

SUB-COMMITTEE ON CARRIAGE OF
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Agenda item 11

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**UNIFIED INTERPRETATION OF PROVISIONS OF IMO SAFETY, SECURITY, AND
ENVIRONMENT-RELATED CONVENTIONS**

Comments on document CCC 7/11/2

Submitted by IACS

SUMMARY

Executive summary: This document comments on the draft unified interpretation of paragraph 16.7.3.3 of the IGC Code, as proposed in document CCC 7/11/2

Strategic direction, if applicable: 6

Output: 6.1

Action to be taken: Paragraph 8

Related document: CCC 7/11/2

Introduction

1 This document is submitted in accordance with the provisions of paragraph 6.12.5 of 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.5/Rev.1) and comments on document CCC 7/11/2.

Discussion

2 IACS appreciates the work performed by INTERTANKO to develop the draft unified interpretation of paragraph 16.7.3.3 of the IGC Code. IACS, wishing to contribute to the aim of this work, has carefully reviewed the proposal and notes that the proposed draft unified interpretation is referring to trunk piston engines and is only addressing the crankcase gas detection issue.

3 In this respect, IACS believes that the first sentence of the proposed unified interpretation is applicable to Otto combustion process gas and dual fuel engines, and further

notes that gas detection is to be provided also to sumps (i.e. vent space) and charge air manifolds, according to paragraph 16.7.3.3 of the IGC Code.

4 Furthermore, IACS is of the view that gas detection for Otto combustion crosshead engine designs, is to be provided to the piston underspace side, unless otherwise justified by the safety concept of the engine.

5 As regards the second sentence of the proposed draft unified interpretation, IACS considers that it is applicable to all engine types (i.e. 4-stroke, 2-stroke, trunk piston, crosshead, Otto or Diesel combustion process engines). Additionally, the required detailed evaluation should be carried out also for the hazard potential of fuel gas accumulation in sumps, scavenge spaces/charge air manifolds and cooling system vents. The unified interpretation should clarify that this evaluation may identify alternative means to detect gas operation fault conditions.

6 Finally, the use of "should" is introduced instead of "shall" in the text of the draft unified interpretation which, if accepted, will be disseminated by means of a recommendatory circular.

Proposal

7 To address the points in the above discussion, IACS offers modifications to the draft unified interpretation of paragraph 16.7.3.3 of the IGC Code, proposed by INTERTANKO in the annex to document CCC 7/11/2, as follows:*

"1 Paragraph 16.7.3.3 of the *International Code for the Construction and Equipment of Ships Carrying Liquid Gases in Bulk* (IGC Code), as amended by resolution MSC.370 (93), reads:

'16.7.3.3 Crankcases, sumps, scavenge spaces and cooling system vents shall be provided with gas detection (see 13.6.17).'

Interpretation

2 For Otto combustion process gas and dual fuel engines where the space below the piston is in direct communication with the crankcase, gas detection should ~~shall~~ be provided to the crankcase, sumps (vent space) and charge air manifolds unless otherwise justified by the safety concept of the engine.

3 For Otto combustion crosshead engine designs, gas detection should be provided to the piston underspace side unless otherwise justified by the safety concept of the engine.

4 For all engine types (4-stroke, 2-stroke, trunk piston, crosshead, Otto or Diesel combustion process), A a detailed evaluation regarding the hazard potential of fuel gas accumulation in the crankcase, sumps, scavenge spaces/charge air manifolds and cooling system vents should ~~shall~~ be carried out and reflected in the safety concept of the engine. This may identify alternative means to detect gas operation fault conditions."

Action requested of the Sub-Committee

8 The Sub-Committee is invited to consider the foregoing and take action as appropriate.

* Tracked changes are indicated using "strikeout" for deleted text and "grey shading" to highlight new insertions.