

MARITIME SAFETY COMMITTEE
93rd session
Agenda item 10

MSC 93/10/14
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SHIP DESIGN AND CONSTRUCTION

Unified Interpretation on the application of PSPC for COTs (resolution MSC.288(87))

Submitted by INTERTANKO

SUMMARY

Executive summary: This document suggests a change on the suggested unified interpretation for the definition of "GOOD condition" of the coating. A coating with GOOD condition should have less than 3% (instead of 5% as suggested) of spot rusting of the area under consideration. This will be consistent with the unified interpretation for the definition of GOOD condition in MSC.1/Circ.1378 for application of the PSPC on sea water ballast tanks.

Strategic direction: 1.1

High-level action: 1.1.2

Planned output: 1.1.2.3

Action to be taken: Paragraph 9

Related documents: SDC 1/16; annex 7 and MSC.1/Circ.1378

1 This document is submitted in accordance with paragraph 6.12.5 of the *Guidelines on the organization and method of work of the Maritime Safety Committee and the Marine Environment Protection Committee and their subsidiary bodies* (MSC-MEPC.1/Circ.4/Rev.2), and comments on the report of SDC 1 (SDC 1/26).

2 INTERTANKO supports the outcome from SDC 1 to approve the draft MSC circular on Unified interpretations on the application of the Performance standard for protective coatings for cargo oil tanks of crude oil tankers, as referred to in paragraph 26.1.11 of document SDC 1/26.

3 However, INTERTANKO would suggest a modification to the suggested unified interpretation of the definition of GOOD condition of the coating. The suggested changes are indicated below with text to be removed being strikethrough and new text being underlined:

.1 page 2 of annex 7 to document SDC 1/26

"Paragraph 2 – Definitions

GOOD: Condition with spot rusting on less than ~~5%~~ 3% of the area under consideration without visible failure of the coating, or no-perforated blistering. Breakdown at edges or welds should be less than 20% of edges or weld lines in the area under consideration."

.2 page 6 of annex 7 to document SDC 1/26

"1.9.1 "Good" is defined as: Condition with spot rusting on less than ~~5%~~ 3% of the area under consideration without visible failure of the coating, or no perforated blistering. Breakdown at edges or welds should be less than 20% of edges or welds in the area under consideration."

4 INTERTANKO suggests this change in order to bring consistency with the definition of GOOD condition of coating under the unified interpretation for PSPC for seawater ballast tanks (MSC.1/Circ.1378).

5 INTERTANKO notes that the 5% limit for spot rusting is used to define the GOOD condition of the coating in the COTs of the crude oil tankers at the time of the renewal survey (reference to the *Guidelines on Procedures for in-service maintenance and repairs of coating systems for cargo oil tanks of crude oil tankers* (MSC.1/Circ.1399)).

6 INTERTANKO invites the Committee to agree on a different approach to define the GOOD condition of the coating in cargo oil tanks of the crude oil tankers at the new building stage and at the time of a renewal survey, after years in operations. Therefore, we suggest that for the new buildings, the maximum spot rusting should be less than 3% of the aggregate area coated, as it is defined for the seawater ballast tanks.

7 Cargo oil tanks have less structural elements than seawater ballast tanks of oil tankers. Therefore, coating application is less complicated than in sweater ballast tanks. This is another argument that the definition for the GOOD condition at new building stage is the same for COTs as it is for seawater ballast tanks.

8 INTERTANKO would also add that the rate of corrosion driven by the acid inert gas can be significantly higher in the COT compared to the ballast spaces. This is another argument to have at least the same definition of good condition in COTs.

Action requested of the Committee

9 The Committee is invited to agree with the suggested changes as given in paragraphs 3.1 and 3.2 of this document.
