БЪЛГАРСКИ КОРАБЕН РЕГИСТЪР
Варна 9000, Южна промишлена зона South Industrial Zone, Varna 9000, Bulgaria
BULGARIAN REGISTER OF SHIPPING

BRS CIRCULAR

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Date:	**26.06.2026**	**Preparation for Port State Control Inspections – MARPOL Annex I (Machinery Spaces)**
Substitutes	-	
Amendment to	-	
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Notice to: Ship Owners/ Managers/ Operators/ Surveyors/

Introduction

BRS Class would like to draw the attention of Shipowners, Managers, Masters and Chief Engineers to the increased focus of Port State Control inspections on MARPOL Annex I compliance, particularly regarding machinery space operations, Oil Filtering Equipment (OWS/OFE) and Oil Record Book entries.

1. Oil Record Book (Part I)
The Oil Record Book should be maintained accurately and up to date at all times.
Particular attention should be given to:

- Consistency between sludge generation, transfer, disposal and retention records.
- Quantities recorded in the Oil Record Book matching the capacities of sludge and bilge tanks.
- Correct recording of discharges through the Oil Filtering Equipment.
- Availability of supporting documentation where applicable.

Any discrepancies, missing entries or unrealistic quantities may lead to a more detailed inspection.

2. Sludge and Bilge Management
Masters and Chief Engineers should ensure that:

- Adequate sludge tank capacity is available for the intended voyage.
- Sludge disposal arrangements are properly documented.
- Records clearly demonstrate how sludge has been managed (reception facilities, incineration, auxiliary boiler, etc.).
- Bilge water is handled in accordance with MARPOL requirements.
- Ships burning heavy fuel oil should be able to demonstrate reasonable sludge generation and disposal patterns.

3. Oil Filtering Equipment (OWS/OFE):

Before arrival at port, the following should be verified:

- OWS/OFE is fully operational.
- 15 ppm alarm is functioning correctly.
- Automatic stopping device operates as intended.
- Three-way valve functions properly.
- Relevant operating manuals and approval documentation are available onboard.
- Required calibration and survey records are available.

Crew members responsible for operation of the equipment should be familiar with its use and capable of demonstrating its operation if requested by PSC inspectors.

4. Machinery Space Inspection

PSC inspectors may conduct detailed examinations of:

- Bilge and sludge piping systems.
- Standard discharge connections.
- Overboard discharge arrangements.
- Physical condition and cleanliness of machinery spaces.

Particular attention will be given to detecting unauthorized modifications or bypass arrangements.

5. Crew Familiarity

Masters, Chief Engineers and engineering officers should be prepared to explain:

- Procedures for handling sludge and oily bilge water.
- Operation of the OWS/OFE system.
- Oil Record Book entry procedures.
- Arrangements for disposal to shore reception facilities.

Lack of familiarity with pollution prevention procedures may be considered a deficiency.

6. Common Deficiencies Leading to Detention

The following deficiencies may result in detention of the vessel:

- Inoperative OWS/OFE equipment.
- Defective 15 ppm alarm or automatic stopping device.
- Unauthorized bypass arrangements.
- Insufficient sludge or bilge tank capacity for the intended voyage.
- Missing or improperly maintained Oil Record Book.
- Serious inconsistencies between records and actual onboard conditions.

BRS Recommendation:

Bulgarian Register of Shipping Class strongly recommends that shipowners and managers conduct an internal MARPOL Annex I verification prior to port arrival, including review of Oil Record Book entries, sludge management records and operational testing of pollution prevention equipment.

Early identification and correction of deficiencies remains the most effective means of avoiding PSC deficiencies, delays and detention.