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Date: 17/12/2018

Dear Captain
Good Day,

Coal is known for its flammable, self-heating properties due to oxidation and subsequent carbon monoxide production. The IMSBC Code has so far placed coal within Group B. Certain coal cargoes may however be liable to liquefaction. Accordingly, and with effect from 1st January 2019 an amendment to the code will come into force whereby coal will **also** fall into Group A. As a result all coal cargoes are to be considered as both liable to liquefy and present a chemical hazard.

Attached you may find a newsletter about subject matter.

In this newsletter reference is made to IMO Resolution MSC.426(98) which can be found in the 'KR-Con" available on board fleet vessels.

You are requested to confirm receipt , discuss the contents in the next consolidated meeting on board and keep a copy in DA-11 file.

Best Regards,

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NEWSLETTER NO. 5 / 18

New IMSBC Code requirements from 1st January 2019 IMO Resolution MEC.426(98) Coal cargoes

13th December 2018

The International Maritime Solid Bulk Cargoes (IMSBC) Code describes the associated hazards of certain bulk cargoes and provides the precautionary measures which should be taken when carrying the same. The code classifies Group A , cargoes which may liquify if shipped with a moisture content in excess of their Transportable Moisture Limit (TML) if 75% or more of the material consists of fine particles under 5mm size. Group B deals with cargoes which possess a chemical hazard which could give rise to a dangerous situation on a ship.

Coal is known for its flammable, self-heating properties due to oxidation and subsequent carbon monoxide production. The IMSBC Code has so far placed coal within Group B. Certain coal cargoes may however be liable to liquefaction. Accordingly, and with effect from 1st January 2019 an amendment to the code will come into force whereby coal will also fall into Group A. As a result all coal cargoes are to be considered as both liable to liquefy and present a chemical hazard. New criteria provided under the IMSBC code sets out the exception that may place the cargo only in Group B.

The exception can be summarised as follows;

If the particles are large enough it will not be a Group A cargo, but it may be difficult to get within the exception. No more than 10% can be less than 1 mm and no more than 50% can be less than 10 mm. Both criteria must be met.

A failure to have shippers cargo declaration for the cargo showing particle distribution that meets the criteria will place it automatically under Group A, requiring TML and FMP to be established for safe loading.

Alternatively, we understand that the competent authority of the country of loading can specify laboratory criteria to assess whether or not a coal cargo possesses Group A properties. Such criteria would most likely be based on the outcome of the test methods for Group A cargoes in Appendix 2 of the IMSBC Code.

The IMO Resolution MSC.426(98) should be consulted for the technical detail and operational requirements prior to the loading and carriage of coal.

We have previously dealt with the question of cargoes liable to liquify in Newsletters which addressed the cargoes of concentrates such as nickel ore and iron ore fines.

For more details on Group A cargoes and TML testing please see our previous Newsletters but in summary, for a Group A cargo TML and FMP always need to be established by the shipper and provided to the vessel in accordance with the Code before loading. The intervals between sampling/testing and loading are established by the code as follows:

"4.5.1 The shipper shall be responsible for ensuring that a test to determine the TML of a solid bulk cargo is conducted within six months to the date of loading the cargo. Notwithstanding this provision, where the composition or characteristics of the cargo are variable for any reason, the shipper shall be responsible for ensuring that a test to determine the TML is conducted again after it is reasonably assumed that such variation has taken place.

4.5.2 The shipper shall be responsible for ensuring that sampling and testing for moisture content is conducted as near as practicable to the date of commencement of loading. The interval between sampling/testing and the date of commencement of loading shall never be more than seven days. If the cargo has been exposed to significant rain or snow between the time of testing and the date of completion of loading, the shipper shall be responsible for ensuring that the moisture content of the cargo is still less than its TML, and evidence of this is provided to the master as soon as practicable."

Testing for the coal TML introduces a new method. This is a modification to the Proctor/Fagerberg (PF) procedure and is significantly different from the existing PF methods in use for example for those modified for iron ore fines. There is a new procedure on how to deal with lumps over 50 mm in the sample, as well as different Proctor hammer and a different cylinder than other PF methods. Drying ovens should have forced circulation or use an inert gas, unlike ovens used for the other TML test methods. It is anticipated that suitable TML test facilities will not be widely available in commercial coal laboratories, at least in the short term.

We remain at your complete disposal for any further information or advice on this matter.
This Newsletter, and our information archive, can also be accessed at www.pferrari.com

P.L. Ferrari & CO. S.r.l.