

Inspector Bulletin

Latest updates & News feeds for Inspectors.

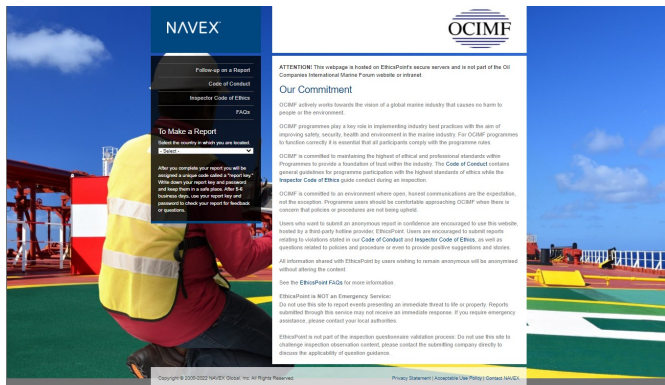
24th Feb 2022

● Experience Transfer

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EthicsPoint Anonymous Reporting Tool



I would like to bring to the attention of all our inspectors the OCIMF anonymous reporting tool that has been provided to support participant users and inspectors in maintaining the quality standards of compliance expected of the industry. This is a great initiative that can be accessed at: <http://ocimf.ethicspoint.com/>

VIQ 8.30 Was the inert gas system in use and operating satisfactorily at the time of the inspection?

Inspector Observation: The vessel was discharging a flammable and toxic cargo that had an oxygen dependent inhibitor (oxygen to be maintained never less than 5% or over 8%) that had been added prior to loading; The vessel was fitted with a nitrogen generator that was not used for the discharge.

IBC 15.13.5 When a product containing an oxygen-dependent inhibitor is to be carried:

1) in a ship for which inerting is required under SOLAS regulation II 2/4.5.5, as amended, the application of inert gas shall not take place before loading or during the voyage, but shall be applied before commencement of unloading;

2) in a ship to which SOLAS regulation II-2/4.5.5, as amended, does not apply, the product may be carried without inerting (in tanks of a size not greater than 3,000 m3). If inerting is to be applied on such a ship, then the application of inert gas shall not take place before loading or during the voyage, but shall be applied before commencement of unloading.

VIQ 5.26 Is gas welding and burning equipment in good order and spare oxygen and acetylene cylinders stored apart in a well-ventilated location outside of the accommodation and engine room?

Regulators should be inspected annually and replaced or refurbished on a 5-year basis or as per manufacturer's instructions. (British Compressed Gases Association Code of Practice CP7)



The VIQ makes no reference to the flashback arresters requiring periodic maintenance. However, the same publication (British Compressed Gases Association Code of Practice CP7) states Flame arrestors and their integral cut off valves should be replaced with a new or refurbished unit 5 years from the date of manufacturer or as per manufacturers recommendations.

SIRE 2.0 Q 10.3.7 "Was gas welding and cutting equipment in good order, and spare oxygen and acetylene cylinders stored apart in a well ventilated location outside of the accommodation and engine-room?"

Flashback arrestors and regulators:

- *Inspect and check annually. (Typically, this will be a creep test to ensure regulator integrity)*
- *5 years from date of manufacture or manufacturer's recommendations, replace with a new, or refurbished unit.*

So, the flash back arrestors should be treated the same as the gas regulators on periodic maintenance plans.

"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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Will it work when released ??



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VIQ 5.23 Does the vessel have appropriate duplicate portable gas detection equipment suitable for the cargoes carried, are the officers' familiar with the operation, calibration and is the equipment being maintained in accordance with manufacturers and industry recommendations?

Inspectors Observation: The vessel was provided with just one electronic portable gas detector capable of monitoring carbon monoxide prior to entering an enclosed space. Portable gas detector tubes for carbon monoxide were available with the associated pump and hose arrangement.

Initial Operators Comments: The vessel complies with SOLAS requirements of 2 independent instruments to test for carbon monoxide at any given point. The inspector required 2 electronic instruments to be provided in his interpretation of SOLAS.



SOLAS Chapter XI-1 Reg 7

Every ship to which chapter I applies shall carry an appropriate portable atmosphere testing instrument or instruments. As a minimum, these shall be capable of measuring concentrations of oxygen, flammable gases or vapours, hydrogen sulphide and carbon monoxide prior to entry into enclosed spaces. Instruments carried under other requirements may satisfy this regulation. Suitable means shall be provided for the calibration of all such instruments.

MSC.1/Circ.1477 GUIDELINES TO FACILITATE THE SELECTION OF PORTABLE ATMOSPHERE TESTING INSTRUMENTS FOR ENCLOSED SPACES AS REQUIRED BY SOLAS REGULATION XI-1/7

7 The instrument should be capable of measuring and displaying concentrations of:

- .1 oxygen;*
- .2 flammable gases or vapours (% of LFL);*
- .3 carbon monoxide; and*
- .4 hydrogen sulphide,*

ISGOTT VI 2.4.1

Tankers should be equipped with at least two instruments capable of measuring, as a minimum, concentrations of oxygen, flammable gases or vapours (% LFL), H2S and CO in order to carry out the tests required for enclosed space entry.

Every instrument should have a manual that describes its features, settings and alarms and explains calibration, testing, operation and maintenance. The information in the manuals should be available in the working language of the tanker.

According to SOLAS XI-1/7 the "instrument" ;

The minimum battery life of the instrument (with fresh batteries of recommended type) should be 10 hours..

The instrument display should be readable in all lighting conditions.

Portable gas testing tubes do **NOT** meet the above requirement, hence the operators interpretation of SOLAS XI-1/7 and ISGOTT VI 2.4.1 incorrect.