

TECHNICAL MEMO

DATE: May 2012

SUBJECT: USE OF UNIFIED FORMAT STAMPS IN ORB RECORDING

During a senior office shipping company conference it was noted that there was limited uniformity in the way ORB's are filled out. To promote a unified approach, it was suggested that it may be helpful to use formal stamps that ORB recorders can stamp into the ORB in the proper location, which then leaves blanks that require specific details to be filled out. This tech memo further investigates this suggestion, and will be used to determine whether the use of such stamps will support the unified approach, reduce the shipboard workload and will meet all MARPOL and Flag State requirements.

BACKGROUND

Recent ORB recording procedure updates have required evaluation of many issues related to this subject including the following consideration:

1. IMO has issued MEPC. 1/Circ. 736, which provides guidelines for the recording of operations in the ORB.
2. MEPC. 1/Circ. 736 contains inconsistencies. For fleet use, only corrected copies of this circular should be used.
3. The MEPC circular has a rather inefficient entry format for the weekly 3.1 (sludge) tank volumes. This format requires the recorder to reenter dates and codes for as many tanks that are aboard the vessel. The USCG draft ORB shows a more efficient approach. This approach is adopted for the proposed stamp below. The USCG approach would require only one date entry (two if one counts the generally redundant date behind the officer signature) for all tanks instead of dates and signatures for each tank.
4. The USCG is developing a new oil record book. It is intended that this "Stamp" effort will be coordinated with the new ORB format. At this time the USCG draft is not in conformance with the MEPC circular. Generally the USCG draft appears to be a more efficient approach.
5. Vessel evaluations have indicated that, at present, there is little uniformity in ORB recording practices.
6. Increased uniformity, as far as can be fitted within a unified approach, should reduce crew workloads and increase transparency and review ease by management and regulatory inspectors.
7. Since ORB recording is not a continuous activity, but rather is a once per day, or less frequent, activity, it may take a significant amount of time and effort before all shipboard personnel has developed the most uniform approach.
8. Instituting a unified approach requires a feedback loop (ORB recorders are directed to do one thing, and there are checkers who catch aberrations and return with feedback to the ORB recorders) or requires a recording system that resists variations that break the unified approach (as would be promoted by stamps).
9. The ORB is supposed to be provided with handwritten entries. It is not clear if using a stamp to prompt crews to fill in the blanks still is considered to be a handwritten entry.

PROPOSED SOLUTION APPROACH:

The following solution approach is proposed:

1. Obtain full agreement and approval from all stake holders (ISM auditor, Flag State, ship operators, Crew).
2. Upon release of the new USCG ORB, selected entry codes (see proposed list of stamps) will be selected as "Stamp" entries.
3. Stamp entries will be produced for each ship. Most stamps will be identical for all ships. The weekly tank volume stamp will vary from ship to ship depending on the tanks listed on the IOPP.
4. Stamps will be issued for routine entries only (Suggest: Transfer between tanks, transfer to shore, OWS use, incineration, weekly tank volumes, bunkering, bilge well pumping)
5. The stamps will be issued to each ship including a procedure that will be attached to the ORB in case foreign flag state inspectors question the use of stamps.
6. The stamp procedure will be incorporated into the overall OWS/ORB procedure

Upon further review and discussion this approach may be adopted, modified or rejected in its entirety.

STAMP DESCRIPTION:

The following are sample stamp descriptions. Please note that the weekly tank volume design is different from the sample design in the MEPC circular.

The design for Oily water separator use; codes D 13, 14 and 15.1

06-DEC-2010	D	13	___ m ³ bilge water from _____,
			Cap: ___ m ³ , Ret: ___ m ³
		14	Start __:__ - Stop __:__
		15.1	___° 'N x ___° 'W - Start
			___° 'N x ___° 'W - Stop
			Signed: _____ Rank: _____

Note: the dark outline indicates the stamp border.

Also note that this stamp design does not prompt for a second date entry after the signature. The USCG draft ORB does not show this requirement in their examples, while the MEPC circ. does.

Other stamps like transfers, incinerator, etc will have a similar appearance.

The design for the weekly tank volumes; code C 11 is proposed as follows:

11-OCT-2010	C		Capacity	Ret.
		11.1/11.2 ST #6	40 m ³	m ³
		11.1/11.2 ST #12	25 m ³	m ³
		11.3 Total Retained on Board		m ³
		Signed: _____	Rank: _____	

Note: the dark outline indicates the stamp border.

This particular stamp will be ship class (IOPP) specific. In this example only official tank abbreviations are used, but the stamp could also facilitate entry of the full IOPP tank name. Strictly speaking only entry of Sludge tanks is required. An argument could be made for also entering weekly volumes for bilge tanks.

Also note that this stamp design does not prompt for a second date entry after the signature. The USCG draft ORB does not show this requirement in their examples, while the MEPC circ. does.

Also note that code 11.3 is listed as total retention for all tanks in the USCG ORB draft instructions, but appears to relate to the total volume retained in each tank in MEPC. 1/Circ. 736.