

Human Element Maritime Enhancement Tool (H.EL.M.E.T)

**HELMET ELEMENT 10****Item 3.2 “Cargo operations and Related SMS”**

FINDING: During an onshore HELMET assessment, our HELMET Assessor noticed that at the Company SMS it was not identified that washing of tanks containing oil cargoes should only be conducted under Inert Atmosphere conditions.

Ref. ISGOTT 11.1.6.9, 12.3.2 and to industry’s standards: TMSA 6.2.4

Is this important?

Due to the material characteristics of oil cargoes, the cleaning of oil cargo tanks can put the safety of the personnel, the vessel and the environment at risk when necessary safety precautions are not applied. More specifically, flammable vapors and gases produced by oil cargoes contained in cargo tanks usually remain present in the tanks even after discharging, until tanks’ washing takes place. In the presence of such vapors/gases, oxygen and heat, a fire, yet an explosion might occur.

Crude oil washing (COW) requires that inert atmosphere conditions are in place throughout the procedure, in order to keep the oxygen content below 8% by volume and the atmosphere positive, thus mitigate the risk of explosion.

In this particular case, omitting to state inert atmosphere conditions as a prerequisite to proceed with tank washing in the SMS, constitutes non-compliance with ISGOTT elements 11.1.6.9 (with regard to tank washing, including COW) and 12.3.2 (with regard to tank washing risk management) and TMSA item 6.2.4 (with regard to tank atmosphere control and monitoring). Additionally, poor maintenance of an up-to-date SMS with regard to regulatory requirements for cargo transfer operations is also identified.

SUGGESTION: The procedures described in the Company SMS must be regularly reviewed towards maritime regulations and optimized to ensure that all aspects of safe operations are covered, according to the identified cargo-specific hazards for all fleet vessel types. Finally, proper documentation of the washing process shall be encouraged by the office in the context of a verification and audit plan.

Notice: Tip of the month is circulated by P@S monthly in an effort to inform the industry of the red flags raised from the implementation of our onshore and onboard HELMET risk assessment program to meet highest standards, carried out by H.EL.M.E.T. Assessors.

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