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Marine Risk Consultants.***

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# **CIRCULAR Holds Preparation Advisory.**

**Buenos Aires, 27 th December 2019.-**

Due to the existing situation we are having again in Hidrovia with holds preparation to load grain, we decided to issue this circular.

We suggest:

- To appoint the surveyors some days in advance before the ship calls our ports.-
- If possible, it would be convenient to send periodic reports and photographs of the progress during hold's preparation. Once first hold is ready we can advice on what should be improved.
- Pictures should include close up, not only general pictures, on the sides, tank top, pipe brackets, holds ladders, under deck girders, frames and transversals as well as in ventilators areas and bilges in order to get a better idea of hold's condition. (We can assist with a *photo-report guidelines*)
- Keep in mind that local surveyors are very strict.
- It is important that upon arrival at loading port all the holds will be clean, dry, odorless and free of rust scale and live insects.
- As a guidance, the international industry accepted definition of "grain clean" is provided by the National Cargo Bureau (NCB).
- "Compartments are to be completely clean, dry, odour-free, and gas-free. All loose scale is to be removed."

This definition implies that:

1. All cargo residues are to be removed from the hold,
2. Any loose paint or rust scale must be removed,
3. If it is necessary to wash the hold, as it generally will be, the holds must be dried after washing,
4. The hold must be well ventilated to ensure that it is odour-free and gas-free,

Locally, as per the ARGENTINE AGRI-FOOD, HEALTH AND QUALITY NATIONAL SERVICE (SENASA), - a government body - a cargo hold will be considered not suitable for the loading of grain products if one of the following items is present:

1. Live insects.
2. Loose rust scale.
3. Moisture.
4. Damages or leakage.
5. Odor.
6. Fresh paint.
7. Rest of previous cargoes.
8. Excrement of sign of the presence of animals or rodents.
9. Defective closing of hath covers.



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The following must be considered:

- **Cargo residues:** Regardless the nature of previous cargoes, all traces of prior shipments must be completely removed.
- Particular attention should be paid for cargo residues wedged behind pipe brackets, holds ladders, under deck girders, frames, beams, transversals or other fittings in the holds, as well as in ventilation areas. Hold bilges and hatboxes should be clean and free of cargo residues. Deposit of previous cargoes in hard to reach places would be considered as well as cause of rejection.
- A careful cleaning has to be performed behind pipe brackets, holds ladders, under deck girders, frames, beams, transversals or other fittings in the holds, as well as in ventilation areas.
- Particular attention should be paid for cargo residues wedged **behind frames**, pipe brackets, holds ladders, under deck girders, beams, transversals or other fittings in the holds, as well as in ventilation areas, since official surveyors carefully inspect those areas and usually preform a withe glove or withe rag test.
- **Not acceptable:** Lack of cleanliness behind frame.
- **Not acceptable:** cargo residues wedged on holds ladders platform added to paint flakes and rust scales.
- **Not acceptable:** cargo residues on pipe brackets.
- **Not acceptable:** Cargo residues underneath hatch covers steelwork.
- **Not acceptable:** Traces of previous cargo over tank top.
- **Cargo stains:** are not acceptable if they are transferable to next cargo, i.e. if they rub off with a white glove, cloth or even bare hand. Surveyors give coal and petcoke stains particular attention because their grease nature as well as they can blister and peel the paint work if the hold starts to sweat. However, sometimes and even not transferable, large, extended and extremely decolored steelwork due to cargo stains could be considered not acceptable by cargo surveyors. Grain cargoes that are highly susceptible to discoloration and taint, should only be stowed into holds where the paint covering is intact and not stained.
- **Not acceptable:** Transferable stains at hatch covers.
- **Flaking paint:** The holds will be declared unfit if paint flaking is found.
- **Loose scale:** It is important to differentiate such scale from oxidation rust i.e. light atmospheric rusting. Loose scale will break away when struck with a fist or when light pressure is applied under the edge of the scale. Generally, the presence of hard-adhering scale within a hold is acceptable. However, those scales should not fall during the voyage or during normal cargo operations. Thus, since above criteria is highly relative and based merely on surveyor's opinion, usually is a highly controversial matter. Consequently, it is decidedly beneficial to remove all loose scale from cargo hold.



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- **Not acceptable:** Presence of rust and debris on drain channel will eventually lead to the clogging of drain hole.
- Official surveyors will in detail and carefully check for dirt, flaking paint and loose rust scales even at difficult to reach places.
- **Not acceptable:** Loose rust scales.

### **Definitively not acceptable.**

- **Oxidation rust:** will typically form on bare metal surfaces but will not flake off when struck or when light pressure is applied. However, we would like to emphasize the importance of keep all surfaces, especially tank tops, free of rust dust. Acting surveyors are paying more and more attention to this matter. Therefore, we strongly suggest keeping tank tops as well as lower stool and hoppers in cargo holds (sometimes while rinsing tank tops the splash convey dust to them) completely free of dust from rust and previous cargoes.
- **Not acceptable:** Rust dust on tank top.
- **Touch up with paint:** For rusty cargo holds the touch up with paint will certainly improve the cosmetic appearance. Be sure you have enough time to let the paint adequately cure and sufficiently time to ventilate after paint touch up in order to avoid paint odor during holds inspection.
- **Unsanitary conditions:** If a hold is found to contain animal filth, bird droppings, feces or sewage, it will be rejected. In the same manner, there must be no evidence of rats or rat droppings.
- **Wetness:** All holds must be dry. If the holds contain water or leaking water, the vessel will be declared unfit. Bilges and bilge wells must be dry.
- **Odours:** All cargo holds must be odour-free. This includes odour from paint and cleaning chemicals.
- **Infestation:** Holds will be declared unfit to load grain if insects, dead or alive, are found. The holds will also be declared unfit as well if larvae or unhatched insect eggs are found. Special attention must be given to exposed areas such as under hatch covers, hatch coamings, access ways and bottom areas of the bulkheads, slopes and tank tops. All adjacent spaces to the holds, (for example, mast houses and storage spaces) should be inspected to ensure that they are also infestation-free.
- **Deck:** Must be clean and free of traces of previous cargoes, this usually makes a superior first impression of the ship to the acting surveyors than a deck with remnants of previous cargoes.
- **Test cargo holds cleanliness:** After finishing cargo holds cleaning, perform a white glove test in all hold's surfaces, especially on remaining stains, if any, to be sure they are not "transferable stains". If it is not passed, repeat cleaning procedures until the results are satisfactory. Moreover, lately, holds surveyors are carrying test over the stains with bare hands, which is more severe since the moisture of the bare hand allows more transference than a dry white glove. If you are in doubt with any stain, a bare hand test would be conclusive.



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- **Acceptable:** (but not desirable) Dark stain that is not transferable to next cargo even rubbing with bare hand.
- **Acceptable:** (but not desirable) Rust stain that is not transferable to next cargo even rubbing with bare hand.
- **Just before arrival:** It is a good practice to sweep again cargo holds just before the arrival to loading port to remove dust settled or any insect dead or alive. Be careful not to produce so much dust in the air during this process, since it may deposit on cleaned parts of the hold. Special attention should be paid to dented areas of tank tops, since are prone to accumulate dust. In the same manner, attention should be paid for any condensation and, if any, must be mopped to dry.
- **During holds inspection:** It is recommendable to open cargo holds just few minutes before hold's inspection, of course bearing in mind the oxygen levels, in order to avoid the re-entrance of flying insects. If holds are dry and odorless there is no need to open hatch covers in advance. Upon boarding your good vessel, usually surveyors will first review some documents before to enter into cargo holds, thus upon surveyor's boarding will be a good time to start open hatches.

In order to speed up the process, it is recommendable to have ready in hand 4 sets of following documents, signed and stamped by master, usually requested by cargo surveyors:

- 1) Ship's particulars.
- 2) Crew List.
- 3) Last 6 cargos. (If different during the same trip must be discriminated by hold)
- 4) Cleaning method. (Just a short version with a very brief description of each stage)
- 6) Preliminary stowage plan.

Additionally, and optionally since it is not mandatory but usually makes a good impression to surveyors before the inspection, will be valuable to have ready some coffee, tea, cool water, soft drinks and snacks to offer them while they review the mentioned documents.

During Official Surveyor's attendance, hospitality is an important key to a successful inspection. So please kindly ensure that crew is attentive to surveyor's suggestions and recommendations. At no stage surveyor should feel that he is not being listened to or not given importance.

Preferably, Master & chief officer should personally attend the Hold inspection along with surveyor. Moreover, some brushes, brooms, shovels, mops and trash cans should be available as well as crew members to remove minor cleanliness details found by surveyors, if any, during holds inspection together with an aluminum ladder to let surveyors check higher structural items, particularly they used to check by with glove test or bare hand behind frames and over stained parts.

Finally, surveyors must bring their own white gloves for the inspection but would appreciate the provision of the same from the vessel and will be grateful for.



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### **DISCLAIMER.**

*We assumes that persons responsible for carrying out cleaning operations are familiar with United Nations IMO SOLAS and MARPOL Conventions as well as with all international and local related safety and environmental protection regulations. In the same manner, this guideline has been prepared as our best effort to capture our accumulated experience as well as industry best practices. Nevertheless, none of our recommendations overrides the paramount authority and responsibility of master in holds preparation process. Notwithstanding the diligence and carefulness performed in order to make this guideline as truthful, precise and accurate as practicable. We shall have no liability, whatsoever, for any loss, damage or expense allegedly caused directly or indirectly by their inaccuracy or the content of this guideline.*

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**Attended to the IG P&I Correspondent Conference, London 2017.-  
Subscriber Member of the Association of Average Adjusters (London)  
Ship Agent Course, Navigation Center 2016.**

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