

ORegarding: Proposal text amendment article 9.3.x.40 and 7.2.4.40**Introduction**

The ADN has various regulations regarding the fire extinguishing arrangements on board inland waterway vessels. Specifically for inland tankers the article 7.2.4.40 makes clear that fire extinguishing arrangements need to be kept ready for operation in the cargo area during loading and unloading. The first time this proposal was brought up was during the sixteenth session of WP 15.AC.2.

See: <http://www.unece.org/trans/doc/2010/wp15ac2/WP15-AC2-16-inf13e.doc>

After having discussed the first proposal it was made clear that involving the administrative committee in an acceptance process was undesirable.

Existing text

9.3.x. (1, 2 and 3) 40 Fire-extinguishing arrangements

9.3.x.40.1 This system shall comply with the following requirements

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- It shall be provided with a water main fitted with at least three hydrants in the cargo area above deck. Three suitable and sufficiently long hoses with spray nozzles having a diameter of not less than 12 mm shall be provided. It shall be possible to reach any point of the deck in the cargo area simultaneously with at least two jets of water which do not emanate from the same hydrant

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Background

An incident investigation in the Netherlands in 2007 resulted in the interpretation of the Dutch regulatory agencies regarding article 7.2.4.40 which has resulted in the rolling out of the fire hoses on deck.

7.2.4.40 Fire-extinguishing arrangements

During loading and unloading, the fire extinguishing systems, the hoses and spray nozzles shall be kept ready for operation in the cargo area on deck.

Let us make clear that the EBU believes that safety prevails above other issues however the investments in newly developed techniques like the so-called mini monitor shown below are being frustrated by the wording of existing text formulated in 9.3.x.40.1 indicating that sufficient long hoses need to be present. No investments are being made into such techniques when the rolling out of fire hoses is considered mandatory during loading and unloading even after such new techniques are installed on board the vessels.

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Picture: hydrant point equipped with jet/spray nozzle – with a hose of sufficient length. The somewhat “vulnerable” hose could be replaced by a fixed waterline altogether however current legislature indicates a hose is to be present.

Proposal

9.3.x.40 Fire-extinguishing arrangements

9.3.x.40.1 This system shall comply with the following requirements

- It shall be supplied by two independent fire or ballast pumps, one of which shall be ready for use at any time. These pumps and their means of propulsion and electrical equipment shall not be installed in the same space.

- It shall be provided with a water main consisting of pumps with a permanent underwater connection, a fire-main with hydrant points, and or fire hoses complete with couplings, and jet nozzles or, preferably, jet/spray nozzles having a diameter of not less than 12 mm in the cargo area above deck. A sufficient number of hydrants are provided and located so as to ensure that two jets of water can reach any part of the deck simultaneously with at least two jets of water which do not emanate from the same point.

In cold weather, the freezing of fire-mains and hydrants should be prevented by continuously bleeding water overboard from hydrants at the extreme end of each fire-main. Alternatively, all low points of the fire-main may be kept drained.

A spring-loaded non-return valve shall be fitted to ensure no gases can escape through the fire-extinguishing system into the accommodation or service spaces outside the cargo area.

- The capacity of the system shall be at least sufficient for a jet of water to have a minimum reach of not less than the vessel's breadth from any location on board with two hydrant points being used at the same time.

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7.2.4.40 Fire-extinguishing arrangements

During loading and unloading, the fire extinguishing systems, the fire main with hydrant-points and attached ~~the~~ hoses and/or jet/spray nozzles shall be kept ready for operation in the cargo area on deck.

Justification

Since the rolling out of the fire hoses and fitting the spray nozzles appropriately is time consuming one often leaves these hoses lying on deck even when there are no loading and unloading activities. During loading and unloading, the hoses form a bottleneck with applicable occupational safety and health regulations since one can easily trip over such hoses. Further, the hoses are more vulnerable in the hazard zone increasing the chance of damage in the event of an emergency and thus reducing the fire fighting capacity of the crew.

The proposed text aligns with the text used in the ISGINTT (International Safety Guide for Inland Tankers and Terminals) and IBC (International Bulk Code).

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