

News Summary



To all Members

**The Britannia Steam Ship
Insurance Association Limited**

Managers

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USA Vessel General Permit (VGP) – lubricants

Much has been written about the new VGP which will come into force on 19 December 2013 and which deals with pollutants released into the sea from ships. We refer Members to previous editions of *Britannia News Summary* numbers 477 and 478 from April and May 2013:-

www.britanniapandi.com/en/news_and_publications/britannia-news-summary/bns-archives/bns-2013/index.cfm

In March this year the list of permitted substances and the quantities allowed for discharge was amended and one of the changes relates to lubricants used in any of the ship's equipment (such as propulsion systems and deck machinery) where there is a possibility that the lubricant may escape over the side of the ship and into the sea (i.e. oil-to-sea interfaces). All lubricants must now be environmentally acceptable lubricants (EALs) unless using such an EAL would be 'technically unfeasible'. There is a definition of an EAL on the US Environmental Protection Agency (EPA) website: http://www.epa.gov/npdes/pubs/vgp_environmentally_acceptable_lubricants.pdf

The ship must identify all the oil-to-sea interfaces and document all lubricants used. If an EAL is not used, the ship must state why the use of an EAL is 'technically unfeasible'. One problem that has been identified is that the EALs may not be compatible with some makes of seals, particularly conventional rubber seals. In such circumstances, Members may be able to make use of the 'technically unfeasible' proviso, but only until the next planned dry docking when seals can be replaced. Members should carefully document any such decisions and be aware that the US authorities are likely to carry out checks, with severe penalties imposed for infringement of the regulations.

MARPOL Annex V: some technical guidance from ITOPE

Further to various recent publications on the subject of the revised MARPOL Annex V, ITOPE has published an article called "Bulk cargo hold wash water discharge and cargo declarations under MARPOL Annex V" which Members may find useful as it provides some practical and technical advice about the requirements under the regulation:

www.itopf.co.uk/information-services/publications/papers/MARPOLAnnexV.html

"Bin burnt" soya beans loaded in Santos, Brazil

We have received a number of reports of soya bean cargoes being loaded in a "bin burnt" condition – named from the cargo being stored in shore-side silos/bins which have been subject to some form of self heating. The problem is perhaps two fold in that there is often an acceptable allowance for bin-burnt cargoes in the cargo sale contract but it is difficult for ship's crews to determine whether this is being exceeded: this is perhaps a quality issue. Secondly, there have been reports of a large silo fire in Santos earlier this year and since then large quantities of burnt beans appear to have been mixed with the "on spec" cargo in the loading spout. The burnt beans are usually blackened and discoloured and can be either mixed homogeneously with sound beans or found in layers. There are suspicions that the loading of larger quantities may take place at night.

Members are advised to ensure their crew make diligent, regular inspections of the cargo as it is loaded into the ship. Visual inspection should detect the burnt beans and lead to the subsequent clausuring of the mate's receipt. The Managers should be contacted if "bin burnt" soya beans are detected in order for a P&I surveyor to be appointed.

If Members require any further assistance they should contact the Managers or the local Correspondent.

A copy of this edition of Britannia News Summary and previous editions published over the last twelve months are available on the Britannia website (www.britanniapandi.com) in the PUBLICATIONS section.