

## Bulletin 32 - 1/98 - Oil Record Book Checking (Fines) - Worldwide

Further to **Bulletin 15 - 8/97 - Oil Record Book Checking - Bremerhaven**, Owners / Masters should be aware that checking of Oil Record Books is not just restricted to Germany and that fines and delays are becoming more prevalent worldwide.

The following has been received from our ship inspectors. It highlights some of the more frequent omissions noted during their travels and offers some basic advice.

### OIL RECORD BOOKS

The Club Ship Inspectors frequently mention in their Reports improper maintenance of the Oil Record Book (ORB) to Masters and Chief Engineers and about the importance of correctly maintaining the ORB during their visits on board entered vessels.

#### **Sludge is easily calculated**

There is an approved formula, but as a rough guide, approximately 1% (one percent) of fuel shipped, ends up as sludge. That is HFO (Heavy Fuel Oil), MDO (Marine Diesel Oil) and LO (Lubricating Oil).

The inspecting authorities **SIMPLY** wish to be able to see clearly that the total oil shipped plus the oil already on board, less the main engine consumption for that voyage equals the total oil remaining on board (ROB) plus the sludge ROB.

**( ROB + bunkered fuel ) - M.E. cons. = ROB + sludge**

It is simple arithmetic to add up the amount that should be on board compared with the amount 'said to be' disposed. If the figures are not as required and the Inspecting Authority have to hunt for the figures and try to figure out the totals - this gets them suspicious.

If oil volume 'x' + 'y' - 'z' =< 'a' - then where is the oil ?  
In this case you are **guilty** until you can **prove** your innocence.

Another point is Class Societies may not properly annotate the IOPP certificate and Supplement 'B' to include the incinerator and/or the capacity of the OWS. Thus the ship may be incinerating the oil but according to the IOPP certificate there is no incinerator on board and although you may protest your innocence the Inspecting Authority assumes you have pumped it overboard.  
Meanwhile here is a fine to help concentrate the mind and get the paperwork right next time. !!

### **ORB entries**

**Correct entries must be made**

#### Sludge retention

**Entries under C 11.1** sludge retention and the entries required at the end of a voyage (or weekly if the vessel is on short sea trade) **are frequently overlooked and do not include the total ROB sludge.**

Simply on arrival at any port, if the vessel has been on a passage for more than seven (7) days, then a detailed entry of **ALL** sludge ROB on a tank by tank basis is required.

Vessels on short sea trade or coasting vessel make a weekly entry.

This is for two reasons:-

1) It is required by MARPOL and the Oil Record book - Section C11

2) If any pollution was to occur during the vessels stay in that particular port you have written proof of what the ship had on board in terms of sludge - tank by tank. A quick sounding of these tanks by the Authorities will prove that you are not the culprit. If the entries are not made then again you are guilty until you can prove your innocence. This will mean getting the local Club correspondent involved, Surveyors to attend, Club involvement and of course in the end totally unnecessary costs incurred by the Shipowner.

### **Disposal of Water**

Entries under D 15.2 disposal overboard of water in sludge **frequently do not contain the time of stopping or the TWO geographical positions required.** - i.e. at Start and Stopping of the Oily Water separator (OWS) or **an inaccurate estimate of the amount disposed of overboard** - e.g. the OWS has been on line for about two hours, has a capacity of 2 M<sup>3</sup> and during this period 10 M<sup>3</sup> have been pumped overboard according to the Third engineer's entry in the book. Simple arithmetic again !! Careful attention to entries and knowledge of the pumps and capacities will easily avoid this.

### **Bunkering**

Entries under H 27.3 (Fuel and DO) and 27.4 (Lub oil) **frequently do not give the required information requested by the Oil Record Book. i.e. total shipped, total shipped into each tank and total ROB after completion.** Read the instructions !!

The above changes came into effect in 1993 but many ships are still using either the old style ORB or the Engineers have not realized that these changes have come about. Members should have brought them to their officers attention at the time the changes took place.

### **What to do !!**

Simple - study the front cover or the instructions that come with the ORB or alternatively read the MARPOL Regulations - a copy must should be carried on board. (STCW 1995)

### **Keep the receipts**

Certificate records of sludge pumped to shore facilities or barges are sometimes not retained with the ORB, are lost or not available - they should be filed within the ORB - stapled or at the back or a clearly noted record made in the book as to where they are maintained.

### **Keep it neat - keep it clean**

Provided the ORB's are neat and properly record the information there is generally no problem, but if the records have NOT been entered as required, or it looks like a spider has crawled across the page the result could easily be a fine. Use plenty of space for the entries do not try to cram every entry into one line and always leave space between entries.

### **Read before you sign !!**

Masters must be aware that as they sign the bottom of each page they are attesting to the accuracy and correctness of the entries. The rule is always read carefully before you sign ANYTHING !!

Source of information: David Wright ( Ship Inspection Department)