# INTERTANKO Guidance and Compliance Plan for the EPA Vessel General Permit Requirements



## 1. General

On 18 December 2008 the U.S. Environmental Protection Agency (EPA) issued the final Vessel General Permit (VGP) under the authority of the Clean Water Act (CWA) requirements for the National Pollutant Discharge Elimination System (NPDES) programme. The requirements will apply to 26 different discharges incidental to the normal operation of all commercial vessels 79 feet or greater in length when operating within the 3 mile territorial sea of the United States commencing on 6 February 2009.

The purpose of this document is to provide INTERTANKO members with guidance for compliance with the VGP requirements. This guidance has not been reviewed or approved by the U.S. EPA. It is the responsibility of each member to review the VGP and ensure that all of the requirements applicable to its vessels have been implemented. It is not the intent of INTERTANKO to duplicate all the VGP requirements in this document. However, a copy of the full test of the final VGP should be kept on board.

The final VGP can be seen at http://www.epa.gov/npdes/pubs/vessel_vgp_permit.pdf

In summary, the VGP contains six sections and a number of Appendices as follows:

- Section 1 contains the general requirements and identifies 26 different vessel discharges that are "eligible for coverage".

- Section 2 contains the effluent limits and related requirements for each of the 26 vessel discharges. Many of the requirements are based upon "Best Management Practices". The exceptions to this pertain to bilge water discharges, ballast water discharges, antifouling hull coatings, grey water discharges and underwater husbandry. In the latter, a combination of new requirements and existing international and national requirements apply. In addition to these 26 discharges, Section 2 also contains requirements for material storage, toxic and hazardous materials, fuel oil spills/overflows and discharges of oil.

- Section 3 contains the corrective action that must be taken if problems are identified.

- Section 4 contains the inspections, monitoring, reporting and recordkeeping requirements, which are quite onerous.

- Section 5 contains vessel class-specific requirements with section 5.5 focusing on oil tankers and petroleum tankers. Section 5.5 contains additional requirements for the inert gas scrubber, deck seals, scuppers, supplemental inspections and crew training.

- Section 6 contains the specific requirements for individual States and Indian Tribes.

- The Appendices contain definitions, EPA regional contacts, areas covered, procedures for filing a Notice of Intent or a Notice of Termination and requirements for federally protected waters.

**2. Compliance Dates**

The VGP is effective on 6 February 2009. However, under Section 1.1, the requirements for inspections, training, record keeping, and reporting are required to be met by 19 February 2009.

**3. Notice of Intent**

The owner or operator of a vessel 300 gross tons or more is required to submit a Notice of Intent (NOI) for each vessel to be covered by the permit. The NOI form can be found in Appendix E of the VGP. The NOI is required to be submitted at the earliest by 19 June 2009, but no later than 19 September 2009. Until 19 September 2009 all vessels will be automatically covered by the permit and are authorised to discharge in accordance with the permit requirements. New vessels that are delivered after 19 September 2009 will receive permit coverage 30 days after the EPA receives the complete NOI. The EPA is developing an e-NOI so that owners or operators can submit the NOI electronically. The e-NOI is expected to be operational on about 19 June 2009. INTERTANKO will notify members when it becomes operational.

For further details of the NOI submission deadlines and corresponding discharge authorisation dates, see Table 1 in Section 1.1.5.1 on page 7 of the VGP

**4. Inspections**

Section 4 of the VGP contains the inspection requirements. The EPA has advised INTERTANKO that vessels are not required to conduct inspections when they are not in waters subject to the Permit (within the 3 nm territorial sea of the U.S.). Vessels must be in compliance upon re-entering the waters of the United States. However, this means a vessel must have conducted a routine inspection within the last week or during the voyage, whichever is more frequent, and have had a comprehensive annual inspection within the last year, prior to entering US waters.

Once an NOI has been filed and the vessel has become compliant with EPA requirements, we recommend vessels continue to follow those policies and practices necessary to comply with all aspects of the VGP including Ballast Water Management, Routine Inspections, Annual Inspections, Corrective Action Assessments and Annual Reports even if the vessel is not

navigating/plying US waters. This should avoid any confusion by the ship's crew as to when the inspections should be conducted, and will be particularly relevant should the company choose to integrate the VGP inspection requirements with the company's current management and operational procedures.

Further guidance on regular inspections is given in section 5.2 as well as in Annexes II and III of this guide.

## 5. Guidance on the Requirements

On reviewing the VGP requirements in detail, members will note that many of the requirements will already be implemented within the company's various management systems and operating procedures. In particular these may include the Planned Maintenance Schedule (PMS), Safety Management System (SMS) and Environmental Management System (EMS). However, there are two reasons as to why an operator should carefully consider the implementation of the VGP requirements:

1. There are a number of new requirements within the VGP that are not already covered by current international or Federal tanker rules, or included in the more familiar tanker operators safety, quality and environmental management systems and procedures.

2. Demonstrating compliance with the VGP requirements will mean officers and crew have a detailed knowledge, understanding and immediate access to all relevant tanker rules and requirements as well as company management procedures.

A review should be taken of all 26 requirements to determine which of them are already covered within the company's management systems and operation procedures. It will be useful for those undertaking this review to be familiar with the likes of the Safety Management System, the Ballast Water Management Plans, the Planned Maintenance Schedule, the environmental management system (e.g. ISO14001 if implemented), dry-docking procedures and technical inspection checklists.

### 5.1 Company Compliance Map

In relation to the cross-over with standard tanker operator rules, requirements and best practices, the development of a map for compliance may be considered by the company. A tabulated example of a compliance map is provided in **Annex I**.

When developing the compliance map, the company should also consider the likelihood that the company has already implemented extensive inspection, tests and maintenance procedures for:

- Steel structure and coating performance
- Deck machinery, mooring equipment and deck fittings
- Cargo operation equipment
- Engine room machinery and equipment
- Pollution prevention systems and equipment
- Cargo gear and lifting equipment
- Navigation and Communication equipment
- Safety and Fire-fighting equipment

Where applicable, reference should be made to the above inspections, tests and procedures.

A company circular advising all ship and shore teams of the VGP requirements along with subsequent references to and changes to the company management procedures should be issued.

Note that equipment-based procedures which can be identified in the inspection records may also be linked with the specific equipment maintenance record and can be taken into account in the Compliance Plan, if necessary.

### 5.2 Regular Inspection and Sampling Records

A substantive part of the VGP requirements relate to inspections and sampling, as follows:

- Routine Visual Inspections: As per section 4.1.1 of the VGP requirements. For ease of implementation these have been referred to as Weekly Inspections;

- Comprehensive Annual Inspections: as per section 4.1.3 of the VGP requirements. This is referred to as Annual Inspections;

- Dry-dock Inspections: As per section 4.1.4 of the VGP requirements and included in this guide as Dry-dock Inspection Record and Certificate, **Annex VI**, and;

- Quarterly Sampling. In addition to visual inspections, section 4.1.1 of the VGP requires sampling to be undertaken of discharge streams which are not readily visually inspected such as effluent streams discharged below the waterline. **Annex IV** of this guide provides a model recording form for sampling. It should be noted that the requirements stipulate that samples shall be taken at least once per quarter.

Both types of inspections require a log or record of the findings as well as any corrective actions. INTERTANKO has provided sample model record sheets for Weekly and Annual Inspections - see **Annexes II** and **III** of this Guide. It is however noted that many companies may wish to include such inspection records into an electronic record or tracking system.

On reviewing Annexes II and III, it should be noted that the model forms take into account the full requirements as provided for in section 2 of the VGP. Elements of the requirements are included in the record sheets to assist the ship's staff in understanding the objective and reasoning behind the item under inspection.

The use of the forms, however, does not preclude the requirement of the ship’s watch to visually monitor the water around and behind the vessel for visible sheens, dust, chemicals, abnormal discoloration or foaming, and other indicators of pollutants or constituents of concern originating from the vessel. If a crew member identifies or becomes aware that pollutants or constituents of concern are originating from the vessel, corrective actions must be initiated.

### 5.3 Additional Specific Requirements for Oil Tankers

Section 5.5 of the VGP contains additional specific requirements for oil tankers that pertain to discharges from inert gas scrubbers, deck seals and scuppers. This section also contains supplemental inspection and training requirements..

- Supplemental Inspection Requirements for Oil Tankers.
  A visual sheen test must be conducted after cargo loading operations, cargo unloading operations, and deck washing. However, it is advisable to undertake the inspections before, during and after cargo operations, i.e. on a continuous basis. The visual sheen test is used to detect free oil by observing the surface of the receiving water for the presence of an oily sheen. A record of the time frame for when the inspections were undertaken, the results and of who undertook the visual sheen test should be maintained. This may be kept in the Weekly Inspection Record for easy access and record keeping.

  Under 40 CFR 110 or 40 CFR 302, if a visible sheen is detected, the discharge must be reported immediately to the National Response Centre according to procedures described in the vessel’s VRP. Furthermore, appropriate corrective actions must be taken and must be

recorded accordingly in the Bridge Log Book. Note that some operators may also record this data electronically, which may also allow for easier retrieval of the data as and when required.

- Training requirements

  Implementation of the VGP will require the establishment of a training plan to ensure the company's personnel are familiar with, and fully understand, the VGP requirements and their integration into the company's management procedures. This is part of the additional requirements for the tanker crew which extend to proficiency in the arrangement of environmental procedures and relevant discharge types. Please refer to section 5.5.4 of the VGP and note that records should be maintained to demonstrate that staff have undertaken appropriate training.

### 5.4 Corrective Action

In the three model inspection and sampling forms provided in the Annexes an option is given to provide details of any non-compliance. However, such details should make reference to the relevant Corrective Action Assessment. A model format for a Corrective Action Assessment is provided in **Annex V**.

Alternatively it may be appropriate to incorporate the non-compliance and corrective action into more standardised procedures shipboard safety, quality and environmental management systems, e.g. the SMS or, if applicable, an environmental and/or quality management system such as ISO14001/2004 or ISO9001/2000 respectively. In such cases reference of the non-compliance must be included in the inspection and sampling records.

It is also important to note that all non-compliance must be reported to the relevant regional office of the EPA at least once a year. The relevant regional office will be determined by either the waters in which the non-compliance was recorded or by the region in which the vessel most frequently trades. See Section 8 of the VGP for a list of the regional EPA offices.

Finally, any non-compliance which is deemed to endanger human health or the environment should be reported orally to the appropriate EPA regional office within 24 hours and in writing within 5 days.

### 5.5 Dry-dock Inspection Certification Report

**Annex VI** provides a model Dry-dock Inspection Certification Report. Note that this document provides only the details as relevant to the VGP requirements and that operators will already have in place extensive dry-docking inspection procedures.

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# Annex I - Model Compliance Map

Following provides an example of a format for cross referencing standard company management procedures with the VGP requirements:

| Item * | Management Procedure ** | Records/Documentation |
|---|---|---|
| ***Technology-based Effluent Limits and Related Requirements for Specific Discharge Categories*** | | |
| **2.2.1 Deck washdown and runoff and above waterline hull cleaning** | **PMS:** Drip trays should be drained, wiped and cleaned. Procedure for the minimisation of droplets when conducting maintenance painting.<br>**SMS:** No deckwash within 3 nm of US shore; visual sheen test. | *Insert specific reference to appropriate company document or record* |
| **2.2.2 Bilge water** | **SMS:** Do not discharge bilge water in 3 nm zone. | " |
| **2.2.3 Discharges of Ballast Water** | **Ships' BWMP:** National Requirements, USA – section has been updated. | " |
| **2.2.4 Anti-fouling hull coatings** | **SMS:** Routines for diving inspections. | " |
| **2.2.5 Aqueous Film Forming Foam** | **SMS:** Do not use foam during training within 1 nm of US shore. | " |
| **2.2.8 Chain Locker Effluent** | **SMS:** Procedure for cleaning anchor chain<br>**Dry-dock Procedure**: Cleaning chain lockers<br>**PMS:** Chain box to be cleaned yearly. | " |
| **2.2.15 Grey water** | **SMS:** Minimise grey water production and discharge within 1 nm of shore. Always order and only utilise phosphate-free detergents.<br>**SMS and Galley Routine Manual:** Do not discharge oil from cooking into grey water. | " |
| **2.2.20 Seawater Piping Biofouling Prevention** | **Dry-dock Procedure**: Routine for removing seawater piping biofouling.<br>**SMS:** Minimise chemical usage within 3 nm of the shore. | " |
| **2.2.21 Small Boat Engine Wet Exhaust** | Use low sulphur fuel or alternative fuels for small-boat engines. | " |

* Item number corresponds to relevant section of the VGP requirements

** Insert relevant company management procedure either current or updated – the text in the table is for example only

**SMS**: Safety Management System
**PMS**: Planned Maintenance Schedule
**BWMP**: Ballast Water Management Plan

Such a table should be drawn up following a full review of the VGP requirements. Drawing together the key management team responsible for marine operations, safety, quality and technical management procedures will likely be necessary to undertake this task.

# Annex II – Model Weekly Inspection Record

**VESSEL:** **DATE: …../…./……..**

| | Inspection items | Applicable | Responsible officer Signature |
|---|---|---|---|
| Deck Area<br>*(note that any deck wash down should be conducted prior to entry into US waters)* | Confirm that the decks are kept clear of any debris, garbage, and oil/chemical spills (e.g. grease, fuel, hydraulic fluid, caustics, detergents) to prevent these wastes from contaminating discharges. | Y / N | C/O |
| | Confirm that the deck area is properly maintained, in a manner consistent with good marine practice, to prevent excess discharge of metals and oils from eroding metals and deteriorating pipes, coamings, and other topside infrastructure. | Y / N | C/O |
| Paints/solvents in the Paint locker | Confirm that:<br>- Materials/stores are properly stored/stowed;<br>- The area is free of any leaks/spills;<br>- Toxic and hazardous materials are kept in appropriate sealed containers constructed of a suitable material, labelled, and secured; and<br>- MSDS are available for the hazardous material. | Y / N | C/O |
| Chemicals in the Chemical locker | | Y / N | C/E |
| Lube oils/Greases in the Engine/Steering Gear Room | | Y / N | C/E |
| Cargo/bunker samples in the Paint Locker or in the anti pollution store/sample locker | | Y / N | C/O / C/O |
| Oil dispersants in the Deck Store | | Y / N | C/O |
| Detergents in the Cabin Stores Locker | | Y / N | C/O |
| Refrigerant gases in the Engine Room | | Y / N | C/E |
| Oxygen/acetylene gases in the Oxygen/Acetylene rooms | | Y / N | C/E |
| Any other stores/materials stored in the deck area | Confirm that the materials/stores are properly stowed/lashed in an area as much as possible protected from wind, rain, or spray. | Y / N | C/O |
| Garbage storage area | Confirm that the garbage storage is located aft and that the stored garbage are properly stored and | Y / N | C/O |

| | Inspection items | Applicable | Responsible officer Signature |
|---|---|---|---|
| | protected as much as possible from wind, rain, or spray. | | |
| Spill containment arrangements around bunker and cargo manifolds, service and storage oil tank vents and hydraulic machinery | Check that no leak exists. | Y / N | C/O |
| Scuppers plugging during cargo operation/bunkering | Check that the general condition of the scupper plugs is satisfactory and no obvious damage exists in the sealing rubbers. Lube oil replenishment. | Y / N | C/O |
| Fixed dump valves | Inspect condition and ensure proper operation when vessel is in ballast condition. | Y / N | C/O |
| Oil water separator | Confirm that the OWS and the 15 ppm alarm are inspected on a weekly basis and appropriate records are kept in accordance with the vessel's PMS. | Y / N | C/E |
| Engine Room/Steering Gear Room inspection/Refrigeration plant | Confirm that daily records are kept in the Engine Log Book as regards the implementation of the Daily Inspection described in Engine Standing Orders. | Y / N | C/E |
| Ballast Water Management records | Confirm that the Ballast Water Management records are properly kept as per Ballast Water Management Plan (and relevant training records). | Y / N | C/O |
| Cathodic protection - ICCP | Check that proper records of the ICCP system inspections are logged in the relevant report form according to the SMS and/or PMS. | Y / N | C/E |
| Chain locker sump | Confirm that the chain locker sump has been pumped out overboard, *on a regular basis as established by the company*, in open waters (greater than 50 nm from shore) and recorded in the Bridge Log Book or equivalent electronic log. Indicate date of last discharge. | Y / N | C/O |
| | Confirm that the chain locker sump has been pumped out overboard prior to entering the "*waters of the United State*s". Date:…… | Y / N | C/O |
| Fire main system<br>*(note that discharge of foam is prohibited within 3nm of the US coast)* | Confirm that the fire/foam hydrants as well as the foam guns are inspected on a regular basis *(as established by the company)* and that proper records are kept in the relevant section of the SMS, e.g. "Record of Safety Equipment Inspections and maintenance".<br>Indicate date of last inspection:…… | Y / N | C/O |
| Graywater<br>*(note VGP requires minimization of grey water production while within 3nm of the US coast)* | Check that there is available a stock of non-toxic, phosphate-free and biodegradable soaps and detergents to be used while the vessel is within the "*waters of the United States*". | Y / N | C/O |
| | Confirm that oils used in cooking are not discharged in the grey water piping/system but instead are collected and temporarily stored onboard. | Y / N | C/O |
| Seawater Piping Biofouling Prevention | Check that biofouling management inspections are logged in the relevant recording form including maintenance and cleaning of heat exchangers as per manufacturers' requirements. | Y / N | C/E |
| Stern tube sealing arrangement | Check the oil level of the FWD and AFT seal L.O. tanks to confirm that there is no oil leakage/water ingress. | Y / N | C/E |

| | Inspection items | Applicable | Responsible officer Signature |
|---|---|---|---|
| | | | |
| Inert gas scrubber | Ensure that the unit is inspected regularly *(as per company requirements)* and record the date of last inspection<br>Date of last inspection: …… | Y / N | C/E |
| Deck Water Seal | Ensure that the unit is inspected quarterly and record the date of last inspection<br>…… | Y / N | C/E |
| Visual monitoring of the water around and behind the vessel | Check for visible sheens, dust, chemicals, abnormal discoloration or foaming, and other indicators of pollutants or constituents of concern originating from the vessel. | Y / N | C/Officer / C/E |

**Following the above inspections it is confirmed that the vessel complies with the requirements of the VGP manual** **YES** ☐ **NO** ☐

**List and describe any identified case of non-compliance:**

**List and describe any identified potential problem:**

Master: Name: Signature:

Chief Officer: Name: Signature:

Chief Engineer: Name: Signature:

*This document must be kept on board the vessel for a period not less than three years after the inspection date.*

# Annex III - Model Annual Inspection Record

**VESSEL:** **DATE: …../…./……..**

| | Inspection items | Remarks | Responsible officer Signature |
|---|---|---|---|
| Seawater Piping Biofouling Prevention | Check that the sea chests and strainer plates have been inspected/cleaned, as necessary. | Date last inspected: …… | C/E |
| Stern tube sealing arrangement | Check that the stern tube sealing arrangement is leak free. | Refer to the last inspection dated: ……. | C/E |
| Hull fouling/underwater ship husbandry discharges | Check the degree of hull fouling. Inspect the visual parts of the hull when the vessel is in ballast condition and refer also to the last underwater inspection. | Refer to the last underwater inspection dated: ……. | Master |
| Inert gas scrubber | As per the PMS | Refer to the last inspection dated: ……. | C/E |
| | Check that the inspection/overhauling records are properly kept as per the PMS . | Date last inspected: …… | C/E |
| Deck Water Seal | Check that the inspection/overhauling records are properly kept as per the PMS | Date last inspected: …… | C/E |
| Oily Water Separator, bilges and pumps | Check that the OWS as well as bilges and pumps are maintained and cleaned. | Date last inspected:…….. | C/E |

** Note that some items above may not require 'annual' inspection but may overlap with Planned Maintenance Schedule (PMS).*

**Following the above inspections it is confirmed that the vessel complies with the requirements of the VGP manual** **YES** ☐ **NO** ☐

**List and describe any identified case of non-compliance:**

**List and describe any identified potential problem:**

Master: Name: Signature:

Chief Engineer: Name: Signature:

*This document must be kept on board the vessel for a period not less than three years after the inspection date.*

# Annex IV – Model Sampling Record

**VESSEL:** **DATE: …../…./……..**

| | Inspection items | Time of Sampling | Results / Comments | Responsible officer Signature |
|---|---|---|---|---|
| Oil/Water Separator discharge | Confirm that the sample does not contain any signs of oil sheen or any other visible pollutants or constituents of concern, including discoloration, suspended solids, floating solids, foam, or changes to clarity. | | | C/E |
| Deck Seal Water | Confirm that the sample is clear with no signs of oil. | | | C/O |
| Gray Water | Sample is clear of visible pollutants including excessive discoloration, visible sheens, suspended solids, floating solids, foam or changes to clarity. Note this may be achieved by visual inspection if overboard discharge is above the waterline. | | | C/E |

Note that as per section 4.1.1 of the VGP, samples should be taken at least once per quarter.

**Results**

Complete A or B as follows: **A** Clear with no contaminants
**B** Visible signs of contaminants – in the case of B, reference should be made to the relevant non-compliance report.

Master: Name: Signature:

Chief Officer: Name: Signature:

Chief Engineer: Name: Signature:

*This document must be kept on board the vessel for a period not less than three years after the inspection date.*

# Annex V – Model Corrective Action Assessment

**VESSEL:** **DATE: …../…./……..**

Reference to incident or inspection/sampling form in which non-compliance identified:_____

Description of the corrective actions to be taken to eliminate the problem:

_____

_____

_____

Schedule of activities for completing corrective actions in accordance with timeframes established in VPG Manual:

_____

_____

_____

Does the corrective action require the vessel to be in dry dock (circle one)?: Yes / No

If so, the next planned date the vessel will be dry docked is:_____

Corrective action implemented

Date:_____

Time:_____

Description of corrective action taken:

_____

_____

_____

Recorded by Name:_____

Rank:_____

Signature:

# Schedule for Corrective Action

*(as per section 3.3 of the VGP)*

| Type of corrective action | Deadline |
|---|---|
| Corrective actions that can be accomplished with relatively simple adjustments to the control measures, using existing personnel and resources, and not requiring the vessel to be in dry dock (example: altering practices for material or equipment storage that caused contamination during a precipitation or high wave event). | As soon as possible but no later than 2 weeks after the discovery of the problem |
| Corrective actions that require new parts or the installation of new equipment, not requiring the vessel to be in dry dock (examples: fixing leaking pipe connections or seals that allow oil or other contaminants to reach discharges; installation of drip pans to prevent equipment spills or machinery area runoff from reaching deck washdown effluent). | Address the underlying cause of the noncompliance and return to compliance and/or complete necessary repairs no later than 3 months after the discovery of the problem. However, if completing repairs within 3 months is impracticable, repairs must be completed as soon as possible after 3 months and the reason why more time is needed must be documented as part of the corrective action assessment.<br><br>The appropriate EPA regional office must be notified of why the additional time is needed and of the date when the correction is anticipated to be completed.<br><br>It should be noted that during the period immediately following the initial violation and before the corrective action has been completed, every effort must be made to reduce potential environmental harm. |
| Corrective actions that require large or comprehensive renovations, alterations, or repairs to the vessel that can only be achieved while the vessel is in dry dock (examples: replumbing waste lines, rerouting drains, or installation of additional holding capacity for select discharge types). | Address the underlying cause of the noncompliance and return to compliance and/or complete necessary renovations or repairs prior to re-launching the vessel from dry dock.<br><br>It should be noted that if the vessel is in dry dock after incurring a violation and corrective action is not taken to alleviate the identified problem, then the vessel will be in violation of the corrective actions section of the VGP for every occurrence or discharge after re-launching the vessel (in addition to any original violations prior to going into drydock). |

# Annex VI - Model Dry-dock Inspection Certification Report

**VESSEL:** **DATE: …../…./……..**

| Item | Date | Name & Signature |
|---|---|---|
| The chain locker has been cleaned of accumulated sediments and any potential accompanying pollutants and living organisms as part of scheduled drydock maintenance. | | |
| The vessel hull has been inspected, cleaned from any attached living organisms, rust and scale and new antifouling coating applied. | | |
| Antifouling hull coatings which have been applied and are in compliance with the IMO AFS Convention requirements. Paint manufacturers also confirmed the antifouling coatings are consistent with FIFRA requirements and do not contain biocides or toxics that are banned for use in the United States. | | |
| The components of the ICCP system, reference cells, anodes, and dielectric shields are inspected and maintained as appropriate. | | |
| The sacrificial anodes are inspected, cleaned and replaced, as necessary, with the aim of reducing excessive flaking or releases from the oxidizing anodes. | | |
| The OWS has been inspected and properly functioning. | | |
| The ODM has been thoroughly inspected and properly functioning. | | |
| The protective seal on the rudder bearing has been inspected and changed (if required). | | |
| The protective seals in way of the controllable pitch propeller blades (if installed) have been inspected and changed (if required). | | |
| The stern tube seals have been inspected and changed (if required). | | |

Master: Name: Signature:

Chief Officer: Name: Signature:

Chief Engineer: Name: Signature: