



SUB-COMMITTEE ON BULK LIQUIDS
AND GASES
14th session
Agenda item 8

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CONSIDERATION OF IACS UNIFIED INTERPRETATIONS

Use of sludge oil during the warming-up process of shipboard incinerators

Submitted by the International Association of Classification Societies (IACS)

SUMMARY

Executive summary:	This document presents arguments for introducing sludge oil into type-approved continuous-feed shipboard incinerators during their warming-up process and seeks clarification from the Sub-Committee on the proper interpretation of regulation 16.9 of MARPOL Annex VI
Strategic direction:	2
High-level action:	2.1.1
Planned output:	2.1.1.4
Action to be taken:	Paragraph 7
Related documents:	Resolutions MEPC.176(58) and MEPC.76(40)

Introduction

- 1 MARPOL Annex VI regulation 16.9, as per resolution MEPC.176(58):
 - .1 prohibits *waste* to be fed into a continuous-feed shipboard incinerator when the combustion chamber gas outlet temperature is below the minimum allowed temperature of 850°C; and
 - .2 requires batch-loaded shipboard incinerators to be designed so that the gas outlet temperature in the combustion chamber gas outlet shall reach 600°C within 5 minutes after start-up and will thereafter stabilize at a temperature not less than 850°C.

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Discussion

2 IACS Members have noted that numerous incinerators, while being type-approved to operate at combustion chamber gas outlet temperatures not less than 850°C as per resolution MEPC.76(40), introduce sludge during the warming-up process on board the ship in accordance with the operating manual, which is not required to be approved under MARPOL VI/16.7. The introduction of the sludge oil is governed either by a temperature sensor or timer.

3 In this regard, it is noted that sludge oil, which is considered waste, is used during the warming-up process of continuous-feed shipboard incinerators to raise the temperature of the combustion chamber from approximately 500°C (this temperature is achieved by burning diesel oil during the primary warming-up process) to not less than 850°C, in order to reduce the time period for the warming-up. If diesel oil were to be solely used for the warming-up process, more time would be needed.

4 IACS believes that the minimum combustion chamber gas outlet temperature of 850°C should be understood to be the minimum normal operating combustion chamber gas outlet temperature. This is based on Appendix IV of MARPOL VI, which requires both continuous-feed and batch-loaded shipboard incinerators to operate with a “Combustion chamber flue gas outlet temperature range: 850 – 1200 degrees Celsius”. The use of sludge oil during the warming-up process is also considered to be in line with the required emission standard specification in resolution MEPC.76(40), which states that the “Flue gas outlet temperature and O₂ content should be measured during the combustion period, and not during the preheating or cooling periods”.

5 Based on paragraphs 3 and 4 above, IACS seeks clarification from the Sub-Committee as to whether it is acceptable to allow sludge oil to be burned during the warming-up process to achieve the minimum operating combustion chamber gas outlet temperature of at least 850°C in the combustion chamber of continuous-feed shipboard incinerators.

6 If the Sub-Committee agrees with the proposal in paragraph 5 above, then IACS would be prepared to submit a relevant IACS Unified Interpretation to MEPC 61 for consideration.

Action requested of the Sub-Committee

7 The Sub-Committee is invited to consider the above information and take action as appropriate.