



STEAMSHIP MUTUAL Risk Alert



IMO Sulphur 2020 – Fuel Oil Tank Entry



This Risk Alert has been written by Captain John Taylor, of the Loss Prevention Team

Introduction

With the latest regulations regarding the sulphur content of fuel oils used on board vessels due to come into force on 1 January 2020 it is anticipated that there will be a significant increase in the number of fuel oil tank cleaning operations being undertaken on Members' vessels. These tank cleaning operations will likely necessitate tank entry, an activity that many ships' crew may not have had an opportunity to regularly participate in and with which they may not be fully familiar. In addition, many of the spaces could be very small with restricted access. It is the associated risk to personnel of unusual work activities and entry into these confined spaces that has prompted the Club to issue this Risk Alert.



Furthermore, the tank cleaning activities will result in the collection of waste materials, the disposal of which will require proper consideration and compliance with International and local legislative requirements.

Background

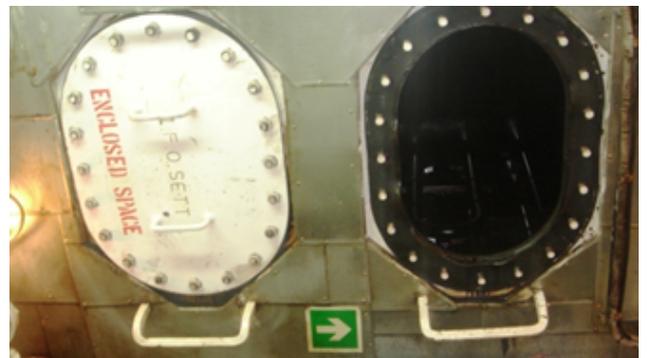
Enclosed space entry activities are recognised as a high risk activity, the risks being elevated where the space is of a particularly confined nature with potentially limited and obstructed access and egress, compounded with the potential for slip, trip and fall hazards associated with the oil coated surfaces.

Having successfully cleaned the tanks it will be necessary to ensure proper and appropriate disposal of the tank cleaning residues in accordance with the requirements of MARPOL ANNEX I, including the completion of all appropriate documentation for proper disposal at approved reception facilities.

Guidance

Specific Areas that the Club would like to highlight include:

- Following the Company SMS, including appropriate, robust enclosed space entry procedures, paying particular attention to the requirement for a detailed and thorough Risk Assessment being carried out prior to undertaking the activity.



- All appropriate permits for gas freeing and isolating of tanks must be in place. Gas testing equipment must be certificated and properly calibrated. It should be emphasised that gas testing should take due account of accessing remote areas and that personnel entering the space should each carry their own personal gas monitoring equipment.
- Special care and attention, particularly in regard to personal protective equipment and ventilation, is to be exercised when using cleaning agents and chemicals.
- Persons on stand-by duty at the entrance to the enclosed space must be appropriately trained and exercised in the actions to be taken in the event of an emergency. Under **NO** circumstances should a rescue attempt be made without the use of breathing apparatus. Speed of response is of **CRITICAL** importance
- Access and egress from bunker tanks can be very restricted, and the tanks themselves can, in some cases, be very small with limited space for persons to move around, presenting multiple trip hazards.



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Due to the presence of oil covered surfaces bunker tanks will be slippery with an increased risk of slips and trips.



Some members will choose to engage specialist tank cleaning contractors to undertake the tank cleaning work. It is important that an equally high level of vigilance is exercised to ensure that the contractor is following robust enclosed space entry procedures and that adequate shipboard oversight is in place.



Members are once again reminded of previously issued Steamship Mutual Risk Alerts addressing enclosed space entry:

[RA 16 The Dangers of Confined Spaces](#) – Identifying an enclosed space and the potential causes / sources of oxygen deficiency together with guidance on how to effect safe entry of a confined space. It is important that seafarers can identify those spaces that do not obviously appear to pose a risk!

[RA 19 – Dangerous Spaces](#) – Highlighting the potential presence of a dangerous atmosphere, even

in seemingly safe spaces.

[RA 47 – Concentrated Inspection Campaign \(CIC\) on Enclosed Space Entry Drills](#) – In addition to Reminding Members of the CIC that the Maritime Administrations of Paris and Tokyo were undertaking in 2015 this Risk Alert also provided the list of ten questions that PSCO's of the participating MOU's would be asking, the first 8 of these remain valid as questions to be addressed when considering all enclosed space entry activities.

Should Members have any questions regarding this Risk Alert please contact the Club's [Loss Prevention Department](#).