

Summary of the Detention Case 46-02-2025

I. General

Ground for detention

The ship was detained due to the following detainable deficiency:

14104 Oil filtering equipment - Oily Water separator defective.

Dispute

The flag State did not agree with the detention by the port State Authority and expressed views that:

1. The vessel's Oily Water Separator (OWS) system was observed to display a "no flow" alarm on the 15ppm bilge alarm control panel during the PSC inspection. This alarm is a built-in fail-safe feature that automatically prevents discharge by keeping the 3-way valve closed when no sample flow is detected;
2. The manufacturer has confirmed that the OWS is designed in accordance with IMO resolution MEPC.107(49) and that activation of the "no flow" alarm indicates the correct function of the equipment. When triggered, the system ensures that bilge water cannot be discharged overboard, and is in full compliance with the fail-safe requirements under MEPC.107(49);
3. The system therefore performed its intended function - to prevent overboard discharge of untreated bilge water, despite the sampling line to the flow switch being blocked. The blockage triggered a valid protective response from the system, and not a failure of the pollution prevention equipment itself;
4. In accordance with section 1.7.4 of Resolution A.1185(33) – Procedures for Port State Control, 2023, a detention is warranted only when the ship is deemed unfit to proceed to sea without posing a danger to safety or an unreasonable threat to the marine environment; however, taking account of the facts and findings in this case, the conditions on board did not constitute such risk or justify the severity of a detention; and
5. The crew successfully restored the OWS to working in order soon after the disembarkation of the PSCO.

Based on the above, it is requested to downgrade the action code for the deficiency from 30 to 17.

The port State Authority is of the opinion that:

1. In accordance with the Guidelines for the detention of ships (Appendix 2 to Resolution A.1185(33) – Procedures for Port State Control, 2023, absence, serious deterioration or failure of proper operation of the oily-water filtering equipment, the oil discharge monitoring and control system or the 15 ppm alarm arrangements would be a detainable deficiency; at the time of inspection, the OWS was tested in recirculation mode, and the system failed to operate as expected, with an active alarm indicating no flow, such is considered the failure of proper operation of the oily-water filtering equipment;

2. The PSCO had given time to the crew to fix the problem before completion of the inspection but, until disembarkation of the PSCO, the crew could not identify the cause of the failure; and

3. The evidence available at the time of the inspection, particularly the crew's dismantling of the OWS pump, clearly indicates that the crew were unable to demonstrate the proper running of the OWS when requested.

Based on the above, the detention was appropriate and correct.

II. Opinions of the panel

The panel members reviewed the relevant information and materials received. As the result of evaluation, panel members reached unanimous opinions as follows:

1. The "no flow" alarm on the 15ppm bilge alarm control panel observed in this case is falling in the areas under MARPOL Annex I considered as failure of proper operation of the oily-water filtering equipment in accordance with the Guidelines for the detention of ships (Appendix 2 to Resolution A.1185(33) – Procedures for Port State Control, 2023;

2. At the beginning of inspection, the issue about oily-water filtering equipment was not identified by the ship before the inspection and the crew was unable to trigger the cause and to fix the problem before completion of the inspection;

3. Although no specific guidance had been provided by the OWS manufacturer regarding troubleshooting of a blocked flow switch, the evidence of the crew dismantling the OWS pump demonstrated that the operational failure extended beyond routine troubleshooting and that the crew were unable to demonstrate the proper operation of the OWS as requested;

4. Based on the above, the detention is considered justified from both procedural and technical aspects.

III. Conclusion

The panel members are of the unanimous opinion that the detention was justified. Therefore, the port State Authority would not be asked to reconsider the decision of the detention.