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PREVENTION OF AIR POLLUTION FROM SHIPS

Proposed amendments to resolution MEPC.184(59) – 2009 Guidelines for Exhaust Gas Cleaning Systems

Submitted by the Institute of Marine Engineering, Science and Technology (IMarEST)

SUMMARY

Executive summary: This submission highlights the need for a correction to an error of intent with regard to the monitoring of washwater discharge at sea whenever an Exhaust Gas Cleaning System is in operation and the discharge criteria for “at sea” operations as found in section 10 of the “2009 Guidelines for Exhaust Gas Cleaning Systems” set forth under resolution MEPC.184(59)

Strategic direction: 7.3

High-level action: 7.3.1

Planned output: 7.3.1.1

Action to be taken: Paragraph 6

Related documents: MEPC 59/WP.10, MEPC 59/24 and MEPC 59/24/Add.1, annex 9

Introduction

1 Resolution MEPC.184(59) – 2009 Guidelines for Exhaust Gas Cleaning Systems, was adopted on 17 July 2009 at the fifty-ninth session of the Marine Environment Protection Committee, and revokes the Guidelines adopted by resolution MEPC.170(57) as from 1 July 2010. Prior to adoption of resolution MEPC.184 (59), the Committee established a Technical Group on Emission Control Areas and other MARPOL Annex VI-related issues, tasked, *inter alia*, to review and finalize the text of the 2009 Guidelines for Exhaust Gas Cleaning Systems, amongst numerous additional terms of reference. Due to the significant work load of this group, there was insufficient time to review all amendments to the Guidelines in detail. In particular, a late amendment proposed within the group included a requirement for continuous monitoring of washwater discharge whenever an Exhaust Gas Cleaning System is in operation.

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2 However, a washwater discharge criteria for “at sea” operations had not been proposed within the group, nor was this matter discussed. Furthermore, it has been noted that an error of intent may have occurred with respect to the aforementioned amendment to require the monitoring of washwater discharge at sea whenever an Exhaust Gas Cleaning System is in operation and what now appears to be a washwater discharge criteria for “at sea” operations. The positioning of the sentences for the “at sea” monitoring requirement implies that the “in port” washwater discharge criteria apply.

3 In order to resolve this error and address the requirements for “at sea” washwater criteria, this document provides a proposal for amendments to section 10 of the “2009 Guidelines for Exhaust Gas Cleaning Systems”. Furthermore it should be noted that, in fact, the washwater discharge criteria for “at sea” operation in this proposal are identical to the washwater discharge criteria for “in port” operation with the sole exception of the variation of the pH discharge limit at the point of washwater overboard discharge. The pH limit for “at sea” operation is proposed to be set at pH 3. The benefit of this proposal will be a significant reduction of power required for the additional water pumping capacity necessary to meet the “in port” pH limit while operating the Exhaust Gas Cleaning System at sea. It is further proposed that under the coordination of the Exhaust Gas Cleaning Systems Association (EGCSA) that work will be undertaken and presented to MEPC 61 to identify the impact of the pH 3 limit and if necessary propose a revision to this limit.

Summary and proposal

4 The proposed amendments to the “2009 Guidelines for Exhaust Gas Cleaning Systems” provide clarification between limits for washwater discharge “in port” and the limits applicable “at sea”. This submission provides, for an “at sea” pH limit and proposes that the other limits should be retained for whenever an Exhaust Gas Cleaning System is in use. The EGCSA will coordinate an impact assessment of the pH 3 limit and submit this information to the IMarEST for onward transmission to MEPC 61.

5 The proposed amendments to existing sentences in the Guidelines are simply to improve clarity. The amendments to the “2009 Guidelines for Exhaust Gas Cleaning Systems” are provided as follows, where a strike-through indicates words to be deleted and the underlined indicates words to be added:

10.1.1 When the EGC system is operated in ports, harbours, ~~or~~ estuaries, or at sea, the washwater monitoring and recording should be continuous except for short periods of maintenance and cleaning of the monitoring equipment. The values monitored and recorded should include pH, PAH, turbidity and temperature. ~~In other cases the continuous monitoring and recording equipment should be in operation, whenever the EGC system is in operation, except for short periods of maintenance and cleaning of equipment~~. The discharge water should comply with the following limits:

10.1.2 pH criteria

10.1.2.1 The Washwater discharge pH within port limits should comply with one of the following requirements which should be recorded in the ETM-A or ETM-B as applicable:

- (i) The ~~discharge~~ washwater discharged should have a pH of no less than 6.5 measured at the ship’s overboard discharge with the exception that during manoeuvring and transit, the maximum difference between inlet and outlet of 2pH unts is allowed measured at the ship’s inlet and overboard discharge.*

- (ii) *During commissioning of the unit(s) after installation, the ~~discharge~~ washwater discharge plume should be measured externally from the ship (at rest in harbour) and the discharge pH at the ship's overboard monitoring point will be recorded when the plume at 4 metres from the discharge point equals or is above pH 6.5. The discharge pH to achieve a minimum pH units of 6.5 will become the overboard pH discharge limit recorded in the ETM-A or ETM-B.*

10.1.2.2 The Washwater discharge pH for use outside of port limits should comply with the following requirements which should be recorded in the ETM-A or ETM-B as applicable:

- I. The washwater discharged should have a pH of no less than 3.0.

Action requested of the Committee

- 6 The Committee is invited to consider the foregoing and take action as appropriate.
