



TECHNICAL CIRCULAR No. 536 of 06th February 2019

To:	All Surveyors/Auditors
Applicable to flag:	All Flags
Sewage Treatment with No-Sludge Production	
Reference:	MARPOL Annex IV

Sewage Treatment with No-Sludge Production

About pollution by sewage from ships it is a widening gap between the marine rules and realities. There is several non-conformity issues associated with some certified sewage treatment plants.

Sewage is an inevitable by-product generated from a wastewater purification process. The approval assessment bodies have not provided answers but rather they point out the uncertainties in the current type approval process for marine sewage treatment plants. They called for reviews by the approval assessment bodies and their respective Administrations.

Sewage pollution control is one of the first environmental initiatives in human history. Sewage treatment plants protect the aquatic environment. They turn raw sewage into clear and less harmful effluent. They also produce sewage sludge as a by-product. The treatment technologies are supported by wastewater science and engineering, whilst their compliance performance is assured by effective regulatory frameworks. A significant part of wastewater industry concerns sewage sludge: its characteristics, production, management and disposal, including possible re-use as a natural resource.

Some people in the marine industry disagree. Some marine manufacturers claim their sewage treatment plants do not produce sludge. Unfortunately, conformity assessment bodies have approved their equipment by crediting them with IMO and MED certificates. Thus, they have certified impossibilities, and created certified “magic boxes.” These magic boxes contravene

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science. They are non-conformities.

Magic boxes are easy to spot there is an absence of sludge separation features within the treatment process.

The sewage sludge, instead of being separated from the treatment process, is flushed out in the effluent. These magic boxes would not be able to perform no matter how well they are operated. Many are concerned about their poor performance status [6]. MEPC.227(64) Guideline tried to tighten the abusive use of dilution water during performance tests, and yet this has not stopped the impossibilities from being “proven” by “good laboratory results.” Certificates have become licenses to pollute.

As a way of keeping the status quo, some say none of the Guidelines explicitly prohibits no-sludge claims. This is farcical and brings the approval regime into total contradiction to the IMO’s intentions. Meanwhile, the non-conformities are spreading; the gap between rules and realities is widening.

It may be time for the IMO, its Member States and the assigned approval assessment bodies to identify and to acknowledge this issue.

REFERENCES:

- MARPOL Annex IV

- ATTACHMENTS: No

kindest Regards,
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