



RUSSIAN MARITIME REGISTER OF SHIPPING

CIRCULAR LETTER

No. 313-04-1276c

dated 23.10.2019

Re:

amendments to the Guidelines on the Application of Provisions of the International Convention MARPOL 73/78, 2019, ND No. 2-030101-026-E

Item(s) of supervision:

ships under construction and in service

Entry-into-force date:

01.01.2020

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Appendices:

Appendix 1: information on amendments introduced by the Circular Letter

Appendix 2: text of amendments to Part VI "Ship's Equipment and Arrangements for the Prevention of Air Pollution"

Director General

Konstantin G. Palnikov

Text of CL:

We hereby inform that in connection with entry in force of IACS unified interpretations (UI) MPC98 and IMO circular MEPC.1/Circ.795/Rev.4, the Guidelines on the Application of Provisions of the International Convention MARPOL 73/78, 2019 shall be amended as specified in the Appendices of the Circular Letter.

It is necessary to do the following:

1. Familiarize the surveyors of the RS Branch Offices and interested organizations in the area of the RS Branch Offices' activity with the content of the Circular Letter.
 2. Apply the provisions of the Circular Letter.
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List of the amended and/or introduced paras/chapters/sections:

Part VI: para 2.2.3

Person in charge: Mikhail V. Petrov

313

+7(812)570-43-11

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**Information on amendments introduced by the Circular Letter
(for inclusion in the Revision History to the RS Publication)**

Nos.	Amended paras/chapters/sections	Information on amendments	Number and date of the Circular Letter	Entry-into-force date
1	Part VI, para 2.2.3	Requirements have been specified considering IACS UI MPC98 and IMO circular MEPC.1/Circ.795/Rev.4	313-04-1276c of 23.10.2019	01.01.2020

GUIDELINES ON THE APPLICATION OF PROVISIONS OF THE INTERNATIONAL CONVENTION MARPOL 73/78, 2019

ND No. 2-030101-026-E

PART VI. SHIP'S EQUIPMENT AND ARRANGEMENTS FOR THE PREVENTION OF AIR POLLUTION

2 CONTROL OF EMISSIONS FROM SHIPS

2.2 NITROGEN OXIDES (NO_x)

1 **Para 2.2.3** is replaced by the following text:

"2.2.3 For a major conversion involving the replacement of a marine diesel engine with a non-identical marine diesel engine, or the installation of an additional marine diesel engine, the standards in regulation 13 of Annex VI to MARPOL 73/78 in force at the time of replacement or addition of the engine shall apply.

In accordance with IACS UI MPC98 and IMO circular MEPC.1/Circ.795/Rev.4, the term "time of the replacement or addition of the engine" shall be taken as the date of:

.1 the contractual delivery date of the engine to the ship if the engine is fitted onboard and tested for its intended purpose within six (6) months after the date specified in sub-paragraphs of regulation 13.5.1.2 of Annex VI to MARPOL 73/78, as appropriate; or

.2 in the absence of a contractual delivery date, the actual delivery date of the engine to the ship if the engine is fitted onboard and tested for its intended purpose within six (6) months after the date specified in sub-paragraphs of regulation 13.5.1.2 of Annex VI to MARPOL 73/78, as appropriate, provided that the date is confirmed by a delivery receipt; or

.3 the actual date that the engine is tested on board for its intended purpose in the event the engine is fitted onboard and tested for its intended purpose on or after six (6) months from the date specified in sub-paragraphs of regulation 13.5.1.2 of Annex VI to MARPOL 73/78, as appropriate.

The above dates are the dates of major conversion and shall be entered in the Supplement to IAPP Certificate (form 2.4.2.3) in the item 8.a in line "13.2.1.1 & 13.2.2".

If the engine delivery contract is concluded before the date specified in sub-paragraphs of regulation 13.5.1.2 of Annex VI to MARPOL 73/78, as appropriate, or if, in the absence of a contractual delivery date, the engine is delivered on board (the delivery date is confirmed by a delivery receipt) before that date, but not tested before purpose within six (6) months after the date specified in sub-paragraphs of regulation 13.5.1.2, due to unforeseen circumstances beyond the control of the shipowner, then the "unforeseen delay in delivery" may be considered by the Administration in a manner similar to the provisions of paragraph 4 of the Unified Interpretations to MARPOL 73/78 Annex I.

In the case of replacement engines only (on the date specified in sub-paragraphs of regulation 13.5.1.2 or in regulation 13.5.1.3 of Annex VI to MARPOL 73/78), if it is not possible for such a replacement engine to meet the standards set forth in regulation 13.5.1.1 of Annex VI to MARPOL 73/78 (Tier III), then that replacement engine shall meet the standards set forth in regulation 13.4 of Annex VI to MARPOL 73/78 (Tier II). The criteria of when it is not possible for replacement engine to meet the standards set forth in regulation 13.5.1.1 of Annex VI to MARPOL 73/78 are given in the 2013 Guidelines as Required by Regulation 13.2.2 of MARPOL Annex VI in Respect of Non-Identical Replacement Engines Not Required to Meet the Tier III limit (refer to IMO resolution MEPC.230(65)). The following criteria may be applied:

.1 a replacement engine of similar rating complying with Tier III is not commercially available; or

.2 the replacement engine, in order to be brought into Tier III compliance, needs to be equipped with a NO_x reducing device which due to:

size cannot be installed in the limited space available on board; or

extensive heat release could have adverse impact on the ships structure, sheeting, and/or equipment whilst additional ventilation and/or insulation of the engine-room/compartment will not be possible;

.3 the replacement engine cannot be installed due to its dimensions and weight, as well as due to the fact that it cannot be integrated with the ship components (drive shafts, reduction gears, cooling systems, propeller shafts, etc.), systems and equipment;

.4 adjustments of the replacement engine, which shall be equipped with the NO_x reducing device, do not allow the joint operation of the engine and this device;

as well as other criteria indicated in IMO Guidelines mentioned above.

For a major conversion involving the replacement of a marine diesel engine with a non-identical marine diesel engine or the installation of an additional marine diesel engine on or after 1 January 2000 but before 1 July 2010 the provisions of IACS UI MPC20 (Rev.1 Apr 2014) shall apply.

As regards the application of the term "identical replacement engines", the Unified Interpretations to MARPOL 73/78 Annex VI shall be considered according to IMO circular MEPC.1/Circ.795/Rev.4."