

Inspector Bulletin

Latest updates & News feeds for Inspectors. 2nd June 2020

○ Experience Transfer

○ Advice and Guidance

○ Regulation Updates

VIQ 5.17 Are the crew aware of safe entry procedures into the pump room, compressor rooms and trunk spaces as applicable and are safe entry procedures being followed?

Inspector Observations: The cargo pump room was not provided with a fixed communication system. The only means of communication was by portable radio.



ISGOTT 10.10.2 Pumproom Entry Procedures

A communications system should provide links between the pumproom, navigation bridge, engine room and cargo control room.

Arrangements should be established to enable effective communication to be maintained at all times between personnel within the pumproom and those outside. Regular communication checks should be made at pre-agreed intervals and failure to respond should be cause to raise the alarm.

VHF/UHF communication should not be used as a primary communication method where it is known that reception may not be reliable or practicable due to noise. Where communication by VHF/UHF is difficult, it is recommended that a standby person is positioned on the pumproom top and that a visual and remote communication procedure is put in place.

OCIMF An Information Paper on Pumproom Safety

Arrangements should be established to enable effective communication to be maintained at all times between personnel within the pumproom and those outside. Regular communication checks should be made at pre-agreed intervals and failure to respond should be cause to raise the alarm.

A communications system should provide links between the pumproom and the navigation bridge, engine room and cargo control room. In addition, audible and visual repeaters for essential alarm systems, such as the general alarm, should be provided within the pumproom.

Hence it should be noted that there is NO requirement for cargo pumprooms to be fitted with a fixed communication system such as telephone booth. However there **MUST** be an effective means of communication established that **MAY** be through the use of portable UHF radios. The vessels operator should have established the method of communication that includes the use of headsets as maybe determined by the noise level. Further, there should be no significant areas in the pumproom that may have signal issues for the communication system in use.

VIQ 5.32 Are lifejackets in good order and correctly located?

Inspector Observations: The lifejackets on board were not in accordance with MSC.207(81) as they required tying of knots.

Initial Operator Comments: Not applicable for the vessel as the date on which keel was laid is 04 February 2008 and the delivery date as recorded in Form A or Form B Q1.8.3 of the IOPPC is 06 September 2008.

The MSC.207(81) requirements applies to lifejackets provided on board ships constructed (having their keel laid) **on or after July 1, 2010** and when providing new lifejackets to vessels with a keel laying date before July 1, 2010. However, if it becomes necessary to supply new lifejackets, this will be done strictly in accordance with existing requirements. Also, as a preventive action – a campaign of checking lifejackets compliance across the Fleet was initiated in the Company.

It's important for inspectors to ensure that when they raise observations on existing vessels that the legislation is also applicable here or not. Where there is doubt the inspector should check at the end of the inspection with reference material such as Seamanship / Regs4Ships or onboard publications before raising the observation and you always have our support in the office to try to help clarify with anything.



VIQ 5.29 Are lifeboats, including their equipment and launching mechanisms, in good order and have they been launched and manoeuvred in the water in accordance with SOLAS requirements?

Inspector Observation: The call sign identification marking on top of the enclosed lifeboat appeared too small to be viewed from the air. Each letter size on the call sign was 65mm width x 100mm height.

The observation references to the extreme height and width of the letters here.



Reference LSA code 4.4.9.3 states *Means of identifying the ship to which the lifeboat belongs and the number of the lifeboat shall be marked in such a way that they are visible from above.*

DNV-GL Rules for Classification and Construction Guidelines for Lifeboats and Rescue Boats Section 5 Hull Outfit 1.3 states *"The identification of the ship shall consist of the signal letters or the IMO number of the ship. Letters and number shall be painted or pasted on the top of the cover, if available, with a **height of not less than 500 mm and not less than 50 mm width***, where possible."* *Note the width is the actual thickness of the letter itself rather than how wide the letter itself is.

"Other markings on the lifeboat shall be so arranged to avoid visual mixing with the markings defined above".

“ Our company goals are simply stated with the target towards No accidents, No incidents and No negative feedback from our customers and Employees ”

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VIQ 8.20 If stop valves are fitted which permit isolation of individual tanks from the common venting system, are they provided with positive locking arrangements and are the keys under the control of the person in overall charge of the cargo transfer?

Where stop valves are fitted, they shall be provided with locking arrangements which shall be under the control of the responsible ship's officer. There shall be a clear visual indication of the operational status of the valves or other acceptable means.

Here is a good example of well managed inert gas tank valve arrangements



Here we have the padlocks protected so that they can be opened easily and a clear statement in the CCR as to the level of authority for the control of these valves.

Quick Note:

Thank you for taking your time to read our Inspector Bulletin. If you have anything of interest that you would like to share with us or you wish to add anything to the next edition, please Email Jordan@awpmarine.com

Click the link Below to see all the latest news from AWP Marine

<https://awpmarine.com/Latest-News>

****Safety Alert****

Carbon Monoxide detected inside Ballast Water Treatment plant room

VIQ 6.21 If the vessel is provided with an approved Ballast Water Treatment System, is the system in good order, used where required and are officer's familiar with the safe operation of the same?

Inspector Observations: At the time of entering the BWTS room for visual inspection, high level (maximum 110 ppm) of Carbon Monoxide was detected by portable gas detectors in the BWTS room. (Checked again through the ventilator of BWTS and detected same high level of carbon monoxide.) (The BWTS of Electrolysis and Neutralization system was running when inspected and in normal working without warning alarm).

Other Inspector Comments: BWTS system Electrolysis unit and Neutralization tank were located in a compartment at 'A' deck level of engine casing structure port side.

Initial Operator Comments: The ballast water management method of vessel is designated as D -2(ballast water treatment system) in accordance with IBWMC (International Ballast Water Management Certificate).

The vessel loaded ballast water through BWTS as per above mentioned method during cargo discharging operation at Kawasaki, Japan. But, Carbon Monoxide was detected by portable gas detectors in the BWTS room at the time of entering the BWTS room for visual inspection.

As a result, the BWTS room was not inspected although BWTS was operated normally. A gas detector for the detection of hydrogen is installed, but a gas detector for the detection of carbon monoxide is not provided although this equipment is installed to meet requirement of regulation.

After departure, the vessel confirmed from maker that generally, scales are produced by sea water electrolysis as a by-product and these scales could be accumulated in the each electrolyzer modules inside as time goes by. If the scales are not removed properly and accumulated too much, electrode can be damaged by over voltage.

The vessel inspected electrolyzer module according to maker's recommendation. As an inspection result, scales were confirmed in electrolyzer module and these removed and conducted chemical cleaning of electrolyzer module.

After maintenance work, the vessel confirmed that Carbon Monoxide is not detected in BWTS room during BWTS is operating.

To prevent recurrence,

- 1) The vessel added PMS items to periodically inspect and conduct cleaning the electrolyzer module.
- 2) The vessel prepared and posted the notice letter that fan should be operated and checked the atmosphere of BWTS room.
- 3) The vessel revised BWTS operation checklist to check the contents of Carbon Monoxide for BWTS room every hour when the BWTS is operating.
- 4) This observation was distributed to all fleet vessels to add PMS items to periodically inspect and conduct cleaning the electrolyzer module.
- 5) All crew have been educated hazards of Carbon Monoxide refer to MSDS.
- 6) The company will discuss with related team to install the gas detector sensor for Carbon Monoxide because it was identified the carbon monoxide could be occurred in the BWTS room.

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VIQ 10.13 Is a Ship specific list of Critical equipment defined and available on board and highlighted in the PMS? Are there measures in place to ensure that defined critical spare parts are available on board?

The Company should establish a minimum level of critical spare parts for the vessel based on a risk assessment that should include consideration from manufacturers recommendations, class requirements and redundancy factors of machinery. There should be an effective means to ensure that the level of critical equipment can be monitored.

It is not for the inspector to determine what he/she considers to be critical equipment and with it the level of critical spare parts that should be maintained onboard a vessel. The key point of this question is to ensure that the operators have established a risk based approach to identify the critical equipment onboard that will be based on several factors including experience, age, reliability, duplication, single point failure and the effects of these failures. Once the operator determines the critical equipment onboard (that maybe further subdivided into safety, environmental and operational equipment), then they can determine a minimum level of spares so that in the event of failure they can return the vessel to a safe operational level and/or avoid premature failure of such critical equipment. OCIMF Information Paper *Safety Critical Equipment and Spare Parts Guidance* should be consulted by the operators to help follow a risk based approach to determining the levels of critical spares needed.



Safety Critical Equipment and Spare Parts Guidance

(First edition 2018)

Covid-19 Update Bulletin

Inspection guidance during the global COVID-19 pandemic

COVID-19 Ongoing Situation and Guidance

We have now begun to gain some experience in dealing first hand with the practicalities of COVID-19 preventative measures when conducting inspections and the concerns that it may have on both the inspector performing the work and the vessels staff that are required to engage with the inspector onboard. Many industry bodies have produced some excellent guidance to help facilitate inspections with minimal risk to all parties with the key message that if either party feels unsafe with the situation then they should terminate the inspection.

To refresh our inspectors with the latest OCIMF support guidance

<https://www.ocimf.org/news/news-articles/ocimf-covid-19-update-bulletin-8-inspection-guidance-during-the-global-covid-19-pandemic>

It is recommended that when organising travel and accommodation, the following points are considered:

- Travel restrictions can change rapidly during the current crisis, and an Inspector may be prevented from travelling to undertake an inspection or, prevented from travelling home upon completion of the inspection. Where the latter is a possibility, it is recommended that the Inspector engages with the Submitting Company to develop a contingency plan before travelling to the inspection.
- Distant travel should not be booked for overnight trips if suitable safe accommodation cannot be booked and confirmed in advance to ensure adequate rest for safe journey management.
- Driving long distances to and from inspections is undesirable as fuel/food/rest stops will inevitably increase exposure to COVID-19 for inspectors and the potential for passing this on to ship's staff and the inspectors' families.
- An Inspector is responsible for ensuring that they are adequately rested and fit to drive when they drive in connection with a Programme Inspection.
- Sleeping on board a vessel which is in the process of being inspected or, when an inspection has been completed, is discouraged unless it is impossible to leave the vessel.
- An Inspector should leave a vessel as soon as an inspection has been completed.