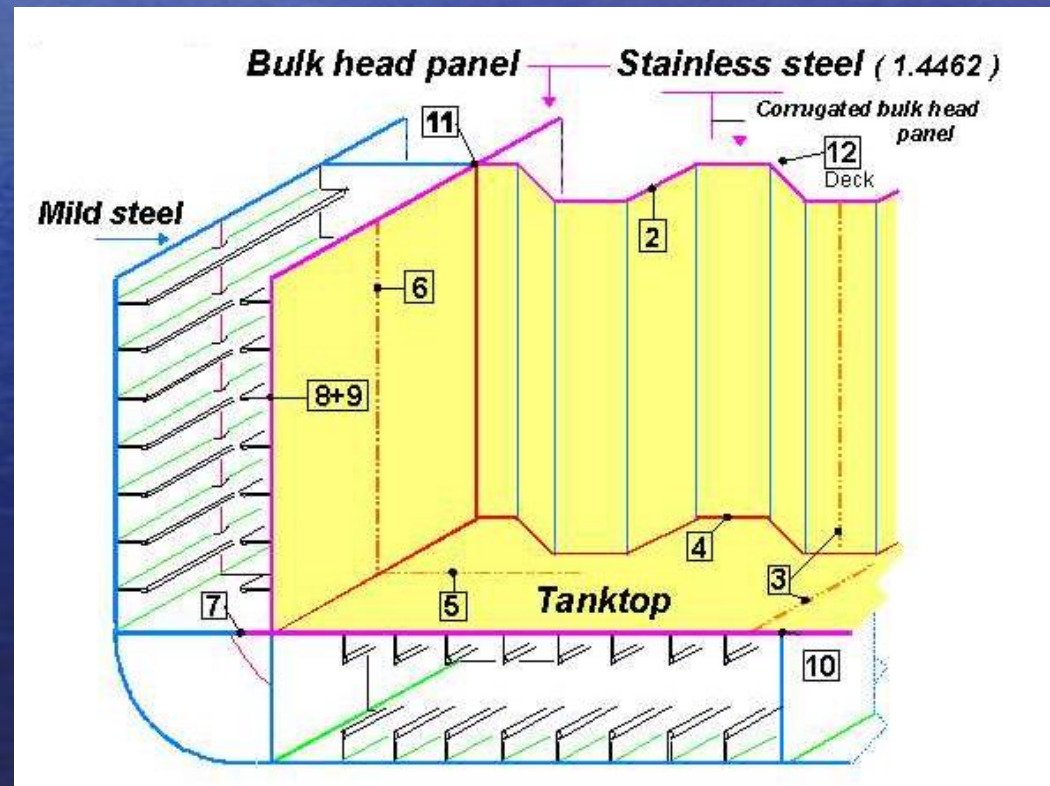
- All slops go ashore

## 2) Chemical Tankers

- Oil slops go ashore.
- Chemical pre-wash slops go ashore.
- Overboard discharge according to Marpol Regulations.

# Cargo Tank Location of 4.1.3 are Double Hull

- Type 2 Chemical Tanker : 760 millimeters.
- Oil Tanker : 1000 millimeters.



# The Veg Oil Compromise

- The intent of the language of the compromise was to allow double hull product tankers to be converted to Type 3 chemical tankers ( with a Certificate of Fitness, a P&A Manual, specialized training, etc)
- Vessels are currently being converted from product tankers to chemical tankers

# Conclusion/Questions

- Is retro-fitting practical or possible?
- Regulation 4.1.3 requires a chemical tanker
- Product tankers can be used but certain design and operational changes need to be made