INTERNATIONAL MARITIME ORGANIZATION

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SUB-COMMITTEE ON POLLUTION PREVENTION AND RESPONSE
13th session
Agenda item 13

PPR 13/13/3
19 December 2025
Original: ENGLISH
Pre-session public release: ☒

REVIEW OF THE IBTS GUIDELINES AND AMENDMENTS TO THE IOPP CERTIFICATE AND OIL RECORD BOOK

Comments on document PPR 13/13

Submitted by CESA

SUMMARY

Executive summary:	This document underscores the need to limit the quantity of oil released through forced evaporation and proposes establishing this limit as equivalent to the 15 ppm oily bilge water discharge requirement.
Strategic direction, if applicable:	2
Output:	2.13
Action to be taken:	Paragraph 12
Related documents:	PPR 13/13; PPR 7/22/Add.1; PPR 11/11; PPR 12/9, PPR 12/9/1; MEPC 78/17, MEPC 78/9; MEPC 69/INF.24 and PPR 6/INF.17

Introduction

1 This document is submitted in accordance with the provisions of paragraph 6.12.5 of the *Organization and method of work of the Maritime Safety Committee and the Marine Environment Protection Committee and their subsidiary bodies* (MSC-MEPC.1/Circ.5/Rev.6) and comments on document PPR 13/13 (China et al.).

Discussion

2 MEPC 78 agreed, in principle, that forced evaporation was acceptable as a means for the disposal of oily bilge water. Forced evaporation in relation to "oily bilge water" has not been described by MARPOL Annex I and its associated documents, and hence the acceptance of it remains uncertain.

3 Document PPR 13/13 proposes draft amendments to MARPOL Annex I to include a new regulation 12B to reflect the in-principle agreement. However, CESA is of the view that the physical fact that oil evaporates at lower temperatures than water should be considered and stresses that an amendment of MARPOL Annex I to include forced evaporation must assure that oil is not evaporated beyond reasonable amounts.

4 Document PPR 6/INF.17 (Sweden) documented that when evaporating an oily water mixture, the oil in the water is also evaporated, and especially the lighter fractions such as diesel. The testing of untreated oily water mixture samples drawn from ships in operation resulted in approximately 15,000 ppm for the brown oil/water mixture sample and approximately 5,900 ppm for the black oil/water mixture sample (converted into ppm by volume). Oily bilge water typically contains brown and grey oil water mixtures whereas oil residues (sludge) typically only contain black oil.

5 Forced evaporation of oily bilge water should, in the view of CESA, be seen as a means equivalent to the 15 ppm discharge requirement, aligning it with current regulations.

6 It is highly likely that water led to the service tank for evaporation will contain more than 15 ppm oil in water because:

.1 if forced evaporation is used as a means, the proposed new regulation 12B requires the presence of a holding tank or similar which collects water that has been rejected for discharge by the 15 ppm oil content meter; and

.2 if a bilge water separation unit is used, its water fraction is not required to be tested for 15 ppm oil in water.

7 The construction of the oily bilge water holding tank and/or the bilge separation unit alone, therefore, does not provide the guarantee that water led to the service tank for evaporation will contain less than 15 ppm oil in water, and other safeguards should be considered.

8 There are several options available to establish 15 ppm oil content equivalent in relation to forced evaporation:

.1 the inlet to the oily bilge water service tank could be equipped with a 15 ppm oil content meter;

.2 the vent mast could be equipped with a hydrocarbon sensor and correlate the results to ppm oil in water; however, the correlation calculation can be omitted if the hydrocarbon content limit is set to zero; and

.3 the service tank could be type approved.

9 Moreover, safety aspects of the service tank (or similar tank) should be appropriately considered, including the prevention of flammable vapours and explosive atmosphere, and proper training of crew.

10 Furthermore, CESA is of the view that the practice of evaporating water from oil residues (sludge) prior to incineration or combustion in a boiler ought to be reconsidered to avoid direct emissions to the atmosphere.

Proposal

11 Based on the above discussion, it is proposed to:

.1 Amend the proposed draft regulation 12B provided in paragraph 10 of document PPR 13/13 to include the 15 ppm oil in water equivalence. The proposed amendments are set out in the annex to this document.

.2 For clarity purposes, include an oil content meter prior to the oily bilge water service tank in the figure of document PPR 13/13, annex 3, as a guidance on how to meet compliance according to proposed regulation 12B.4*bis*.

Action requested of the Sub-Committee

12 The Sub-Committee is invited to consider the comments in this document, in particular the proposals in paragraph 11 and the annex, and take action as appropriate.

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ANNEX

PROPOSED AMENDMENTS TO PARAGRAPH 10 OF DOCUMENT PPR 13/13 PARAGRAPH 10 AND ANNEX 3.

Additional text is underlined.

PPR 13/13, paragraph 10:

"**Regulation 12B**

…

4*bis* If forced evaporation is used as other acceptable means, it should be verified that the oily water led to the oily bilge water service tank or similar tank does not exceed 15 ppm oil in water monitored on a continuous basis, or the hydrocarbon emissions from the vent mast monitored on a continuous basis do not exceed what correlates to 15 ppm oil in water, or by tank type approval that the boil-off gas contains less than 15 ppm oil in water equivalence.

…"

PPR 13/13, annex 3 (inclusion of 15 ppm oil content meter prior to the oily bilge water service tank):