



Technical Circular

No.: 074/2020

Date: 13th May 2020

Subject: IMO Circular on 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))

1. The Marine Environment Protection Committee vide Circular – MEPC.1/Circ.883 has approved the 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)).
2. An EGCS unit may be deemed to be faulty when its emissions and discharges exceed the standard as prescribed in the 2015 EGCS Guidelines.
3. Any malfunction that lasts for more than one hour or in case of repetitive malfunctions, in pursuant to regulation 5.6 of Annex VI of the MARPOL Convention, it is imperative that such a situation is reported to the flag Administration of the vessel, to the vessel's Class and to the relevant port State control competent authority, along with an explanation of the steps the ship operator is taking to address the failure.
4. An EGCS malfunction event is to be duly recorded in the EGCS Record Book including the date and time of the malfunction, along with a description of the actions taken to resolve it and any follow-up actions, as necessary.
5. Short term temporary exceedances of the applicable emissions ratio and discharge parameters that occur as a result of EGCS dynamic responses due to sudden changes in the exhaust gas flow and/or wash water flow characteristics, do not necessarily mean that the system is malfunctioning. There are various parameters being monitored and recorded that are normally interrelated. Hence if the value of one parameter changes, this will result in a corresponding change in one of the other parameters. Such interrelation of parameters will provide an indication as to whether the EGCS is faulty or it is only a failure of one of the sensors.
6. The ship operator should follow the process to identify and remedy the malfunction in the approved Exhaust Gas Cleaning System – Technical Manual (ETM) that is approved at the time the EGCS is certified or in other documentation provided by the EGCS manufacturer. Typical operating conditions that may result in such short term temporary exceedance would be specified in the ETM Manual.

7. A EGCS 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, is to be communicated to relevant authorities including the ship's Administration, for their agreement.
8. Ship Owners/ Operators and masters are advised to be guided by above.

Enclosure: IMO Circular – MEPC.1/Circ.883, dated 21 May 2019.

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MEPC.1/Circ.883
21 May 2019

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))

1 The Marine Environment Protection Committee, at its seventy-fourth session (13 to 17 May 2019), approved the *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))*.

2 Member Governments are invited to bring the annexed Guidance to the attention of Administrations, port State control authorities, industry, relevant shipping organizations, shipping companies and other stakeholders concerned.

ANNEX

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))

System malfunction

1 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.

2 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.

3 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.

4 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:

- .1 a checklist for the operator to use to identify a malfunction; and
- .2 a list of remedial actions that can be taken to resolve the malfunction after it is identified.

5 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.

6 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.

Short-term exceedances

7 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 behaviour 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.

8 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.

Interim indication of ongoing compliance in the case of sensor failure

9 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.

10 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.

11 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):

- .1 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;
- .2 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;
- .3 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
- .4 the monitoring equipment that has suffered a malfunction should be repaired or replaced as soon as practicable.

Notifications to relevant Authorities

12 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.