

# Inspector Bulletin

Latest updates & News feeds for Inspectors. 06th Dec 2019

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**VIQ 5.39** Are officers aware of the requirements for testing fixed fire detection and alarm systems and are the systems in good order and tested regularly?

*Spaces not covered by a fire detection system should be covered by regular fire patrols.*



**Inspector Observation:** There was no fire detection sensor in the Navigation Bridge which was a control station, therefore bridge was not protected by fire detection during cargo operations when bridge was unmanned. The nearest sensor was located outside the bridge behind the internal bridge entrance fire door.

Initial Operator Comments: Ship was constructed on 2011 (vessel's keel laid on 09 Sept 2011) and delivered to her owners on 17th Feb 2012 being fully compliant with applicable rules & regulations at the time of construction. However, following the observation we are in contact with Classification Society in order to ascertain if further actions are required.

**SOLAS Reg II/2 Reg 7 5.5 Cargo ships** (Unless expressly provided otherwise, the requirements of this chapter shall apply to ships constructed on or after 1 July 2012)

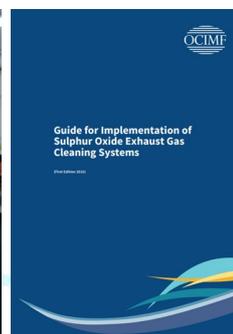
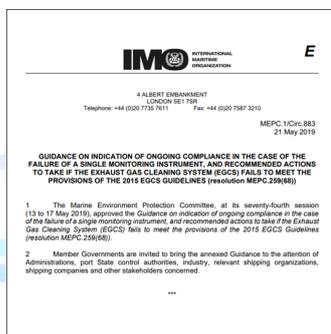
Accommodation and service spaces and control stations of cargo ships shall be protected by a fixed fire detection and fire alarm system and/or an automatic sprinkler, fire detection and fire alarm system as follows, depending on a protection method adopted in accordance with regulation 9.2.3.1.

In this case here there is no requirement for the fitting of sensors, however the VIQ guidance does require regular fire rounds during periods of the bridge being unmanned. In this case, inspectors should verify that a regular fire round covers the bridge during these unmanned periods. This also applies to other areas that are not protected with fixed fire detection equipment.

**Inspector Observation:** The vessel was not provided with the correct equipment for testing of the flame and heat detectors onboard. A non-approved heat gun was reported to have been used for such testing rather than the correct flame and heat testers as recommended by the makers instruction booklet.



## Exhaust Gas Cleaning System Failures



## Effect of Failure of EGCS

With the 2020 sulphur cap deadline approaching and the numerous installations of exhaust gas cleaning systems on vessels the IMO have introduced guidance on actions in the event of failure of such systems.



This Guidance letter <https://www.mardep.gov.hk/en/msnote/pdf/msin1917anx3.pdf> specifies that a short-term temporary emission exceedance due to the system failure should not be considered as a breach, and the system malfunction that cannot be rectified within one hour is regarded as a breakdown and should be reported to flag States and port State's Administration. The Guidance also specifies the procedures to show the ongoing compliance, in case of the failure of a single monitoring instrument, with other parameters continuing at the normal levels. (Refer to MEPC.1/Circ.883 as attachment 14).

This is just to inform inspectors in advance what actions operators will be expected to follow.

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## Interesting Observation Shared

**VIQ 8.46 Is the pump room gas monitoring system in good order, regularly checked and are officers aware of the alarm settings?**

*Sampling points or detector heads shall be located in suitable positions in order that potentially dangerous leakages are readily detected.*



**Inspectors Observation;**  
The Consilium fixed Gas Sensor Cabinet fitted in the CCR had lost its gas containment function for an eventual system gas leak, as 2 approx. 8 cm Diam. Holes had been perforated on the side, reportedly for better pump ventilation/cooling.

## MSC.1/Circ.1370 GUIDELINES FOR THE DESIGN, CONSTRUCTION AND TESTING OF FIXED HYDROCARBON GAS DETECTION SYSTEMS

2.1.7 " The system should be designed, constructed and installed to prevent the leakage of hydrocarbon gases into any accommodation and service spaces, control stations or machinery spaces."

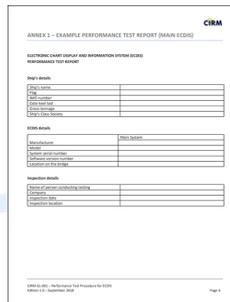
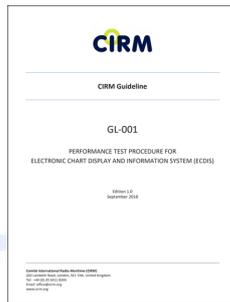
3.2.3 " The gas concentration inside the control panel enclosure should be monitored. Upon detection of gas concentrations above the alarm setpoint within the enclosure, in addition to the alarm, the gas analysis unit should be automatically isolated from all sampling pipes and shut down. Appropriate measures should be taken to vent flammable gas inside the enclosure to an open space away from ignition sources."

Basis the above guidance the inspector has rightly identified a compromise of the cabinet integrity which may have an impact on the gas detection capability of the sensor detecting a leak within the space. Refers to enclosure and as you say this is now breached with a larger hole hence integrity is compromised and system no longer approved or an "enclosure"

## ECDIS Annual Inspection Test

Following on from the Concentrated Inspection Campaign (CIC) on Safety of Navigation including ECDIS jointly with the Tokyo MOU between 1 September 2017 and 30 November 2017 it was noted in **3.8%** of the inspections, Q2 of the questionnaire "Does the ECDIS have the appropriate up-to-date electronic charts for the intended voyage and is there a suitable back-up arrangement?" raised a deficiency.

As a result of the CIC and in response to concerns raised by stakeholders across the maritime industry about the condition of in-service ECDIS, frequently found to have operational issues. Problems typically encountered included inadequate power supply arrangements, outdated software versions, disabled audio signal for alerts, and the incorrect functioning of interfaces to connected equipment. The purpose of the Guideline is to ensure that an in-service ECDIS is functioning properly, in the interests of safety of navigation and of course to meet ISM and SOLAS requirements.



Though the test is NOT mandatory it is recommended and inspectors should verify that there is a process in place for verifying the performance of the equipment annually. Makers maintenance instructions for ECDIS should also be included within the vessels planned maintenance program.

## Ballast Tanks and Flame Screens - Clarification

**VIQ 11.7 Are fuel, ballast and other space vents and air pipes in good order and does visual evidence indicate regular maintenance?**

*NOTE There is no requirement for ballast tank vents to be fitted with flame screens.*

Class have no requirement for installing flame screens on ballast tanks though if there are screens fitted then they should of course be in good order.

**46 CFR 56.50-85** states "Vent outlets from all tanks which may emit flammable or combustible vapors must be fitted with either :

- 1) A single screen of corrosion resistant wire of at least 30 by 30 mesh; or
- 2) Two screens of corrosion resistant wire of at least 20 by 20 mesh spaced not less than 1/2 inch nor more than 1 1/2 inches apart. The clear area through the mesh must not be less than the internal unobstructed area of the required pipe."

Hence again no requirement for fitting flame screens in ballast tanks.

