TECHNICAL MEMORANDUM

Date: May 2012

SUBJECT: BILGE AND SLUDGE TANK NAMING CONVENTION

BACKGROUND

When designing procedures for bilge and waste oil management and troubleshooting these systems it has become apparent that there is a tremendous amount of variation in the naming of tanks that collect those liquids. The great variety in tank names makes it difficult for crews, port engineering staff and inspectors to communicate on the subject and to verify the function of these tanks.

This has become particularly clear when an IOPP (International Oil Pollution Prevention) certificate review of a fleet of 20 vessels (with 7 classes of vessels) showed that there were over 15 bilge tank names and over 30 sludge tank names with some names that were used in both categories.

This document sets out a bilge and waste oil tank naming convention. It is expected that implementation of a standardized tank naming convention will result in a reduced level of confusion with regard to bilge and waste oil treatment and reduced workload when entering data and during inspections.

The "Practical Implementation" section of this document sets out the application of the naming convention on a specific fleet of vessels.

NAMING CONVENTION

The naming convention is designed to be hierarchal. Since the IOPP certificate distinguishes between "holding tanks for the retention of oily bilge water" (sections 2.5.2 and section 3.3) and "oil residue (sludge) tanks", there will be two types of tanks: Bilge Tanks and Sludge Tanks.

Bilge Tanks accept and hold bilge water and may be treated to various levels of pretreatment, and Sludge Tanks receive wastes that will be ultimately incinerated or delivered to shore.

When there is more than one tank with an identical function, the tank will receive a number, or preferably, will be provided with the tank's actual designated number.

As such, Bilge Holding Tank 2 (there is no need to write "No. 2") may be acceptable, but if the tank is already number designated 14P the preferred name will be Bilge Holding Tank 14P.

If there is a unique designated tank name, that name will always be included in the IOPP. As such, if there is one Sludge Tank aboard the vessel and this tank happens to have a unique number MA1, the tank's official name will be Sludge Tank MA1.

Bilge tanks may be further designated according to their function.

If a tank holds bilge water that has been pretreated to any extent, the tank is named Clean Bilge Tank.

The below listing shows presently acceptable bilge tank designations.

Similarly, sludge tanks may also be further designated, generally according to the source of the oil waste it receives. As such, a FO Sludge Tank will receive fuel oil sludge.

If a vessel has only one tank for holding waste oil, the tank will be named Sludge Tank, since it does not receive any type of specific waste oil.

If a vessel has two tanks that can receive any type of waste oil, the tanks will be named Sludge Tank 1 and Sludge Tank 2, or something like Sludge Tank 12P and Sludge Tank 13P if tank numbers are available.

There also may be other sludge tank names that have traditional names with specific functions and specifically allowed names are listed below.

Tank names are written with capitals and may be abbreviated as shown below.

APPROVED TANK NAMES

The following tank names may be used:

Bilge Tank Names:

Bilge Holding Tank (BHT): Any tank aboard the vessel that receives bilge water, often pumped directly from the vessel's bilges.

Clean Bilge Tank (CBT): A tank that receives bilge water that has received some level of pretreatment prior to going through the OWS.

Bilge Pretreatment Tank (BPT): A tank that is specially configured to perform bilge water pretreatment, such as to skim oil or to drain sediment.

Bilge Storage Tank (BST): A tank that may be fitted to hold bilge water on rare occasions when the OWS is not operable and is used as a storage tank that is not fitted in the normal OWS stream.

Sludge Tank Names:

Sludge Tank (ST): A tank that receives engine room waste containing significant amounts of oil.

FO Sludge Tank (FOST): A tank that receives mostly fuel oil sludge, such as separator drains.

LO Sludge Tank (LOST): A tank that receives mostly waste lube oil.

OWS Sludge Tank (OWSST): A tank that uniquely receives the oil that is separated in the OWS.

Incinerator Tank (IT): A tank that is specifically fitted to supply waste oil to the incinerator.

A tank that has a very specific use and very specific drainage content, upon approval by technical management, may carry a specific name. As such, **ME Scavenge Air Box Drain Tank (MESDT)** and **Soot Collection Tank (SCT)** are presently specifically approved.

Always request approval for tank names not specifically provided above.

Note: Any tank names containing names such as "Slop", "Residue", "Settling", "Waste" or "Service" are specifically retired in IOPP engine room bilge use and will need to be renamed as above. The term "Slop" will be reserved for cargo hold or tank cleaning waste.

Please also note that this naming convention was developed to provide a reader of the IOPP with some guidance on the type of treatment and storage system that exists aboard the vessel. As such an IOPP with a Bilge Holding Tank and a Clean Bilge Tank probably describes a vessel that has a mechanical treatment device of some sort that pretreats the bilge water. While an IOPP with a Bilge Holding Tank and a Bilge Pretreatment Tank, and no Clean Bilge Tank will probably have some tank that pretreats bilge water immediately prior to sending the bilge water to the OWS.

TANK NAME USEAGE

The above tank names will be provided in the IOPP certificate and will be written out in standard abbreviation with the full tank name behind it in parentheses.

For example: BHT14P (Bilge Holding Tank 14P)

All tank names will be provided in a specific sequence in the IOPP, and the ship is to use that sequence consistently in sounding logs and the ORB. The ship will have input in providing the listing sequence to facilitate the taking of soundings in the same sequence.

These names will be carried on all name tags, unless lack of space precludes the use of the full name at which time the standard abbreviation may be used. The abbreviation needs to be written in capital letters.

The full names, following the abbreviation, must be listed in the beginning of any log that records the tank levels on a regular basis (sounding log, ORB, possibly ER log), but once listed in the beginning of the log, the abbreviation may be used.

These abbreviations and names will also be entered into the trim and stability booklets, stability programs, and GA diagrams.

Even in scrap notebooks the proper abbreviation and/or names are to be used.

In the (hopefully rare) case that the abbreviation causes ambiguity, as when IT (Incinerator Tank) and IT (Information Technology) are used in the same sentence, the tank abbreviation can be written as ITk, which will specifically identify it as a tank (or use the full name). Only use this convention when specifically required for clarity.

In all correspondence that clearly deals with tanks the abbreviations can be used.

PRACTICAL IMPLEMENTATION

The above naming convention was used as the guide to develop a unified approach in the naming of IOPP tanks in the above mentioned fleet of 20 vessels. The vessels ranged from very old to quite recent vintage (2004) and included steam vessels and diesel ships.

After intense study it was found that wholesale adaptation of the convention was not altogether practical for many reasons, ranging from the difficulty of getting crews that had been long associated with these vessels to use the new names, confusions that might arise during the implementation period (it would be impossible to change all names at all ships at the same time), training factors (one crew would switch the name plates and the next crew would be confronted with the new names), the occasionally surprisingly large number of tank name changes (which would be in addition to earlier unofficial name changes) and plain depth of complexity when the names are changed (tank name changes involves drawing changes, manual changes, operating instruction changes, tank indicator name changes and valve wheel name changes)

Instead the operators chose a unified and hybrid approach as follows:

- 1. The series of new ships received complete tank name changes according to the above convention. For these ships it was considered to be worthwhile to make these vessels the example of the proper way to name tanks in the future.
- 2. The older ships received name changes that were recorded in the revised IOPP as the official standardized abbreviations only but would carry the old name in parentheses. The crew would be directed to apply the abbreviated name in all aspects of the ship's operation and over time the old name may simply disappear from use at which time the old name in parentheses can simply be removed from the IOPP. (And to make the IOPP identical in style to the newer vessels, the official full name can then be added.)

It is expected that, with occasional reminders to the crew and technical personnel, this process will result in consistent tank naming and a much more transparent and unified waste oil and bilge management process. From the day of implementation it will result in tank names that mean the same on all vessels in the fleet and will result in the most identical tank names within vessel classes.