



Ship Type: Bulk

Trade Area: Worldwide

## **Bulletin 452 - 02/06 - Disposal of Petcoke Hold Washings - Worldwide**

Following several recent enquiries about the disposal of petcoke hold washings, the Club has received the following advice:-

“Petcoke as a material is solid 95% carbon, wholly insoluble in water. It contains no oil in liquid form. Petcoke has been analysed and is shown in the ‘Gesamp/EHS Composite List of Hazard Profiles’ - an IMO publication. This states that it has no bio-accumulative effects, is non-hazardous to marine organisms and humans (oral intake or skin, eye contact or inhalation). Finally petcoke does not reduce the value of amenities (eg if petcoke is washed ashore after a discharge, the beach does not need to be closed due to hazardous effects).

This analysis is not applicable to petcoke in its dry form when its dust can be hazardous to humans.

It therefore follows that petcoke hold washings properly fall under Annex V of MARPOL and not Annex I. Within the 'Guidelines for the Implementation of Annex V', hold washings are classed as 'Operational Wastes'.

Following the Amendment to Annex V (MEPC 51/22), such discharges must now be recorded in the ship's Garbage Record Book. This amendment simply changes the format of the record book and does not change the MARPOL definitions of 'Cargo Residues' or 'Operational Wastes'.

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