TECHNICAL CIRCULAR No. 797 of 5th October 2023

To	All Surveyors/Auditors. All flags
Title	**OSW-Stop Valve**
Reference	MARPOL- IMO Resolution MEPC.107(49).

Stop Valve on OWS Sampling Line

Three-CONARINA class sister general cargo vessels each received a deficiency from Port State Control, USCG.

The deficiency was the provision of an isolation stop valve in the sampling line to the 15 parts per million bilge alarm system.

The *oily water separator,* or OWS, bilge alarm could be isolated from the overboard discharge line.

The oily water separator is still permitted to operate by discharging bilge water continuously.

The oil content may exceed the regulatory limit of 15 parts per million.

Valves 3 and 4 are used for cleaning the bilge alarm with fresh water.

The bilge alarm is activated when fresh water is used for cleaning.

The operation of these valves is more controlled as the alarm will sound during the cleaning operation.

The stop valve, indicated by the red arrow, does not have an alarm or control of its position.

Port State Control indicated the installation of the stop valve did not comply with 6.2.2 of IMO Resolution MEPC.107(49).

The arrangement should allow for the extraction of truly representative samples of effluent from the OWS discharge line.

If the stop valve is closed, the required effluent samples cannot be extracted for analysis by the bilge alarm device.

Port State Control required removing the stop valve or providing a flow switch to activate the alarm when the 15 parts per million bilge alarm device is isolated.

Suppose the oily bilge water is discharged overboard without checking that its oil content does not exceed 15 parts per million.

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In that case, the discharge may pollute the waters where the vessel is navigating or anchored.
The flag Administration had approved the oily water separator for compliance with MARPOL without any comment about the provision of the isolation stop valve.
However, the deficiency pointed out by Port State Control refers to the system's operation by the crew.
To mitigate the risk of improper operation of the isolating valve in the sampling line, the surveyor proposed to seal the valve in the open position.
Port State Control considered the seal in the open isolating valve as an acceptable solution and removed the deficiency from the vessels.

REFERENCES:
- MARPOL – Case study.

ATTACHMENTS: No

Kindest Regards,
CONARINA Technical Office

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