

# Guidance to SIRE 2.0 Key Points

Ref: 018

## 6.1.6 MARPOL Annex VI NO<sub>x</sub> Compliance and Record Keeping (NEW) / TMSA 10.1.3

### 6.1.6. Were the documents and records required by MARPOL Annex VI Regulation 13 for the control of NO<sub>x</sub> and associated emissions in good order?

#### Short Question Text

MARPOL Annex VI NO<sub>x</sub> Compliance and Record Keeping.

#### Vessel Types

Oil, Chemical, LPG, LNG

#### ROVIQ Sequence

Chief Engineer's Office, Documentation, Engine Control Room

#### Publications

IMO: ISM Code

IMO: MARPOL

IMO: MEPC.312(74) Guidelines for the Use of Electronic Record Books under MARPOL

IMO: NO<sub>x</sub> Technical Code (2008)

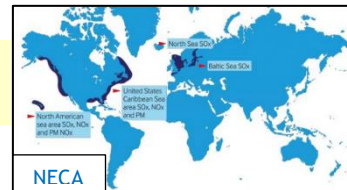
Technical Code on Control of Emission of Nitrogen Oxides from Marine Diesel Engines

IMO: Resolution MEPC 307(73) 2018 Guidelines for the discharge of exhaust gas recirculation (EGR) bleed-off water



#### Objective

To ensure the documents and records required by MARPOL Annex VI for the control of NO<sub>x</sub> and associated emissions are maintained as required.



#### Potential Grounds for a Negative Observation

- There were no company procedures for maintaining the documents and records required by MARPOL Annex VI Regulation 13 and the NO<sub>x</sub> Technical Code.
- The accompanying officer was not familiar with the company procedures for maintaining the documents and records required by MARPOL Annex VI Regulation 13 and the NO<sub>x</sub> Technical Code.
- The accompanying officer was not familiar with the NO<sub>x</sub> abatement system installed on board, or its operation.
- The accompanying officer was not familiar with the actions to be taken in the event that a NO<sub>x</sub> abatement system fitted suffered a failure that could not be rectified within one hour.
- Technical Files were not available for all diesel engines listed in paragraph 2.2.1 of the vessel's International Air Pollution Prevention (IAPP) Certificate.
- Record Books of Engine Parameters were not available for all those engines required to undergo Engine Parameter Checks at initial and subsequent surveys.
- Record Books of Engine Parameters had not been maintained in accordance with company procedures.
- On a vessel constructed after the applicable date, there were no records of diesel engine Tier and on/off status on entering/leaving an NECA.
- There was evidence that Tier II engines had been operated in an applicable NECA.
- On a vessel with Exhaust Gas Recirculation equipment, records of the discharge of solid residues and bleed-off water had not been maintained in accordance with company procedures.
- The accompanying engineer officer was not familiar with the strategy for monitoring the catalyst condition/degradation in an SCR system installed on board, and/or its implementation and associated equipment.
- There were no records available, paper or electronic, of continuous or spot-checked NO<sub>x</sub> levels associated with an SCR system fitted on board.
- Where the vessel was using an electronic record book, there were no instructions available for the use of the electronic record book system.

Process

Human

Hardware

Process

Human

Hardware