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MOC Policy Letter
No. 04-13, Rev.1

From: 
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COMDT (G-MOC)

To: Distribution

Subj: GUIDELINES FOR THE INSPECTION OF OILY WATER MONITOR AND
SEPARATOR SYSTEMS

Ref: (a) International Maritime Organization (IMO) Resolution Marine Environment
Protection Committee (MEPC).107(49)

1. Purpose. To alert Coast Guard personnel to reference (a).
 - (a) You may see equipment installed to these new standards. Vessel operators installing new oily water monitoring and separating systems on or after 1 January 2005, may use the guidelines in reference (a). However, note that compliance with MEPC.107(49) is optional between 01 January 2005 and the entry into force of MARPOL Annex I (revised).
 - (b) This policy also recommends inspection and testing procedures for new generations of oily water monitor and separating systems. This revision modifies the inspection and testing procedures originally listed in enclosure (1) of Policy Letter 04-13. Specifically, enclosure (1), section 3 now allows for oily water monitoring/bilge alarm data to be either displayed electronically or printed. In addition, this revision deletes section 5 of enclosure (1).
2. Action. OCMI/COTPs should direct their staffs to use the following guidance during inspections, verifications, or tests of oily water monitoring and separating systems, which are approved to the MEPC.107(49) guidelines. This guidance applies equally to Port State Control activities as well as U.S. flag compliance inspections. See www.uscg.mil/hq/g-m/moc/docs.htm for internet access to this policy.
3. Directives affected. This letter supersedes MOC Policy Letter 04-13.
4. Background and Information. Approval of oily-water separating equipment and bilge alarms are pursuant to 46 CFR 162.050 or are listed in the current IMO MEPC Circular summary of MARPOL 73/78 approved equipment. Commandant (G-MSE-3) will develop a Notice of Proposed Rulemaking to revise 46 CFR 162.050 to incorporate the performance and testing procedures of IMO Resolution MEPC.107(49) into current U.S. regulation. G-MOC issued an interim Notice of Policy in December 2003 stating that the Coast Guard would approve equipment meeting the MEPC.107(49) until the revised regulations are published (68 Federal Register 75603, 31 December 2003).
 - (a) The Coast Guard should verify systems meeting reference (a) using enclosure (1).

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(b) The guidance contained in this document should assist the industry, public, Coast Guard and other federal and state regulators in applying statutory and regulatory requirements, the guidance is not a substitute for applicable legal requirements; nor is it a regulation itself. Thus, it is not intended to nor does it impose legally binding requirements on any party, including the Coast Guard, other Federal agencies, the States or the regulated community.

5. Implementation. During regularly scheduled inspections of U.S. vessels and Port State Control examinations (including annual examinations and Priority I and II examinations) of foreign vessels, marine safety personnel should follow the recommended guidelines of enclosure (1) for pollution prevention equipment (PPE), approved in accordance with reference (a).

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Enclosure (1) Recommended Guidelines for Oily Water Separator/Monitoring Systems

Distribution: CG LANTAREA (Am)
CG PACAREA (Pm)
CG Marine Safety Center
All Districts, Sectors, Activities, MSOs, and MSUs

Recommended Guidelines
for Oily Water Separator/Monitoring Systems
meeting MEPC.107(49)

- (1) Verify that the Oily Water Separator has been approved by the Coast Guard or appropriate Administration meeting Resolution MEPC.107(49).
- (2) Verify that the Oily Water Monitor/Bilge Alarm has been approved by the Coast Guard or appropriate Administration meeting Resolution MEPC.107(49).
- (3) Conduct a cursory review of 15 parts per million (ppm) bilge monitoring/alarm records during MARPOL Annex I examinations.
 - Oily water monitoring/bilge alarm equipment should be designed to store data for up to 18 months and should be able to display or print a protocol for inspectors if needed.
 - Recorded items should include: date, time, alarm status, and operating status of the 15 ppm separator.
 - Inspectors should compare those entries against existing Oil Record Book entries to determine any non-conformities.
 - All 15-ppm monitor/bilge alarms should be sealed to prevent willful manipulation of overboard discharge data.
- (4) Vessel owners should verify the accuracy of the 15-ppm oily water monitors or bilge alarms. This should be completed by an authorized equipment testing company at each International Oil Pollution Prevention (IOPP) Certificate renewal.
 - The calibration certificate should be verified during all IOPP examinations on U.S. flag vessels.
 - Port State Control officers may accept a valid IOPP certificate accompanied by the manufacturer's calibration certificate as proof of compliance from a foreign vessel.
 - Manufacturers' calibration certificates cannot be accepted as proof of compliance if they are older than five years. Therefore, for U.S. flag vessels, manufacturers' calibration testing should align with IOPP Certificate cycles to eliminate confusion and compliance lapses.
 - No further testing is needed unless tampering or malfunctioning is suspected.
 - Alternatively, the entire alarm unit may be replaced by a calibrated 15 ppm alarm. A bilge alarm should not be accepted as compliant if it is over five years old unless it has been calibrated as discussed in paragraph (4). Compliance officers should verify appropriate installation documentation for both U.S. and foreign flag vessels when unit replacement is selected. No further testing is needed unless tampering or malfunctioning is suspected.