

## U.S. Coast Guard Gives Notice of Vulnerability of Oil Content Meters

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The U.S. Coast Guard Office of Investigations and Analysis has issued a Technical Advisory concerning the vulnerability of certain Oil Content Monitors (OCMs) to actions that could defeat the OCMs' ability to effectively monitor discharges from an Oily Water Separator (OWS). What is most notable about the Advisory is that it gives clear notice that the Coast Guard is well-aware of the many devices that persons may use to "trick" OCMs to allow the overboard discharge of bilge water with oil content in excess of the permitted 15 parts per million. As maritime professionals know well, prosecutors have been obtaining convictions of companies and engineers for false oil record books and other offenses based upon the "tricking" of OCMs through such devices, including the 2006 conviction of OSG. The Technical Advisory is intended to put ship operators and owners on notice to be alert for sophisticated modifications to OWS and OCM equipment; because the Coast Guard and other enforcement authorities will be looking for such modifications themselves, and the consequences of such "tricks" could be severe.

**Please see the attached document for the U.S. Coast Guard Technical Advisory on Oil Content Meters**

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