

Inspector Bulletin

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22nd Jun 2022

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Interesting observations

VIQ 5.2 Is there evidence of a permit to work system in place for hazardous activities, are the crew aware of these requirements and is there documented evidence of compliance?

Inspector Observations: A specific control of work form was required to be completed for critical equipment being taken out of service. The inspector requested sighting the date of the last oil change and control of work documentation for the emergency generator as this required taking the equipment out of service for a short period of time. Such documentation was not available and it was identified that no such specific control of work form or risk assessment had been completed for the job.



TMSA Element 4A Stage 1 requires risk mitigation measures when critical equipment is taken out of service even for routine maintenance. Inspectors are encouraged to check that correct control of work measures have been implemented and review examples of recent work on critical equipment or systems.

VIQ 8.72 Are officers aware of the operation of the chemical dry powder system, and is the system in good order?

Inspector Observations: The fixed dry powder stations contained sodium based chemical reagent rather than potassium based as recommended by MSC.1/Circ.1315.

Initial Operator Comments: Root Cause:

MSC.1/Circ.1315 under section 2.2 states that DCP should be made of Sodium or Potassium bicarbonate however in section 3.4 states that chemical based on the salts of potassium should be used.

Dry Chemical Powder onboard the vessel has Sodium bicarbonate as the medium. However, MSC.1/Circ.1315 is applicable only for vessels constructed on or after 1 July 2016. Since the vessel was delivered in 2010, this circular is not applicable in this case.

In this case the inspector had misunderstood the date that MSC.1/Circ.1315 applied from and in this case did not apply to this vessel. It is important to ensure that regulations are applicable to vessels and inspectors are encouraged to check this.

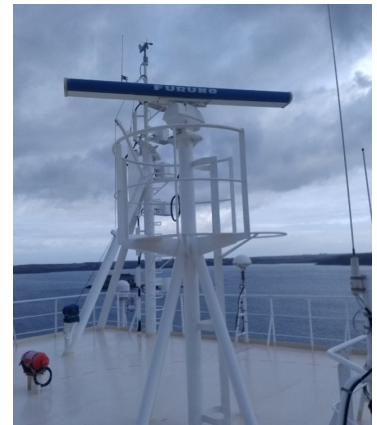
In the case of MSC.1/Circ.1315

- All new ships must have Potassium based powder, regardless of flag and class after 1 July 2016 (keel laid date).
- EU flagged ships with equipment installed after 5th October 2012 must have circ. 1315-approved system.
- EU flagged ships with equipment installed after 5th October 2012 with system approved with Sodium based powder are not compliant, and must bring the systems into compliance.
- Certificates not stating maximum pipe length and lowest tested operating temperature are not valid according to circ. 1315.



4.2 Is the vessel maintaining an adequate record of all navigational activities, both at sea and during pilotage?

Inspector Observations: Records of performance monitor tests of the radars noted them being taken each watch when the vessel was underway. However, the OOW was unable to advise the inspector that the measurements taken for the PM tests were acceptable range or not as he was unaware of where to find the reference data. The OOW later demonstrated to the inspector the manufacturers data for each radar.



8.11 Are the cargo and ballast system valves in good order and is there recorded evidence of regular testing?

Inspector Observations: Records of opening and closing times of the remote operated cargo valves were taken on a 3 monthly basis. However, there was no reference data available to confirm what the required operational speed range should actually be. The OOW interviewed was unaware of such data or where to find the reference information and the practice had been to just check the previous 3 months timings to ensure the range was close to that previously entered.

Both of these observations are similar in that the OOW was unaware of what standard reference they were checking against. It is all very well for records of operational equipment tests to be



performed, but it is equally important that the OOW knows what he/she is checking for the results to be acceptable or not.

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5.36 Are records available to show that samples of foam compound have been tested at regular intervals?



Except for tests above, the first periodical control of foam concentrates should be performed not more than 3 years after being supplied to the ship, and after that, every year. The tests required above should be performed prior to delivery to the ship and annual thereafter. (MSC.1/Circ.1312).

Inspectors observations: The vessel was provided with additional foam stowed in sealed 20 litre drums. One drum was noted indicating the seal being breached. Date of manufacturer of the foam stamped as 2018. There was no record as to when the seal was broken and no further foam test performed or recorded on this particular foam sample.

Reference MSC. 1/Circ.1432 7.11 states

.3 portable containers or portable tanks containing foam concentrate, excluding protein based concentrates, less than 10 years old, that remain factory sealed can normally be accepted without the periodical foam control tests required in MSC.1/Circ.1312 being carried out;

.4 protein based foam concentrate portable containers and portable tanks should be thoroughly checked and, if more than five years old, the foam concentrate should be subjected to the periodical foam control tests required in MSC.1/Circ.1312, or renewed; and

.5 the foam concentrates of any non-sealed portable containers and portable tanks, and portable containers and portable tanks where production data is not documented, should be subjected to the periodical foam control tests required in MSC.1/Circ.1312

VIQ 4.14 Are Master and deck officer's familiar with the operation of the ECDIS system fitted on board?

Inspector Observations: The officer interviewed was unable to satisfactorily demonstrate the operation of DR mode on the ECDIS.

It was later identified that the input from both GPS systems had to be switched off to the ECDIS for the ECDIS to change over to DR mode operation.



We often have observations relating to this issue as for many ECDIS and older software versions it is not possible to change over the ECDIS manually to DR mode without having to isolate the power from the GPS itself. This is particularly important where you have GPS spoofing or poor signal quality that indicates the GPS position maybe okay at first glance.

3.6 Are those officers who have immediate responsibility for cargo transfer, in possession of the Certificates of Specialized Training as applicable to the type of cargo being carried?

Inspector Observations: The vessel had a valid International Certificate of fitness for the Carriage of Dangerous Chemicals and recently trading (for 3 months) in CPP cargo only. One of the watchkeeping officers held a certificate for basic training for Chemical tanker cargo operations and operational level for oil tanker operations.

Due to the nature of the vessels trade there is no immediate risk for the officers certification handling the present CPP cargo hence this would not be an observation. However, the inspection would of course need to be conducted using the oil tanker variant and should the vessel change trades to annex 2 cargo then the officer in question should have operational level training for chemical tankers.

2.1 Are all the statutory certificates listed below, where applicable, valid and have the annual and intermediate surveys been carried out within the required range dates?

Inspector Observations: The vessels electronic statutory certificates could not be accessed online with the vessels internet access. The inspector was able to view them through his phone using the QR codes however.

Electronic certificates may be permitted in lieu of the traditional paper versions. Administrations that use electronic certificates should ensure that these certificates have the following features: -

- *validity and consistency with the format and content required by the relevant international convention or instrument, as applicable*
- *protected from edits, modifications or revisions other than those authorized by the issuer or the Administration; and*
- *a unique tracking number used for verification as defined in paragraphs 3.5 and 3.6. IMO FAL. 5/Circ. 39/REV. 2.*

This should not be considered an observation on the basis that the certificates could actually be verified using the QR codes for authenticity onboard.

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