



MARINE ENVIRONMENT PROTECTION  
COMMITTEE  
59th session  
Agenda item 6

MEPC 59/6/13  
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## INTERPRETATIONS OF, AND AMENDMENTS TO, MARPOL AND RELATED INSTRUMENTS

### Comments on proposed amendments to MARPOL Annex I – Improved cargo piping arrangements in order to transfer cargo into ballast tanks when a ship is in an emergency situation

Submitted by OCIMF and INTERTANKO

#### SUMMARY

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| <i>Executive summary:</i>   | This document offers comments on proposals for amendments to regulation 30 of MARPOL Annex I to allow for the emergency transfer procedures of oil cargo into empty ballast tanks on single hull tankers |
| <i>Strategic direction:</i> | 7.1  |
| <i>High-level action:</i>   | 7.1.2  |
| <i>Planned output:</i>      | -  |
| <i>Action to be taken:</i>  | Paragraph 8  |
| <i>Related document:</i>    | MEPC 59/6/9  |

#### Introduction

1 This document is submitted in accordance with paragraph 4.10.5 of the Committee's Guidelines (MSC-MEPC.1/Circ.2), and provides comments on document MEPC 59/6/9. It offers observations and brief comment upon proposals for modifications to pump-room and pipeline line systems on board tankers in order to facilitate transfer cargoes in an emergency situation into water ballast tanks on board an oil tanker.

2 The co-sponsors of this response paper noted with concerns the observations and proposals submitted under this agenda item to amend MARPOL Annex I to facilitate the transfer of oil cargo into segregated water ballast tanks for oil tankers. The co-sponsors cannot see merit in the proposals that are to be applied, in general, to Annex I-type single hulled tankers in the future.

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3 Notwithstanding the degree of pollution caused by a crane barge, after tugboats had lost control of their tow, and the crane barge's subsequent collision into the M/T **Hebei Spirit** causing significant hull damage to the tanker, the co-sponsors do not believe that the proposed solutions suggested would have minimized the pollution created as a result of this hull damage.

### **Justification**

4 With the revisions to regulation 20 of MARPOL Annex I , and in particular paragraph 4, encompassing the general phase-out of single hull tankers by 2010, no single hulled tankers will be constructed in the future due to the requirements of regulation 19.1. Thus, such a proposed amendment, which could only be applicable to new buildings, would become irrelevant through lack of application.

5 Notwithstanding the foregoing, and to ensure safety of the tanker during and after such a proposed emergency procedure and transfer operation, it would become necessary to fit pressure/vacuum control valves to each of the ship's ballast tanks together with flame arrestors and permanent inert gas supply facilities.

6 The co-sponsors are unsure whether, even with such aforementioned facilities in place, it would be possible to undertake even an immediate gravity transfer of cargo into a non-designated cargo tank from a fully loaded cargo tank. Practical limitations such as removing the large blanks on the cargo/ballast pipelines and fitting of the spool pieces, as proposed, would be very time-consuming given the size and weight of these items to ensuring oil tight integrity. Further, to ensure safety for the vessel and avoid explosive mixtures occurring in the receiving tanks, they would have to be purged of their oxygen content to below 8% and pressurized to an acceptable pressure with inert gas.

7 Should this proposal be considered for use in future double hulled tankers, then the co-sponsors would point out that such an action would reduce the double hull protection of the tanker to single hull integrity.

### **Action requested of the Committee**

8 The Committee is invited to consider the observations and comments in this document and take action as appropriate.

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