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(PANAMÁ MARITIME AUTHORITY)
DIRECCIÓN GENERAL DE MARINA MERCANTE
(GENERAL DIRECTORATE OF MERCHANT MARINE)
DEPARTAMENTO DE CONTROL Y CUMPLIMIENTO
(DEPARTMENT OF CONTROL AND COMPLIANCE)

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Merchant Marine Notice

GUIDANCE ON INDICATION OF ONGOING COMPLIANCE IN THE CASE OF THE FAILURE OF A SINGLE MONITORING INSTRUMENT, AND RECOMMENDED ACTIONS TO TAKE IF THE EXHAUST GAS CLEANING SYSTEM (EGCS) FAILS TO MEET THE PROVISIONS OF THE 2015 EGCS GUIDELINES (Resolution MEPC.259(68)).

No.: MMN-11/2019

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The purpose of this Merchant Marine Notice is to communicate a Guidance on indication of ongoing compliance in the case of the failure of a single monitoring instrument, and recommended actions to take if the EGCS fails to meet the provisions of the 2015 EGCS guidelines (MEPC.259 (68)). It is essential to take into account, to be able to find the difference when it comes to situations of system operations and its malfunction, as well as to take the appropriate corrective measures to avoid non-compliance of the IMO 2020 sulfur limit reduction standard (MEPC 280 (70) / MEPC 305 (73)).

1. Goals.

These best practices are intended to assist a Crews and ships operator to ensure the effective implementation of the upcoming IMO 2020.

3. System malfunctions.

An Exhaust Gas Cleaning System (EGCS) malfunction is any condition that leads to an emission exceedance, with the exception of the short-term temporary emission exceedance cases described in sections 7 and 8, or an interim indication of ongoing compliance in the case of sensor failure described in sections 9 to 11.

As soon as possible after evidence of a malfunction (e.g. alarm is triggered), the ship should take action to identify and remedy the malfunction.

The ship operator should follow the process to identify and remedy the malfunction in the Exhaust Gas Cleaning System – Technical Manual that is approved at the time the EGCS is certified or in other documentation provided by the EGCS manufacturer.

The trouble-shooting process specified by the EGCS manufacturer should describe how to determine, within a reasonable amount of time, if the system itself is not working properly and whether the system fault must be addressed through adjustment and/or repair. The procedure would describe events that can trigger a monitoring alarm or other evidence of a scrubber malfunction (e.g. pump flow rates) and the troubleshooting process to identify and remedy the malfunction. The process should include at a minimum the following:

- A checklist for the operator to use to identify a malfunction; and

- A list of remedial actions that can be taken to resolve the malfunction after it is identified.

An EGCS malfunction event should be included in the EGCS Record Book including the date and time the malfunction began and, if relevant, how it was resolved, the actions taken to resolve it and any necessary follow-up actions.

A system malfunction that cannot be rectified is regarded as an accidental breakdown. The ship should then change over to compliant fuel oil if the EGCS cannot be put back into a compliant condition within one hour. If the ship does not have compliant fuel oil or sufficient amount of compliant fuel oil on board, a proposed course of action, in order to bunker compliant fuel oil or carry out repair works, should be communicated to relevant authorities including the ship's administration, for their agreement.

4. Short-term exceedances.

A short-term temporary emission exceedance is an exceedance of the applicable Emissions Ratio that may occur due to the EGCS dynamic response when there is a sudden change in the exhaust gas flow rate to the EGCS. There may be a short period during which the measured emission values might indicate that the applicable Emissions Ratio limit has been exceeded.

This is a common behavior of monitoring equipment and EGCS dynamic response (due to a sudden change in exhaust gas flow rate). A time lapse between when the sensor takes its reading and when the unit responds may trigger an alarm from the continuous emission monitoring device even though the EGCS has not malfunctioned. Thus, transitory periods and isolated spikes in the recorded output do not necessarily mean exceedance of emissions and should therefore not be considered as a breach of the requirements.

The typical operating conditions that may result in a short-term temporary emission exceedance should be specified by the EGCS manufacturer in the EGCS Technical Manual that is approved at the time the EGCS is certified.

5. Interim indication of ongoing compliance in the case of sensor failure.

When running on a fuel oil with a constant sulphur content and at constant washwater engine load ratio, all parameters monitored according to the 2015 EGCS Guidelines (MEPC.259(68)) (i.e. Emission Ratio, washwater pH, etc.) will be in a certain interrelation, all depending on each other. If one of the parameters changes, some other(s) will necessarily also have to change.

This interrelation also serves as an indicator of instrumentation malfunction; i.e. if a single sensor signal starts to deviate or even does not display, the effect on the other parameters may indicate whether the change in signal is caused by sensor failure or whether the performance of the EGCS itself has changed. If the other parameters are continuing at the normal levels, it is an indication that there is only an instrumentation malfunction rather than non-compliance with regard to the levels allowed in the exhaust gas and the discharge water.

If a malfunction occurs in the instrumentation for the monitoring of Emission Ratio or discharge water (pH, PAH, Turbidity), the ship should keep records of interim indication for demonstrating compliance. The documentation and actions should include (but are not limited to):

- The manual or automatic recording of the data at the time of malfunction may be used to confirm that all other relevant data as recorded for the performance of the EGCS are showing values in line with values prior to the malfunction;
- The ship operator should record the sulphur content of the various grades of fuel oil used in the affected fuel oil combustion units from the time when the malfunction started;
- The ship operator should log the malfunctioning of the monitoring equipment and (for Scheme A) record all parameters that might be suitable to indicate compliant operation. This record could serve as an alternative documentation demonstrating compliance until the malfunction is rectified; and
- The monitoring equipment that has suffered a malfunction should be repaired or replaced as soon as practicable.

6. Notifications to relevant Authorities.

Any EGCS malfunction that lasts more than one hour or repetitive malfunctions should be reported to the flag and port State's Administration along with an explanation of the steps the ship operator is taking to address the failure. At their discretion, the flag and port State's Administration could take such information and other relevant circumstances into account to determine the appropriate action to take in the case of an EGCS malfunction, including not taking action.

7. Crew preparation.

It is crucial and of vital importance the constant training of the crews that allows familiarization with the operational and safety procedures that allow a proper, effective and correct implementation on board the ships of the transition to the IMO 2020. In this particular case its necessary special training in Exhaust Gas Cleaning System operation, maintenance and repair on board.

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Inquiries concerning the subject of this Circular or any other request should be directed to:

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