



BERMUDA SHIPPING NOTICE

Ozone Depleting Substances and Recording of Low Sulphur Fuel Changeovers .

Summary

New requirements arising from amendments to Annex VI of the MARPOL Convention come into force on July 1st 2010. This Notice is intended to advise owners and crews of the changes and clarify the Administration's requirements so that ships may ensure compliance with the requirements. They were originally highlighted in the previous Notice ROS-SC.37 in the previous set of notices. That notice is now superseded by this notice.

Ozone-depleting substances record book.

Revised Annex VI. – regulation 12 - Ozone-depleting substances.

Regulation 12 of the revised Annex VI requires that from 1st July 2010 (the date of entry into force of the revised Annex) every ship that is issued with an International Air Pollution Prevention Certificate (IAPPC) – (required for ship over 400 GT) - and that has on board any rechargeable systems that contain ozone-depleting substances must maintain an ozone-depleting substances record book. Ozone-depleting substances are defined in the Annex and include Halons, commonly found as fire extinguishing gases and a number of CFCs commonly used as refrigerants.

The record book is required to be completed without delay after every occasion when ozone-depleting substances are handled or equipment containing them is repaired or maintained and it must record:

- Every recharge, (full or partial) (in kg) of equipment containing ozone-depleting substances.
- Every repair or maintenance action of equipment containing ozone-depleting substances;
- Every discharge (in kg) of ozone-depleting substances to atmosphere whether:
 - Deliberate, or
 - Non-deliberate.
- Every discharge (in kg) of ozone-depleting substances to land-based reception facilities; and
- Every supply (in kg) of ozone-depleting substances to the ship.

The Annex does not specify the form of this record book and the Bermuda Maritime Administration will accept any paper based or book system that:

- Contains the data listed above including the date of the activity and the date of the entry,
- Provides for the record to be signed in the same manner as is the Oil Record Book; and
- Has a process such as numbered pages or otherwise that demonstrates that the record is complete and continuous.

The Annex also provides that the ozone-depleting substances record book may be part of an existing logbook. The Administration will accept arrangements to incorporate this data in any existing log book provided that the correct data as specified above is entered.

The Annex also allows for an electronic system “*as approved by the Administration*”. In the case of arrangements, therefore, that use a system of electronic records for this purpose the Bermuda Maritime Administration will need to signify its approval in order to meet the Annex requirements. Owners who plan to opt for this approach should submit an outline of the system they plan which shows that it includes all the data listed above, that it otherwise fulfils the criteria above and that it has adequate security of the data. On receipt of such submissions the Administration will issue a letter of approval.

On introducing the ozone-depleting substances record book the Administration would recommend that the initial entry records any stocks held on board at the date of first entry.

VOC management plan.

Revised Annex VI. Regulations – regulation 15 – Volatile Organic Compounds (VOCs).

The revised Annex introduces a new requirement for tankers carrying crude oil to have on board and to implement a VOC Management Plan. The VOC Management Plan is intended to be specific to each ship and to provide at least:

- Written procedures for minimising VOC emissions during loading, sea passage and discharge;
- Consideration of the additional VOCs generated during crude oil washing; and
- The identity of a person responsible for implementing the plan.

For Bermuda ships it should be in English, but a translation into the ship’s working language where the working language is not English shall be provided.

VOC Management Plans are required to be approved by the Administration and this task has been delegated to the Recognised Organisations (Classification Societies) recognised by Bermuda who already have delegated powers under MARPOL. Owners who have prepared VOC management Plans and who wish to have them approved should approach their Class Societies for this service.

Arrangements for entering emission control areas and records.

Revised Annex VI - Regulation 14.4 and 14.6

Ships that use separate fuel oils to meet the sulphur content requirements in Regulation 14.4 for operations in an emission control area are required to have a written procedure for changing over from normal fuel to low sulphur fuel. The procedures should allow sufficient time for the system to be fully flushed and changed over prior to entry to the emission control area.

The regulation requires that the operation be recorded in a log book as prescribed by the administration.

On Bermuda ships the operator may use any form of log book or log recording sheet provided that it records:

- The volume of low sulphur fuel in each tank at the changeover on entry to an emission control area, ,
- The position, date and time of completion of changeover procedures on entry to the emission control area,
- The position, date and time of the completion of changeover procedures on leaving the emission control area.
- The volume of low sulphur fuel in each tank on changeover when leaving the emission control area.

Owners may elect to use an electronic version of this log provided that it records the data specified here and that there are arrangements in place to prevent any change to an entry once made.
