



PREVENTION AT SEA

CIRCULAR 06/2019

“WHEN WAS THE LAST TIME
YOU TESTED THE BUNKER
PIPELINES?”

Don't Cure,
PREVENT

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Case: During a H.EL.M.E.T. (Human Element Maritime Enhancement Tool) assessment on a Bulk Carrier, the PaSea Assessor observed that the bunker pipelines were not tested in accordance with the CFR § 156.170 requirements. In addition, the Crew was not familiar with the testing procedure.

A month later, during a USCG inspection the vessel was detained due to the aforementioned reasons in San Francisco. In addition to the detention, the planned bunkering operation was forbidden until the required testing was performed.

Regulatory Framework

§ 156.170 Equipment tests and inspections requires, among other;

- each loading arm and each transfer pipe system, including each metallic hose, must not leak under static liquid pressure at least 1.5 times the maximum allowable working pressure (MAWP)

The frequency of the tests & inspections required must be annual or part of the biennial and mid-period inspections

ISGOTT 10.11.3 states:

Pipelines should be visually examined and subjected to routine pressure tests to verify their condition. Other means of non-destructive testing or examination, such as ultrasonic wall thickness measurement, may be considered appropriate but should always be supplemented by visual examination.

What went wrong ?

- The Crew members did not follow the established procedures in the Company's SMS, in which guidelines were provided for the annual testing of the bunker pipelines.
- The Company had not provided the Crew with clear instructions on how to perform the aforementioned testing.
- Training procedure for the involved personnel in bunkering operations was not evidenced.

WHAT ACTIONS SHOULD BE FOLLOWED AFTER THE TEST?

In order to document this procedure the following need to be done after the pressure test:

- An entry to be made to the engine log book stating that the pressure test was carried out.
- All bunkering lines to be stenciled with the date of the test & the test pressure.
- A "certificate of annual test" should be issued, signed and stamped by the Master and the Chief Engineer. This "certificate of annual test" can be issued from the Master in a specified format. This certificate should be kept in a relevant file and should be always available to Port Authorities that may request it.
- The means of testing (i.e. equipment - flanges, gauges etc.) may be requested to be demonstrated, therefore, training of the Crew is suggested to be held at specified intervals.



Correctly stenciled



The test date, pressure and the medium used for the test should be also stenciled



The medium used for the test should be also stenciled

BEST PRACTICE

- Ensure that the annual test of the bunker pipelines and associated equipment is conducted properly.
- Further training and familiarization to be provided to the Crew. Regular bunker/oil spill drills to encourage familiarisation with bunker systems and procedures.
- Ensure that appropriate record keeping is kept.
- Appropriate maintenance and testing of systems and pipelines, including calibration of remote tank gauges.
- Provision of suitable instructions for operation and for emergency response, including bunker check lists and a bunker plan.

Remember: Any vessel found conducting or having conducted bunkering operations in the US without records showing compliance with the testing regulations are subject to detention or a civil penalty.

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FOR MORE INFORMATION,
PLEASE DO NOT HESITATE TO CONTACT US.



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