CIRCULAR LETTER

№ 314-56-683c

dated

16.09.20132.

Re: IACS Unified Interpretation SC259 (Feb. 2013)

"For Application of SOLAS Regulation II-1/3-11 Performance Standard for Protective Coatings for Cargo Oil Tanks of Crude Oil Tankers (PSPC-COT), adopted by Resolution MSC.288(87)".

Item of technical supervision:

Anticorrosive protective coatings of cargo tanks

Implementation since

01.01.2014

Valid: till

ND re-publication

Validity period extended till

Cancels/amends/adds Circular Letter №

dated -

Number of pages:

1+3

Appendices:

Amendments to the Rules - 3 pages

Head of Classification and Development Directorate V.I. Evenko

Amends

Rules for Technical Supervision during Construction of Ships and Manufacture of Materials and Products for Ships; ND No. 2-020101-040

This is to inform that IACS Unified Interpretation (UI) SC259 (Feb. 2013) "For Application of SOLAS Regulation II-1/3-11 Performance Standard for Protective Coatings for Cargo Oil Tanks of Crude Oil Tankers (PSPC-COT), adopted by Resolution MSC.288(87)" will come into force on 1 January 2014. UI contains the explanations and amendments to the provisions of IMO Resolution MSC.288(87) in respect of the application and testing of protective coatings for cargo oil tanks of crude oil tankers. In connection with the mentioned above, the amendments specified in the Appendix to the Circular Letter shall be introduced to the Rules for Technical Supervision during Construction of Ships and Manufacture of Materials and Products for Ships, ND No. 2-020101-040.

It is necessary to do the following:

- 1. The amendments to the RS Rules attached to the Circular Letter shall be applied.
- 2. Content of this Circular Letter shall be brought to the notice of the RS surveyors, interested organizations and persons in the area of the RS Branch Offices' activity.

Person in charge:

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#### Amendments to

# the Rules for Technical Supervision during Construction of Ships and Manufacture of Materials and Products for Ships (2013)

## PART III. TECHNICAL SUPERVISION DURING MANUFACTURE OF MATERIALS

Para 3.1.2.2.5. The last sentence shall be supplemented with the following text: "and/or IMO Circular MSC.1/Circ.1399 "Guidelines on Procedures for In-Service Maintenance and Repair of Coating Systems for Cargo Oil Tanks of Crude Oil Tankers".

**Chapter 3.3** shall be amended to read:

- "3.3 APPLICATION OF PERFORMANCE STANDARD FOR PROTECTIVE COATINGS FOR CARGO OIL TANKS OF CRUDE OIL TANKERS IN COMPLIANCE WITH SOLAS REGULATION II-1/3-11 (IMO RESOLUTION MSC.288((87))
- **3.3.1** This Chapter supplements provisions of the Performance Standard for Protective Coatings for Cargo Oil Tanks of Crude Oil Tankers and shall be applied to the ships contracted for construction on or after 1 January 2014 in compliance with SOLAS-74 Regulation II/1/3-11 adopted by IMO Resolution MSC.288(87) (hereinafter referred to as "PSPC-COT"). This Chapter shall be read in conjunction with PSPC-COT.

#### 3.3.2 Interpretations to 2.6, Section 2 "Definitions" of PSPC-COT.

- **3.3.2.1** "GOOD" condition is defined as condition with spot rusting on less than 5 per cent of the area under consideration without visible failure of the coating, or no-perforated blistering. Breakdown at edges or welds shall be less than 20 % of edges or weld lines in the area under consideration;
- **3.3.2.2** Para 3.2.2.2 shall apply (in this para and hereinafter in the Chapter when the references to interpretations in 3.2 apply, the references to PSPC (MSC.215(82)) shall be considered as the references to PSPC-COT (MSC.288(87))).

# 3.3.3 Interpretations to 3.2, Section 3 "General Principles" of PSPC-COT.

- **3.3.3.1** Paras 3.2.3.1 3.2.3.4 shall apply.
- **3.3.3.2** Cargo Ship Safety Certificate or Cargo Ship Safety Construction Certificate shall not be issued until all the corrective actions required are implemented to the Register satisfaction.
- 3.3.4 Interpretations to 3.4 "Coating Technical File", Section 3 "General Principles" of PSPC-COT.
- **3.3.4.1** Paras 3.2.4.1 3.2.4.4, 3.3.3.2 shall apply.
- 3.3.5 Interpretations to 3.5 "Health and safety", Section 3 "General Principles" of PSPC-COT.
- **3.3.5.1** Para 3.2.5.1 shall apply.
- 3.3.6 Interpretations to 4.3 "Special application", Section 4 "Coating Standard" of PSPC-COT.
- **3.3.6.1** Para 3.2.6.1 shall apply.

## 3.3.7 Interpretations to Table 1 of PSPC-COT.

- **3.3.7.1** Para 3.2.7.1 shall apply.
- **3.3.7.2** Para.1.3 "Coating pre-qualification test".
- **3.3.7.2.1** Procedure for coating system approval.

Type Approval Certificate (CTO) showing compliance with the PSPC-COT Section 5 requirements may be issued if the results of either method A+C, or B+C (see below) are found satisfactory by the Register.

The Type Approval Certificate shall indicate the product and the shop primer tested. The Type Approval Certificate shall also indicate other type approved shop primers with which the product may be used, which have undergone the cross over tests in a laboratory meeting the requirements specified in 3.2.7.2.2.1.

The Technical Data Sheet showing all the information required by PSPC-COT 3.4.2.2 shall be attached to the Type Approval Certificate.

For winter type epoxy a separate pre-qualification test is required, including shop primer compatibility test according to Annex 1 to PSPC-COT. Winter and summer type coatings are considered different unless infrared (IR) identification and specific gravity (SG) data demonstrates that they are the same.

3.3.7.2.2 Method A: laboratory test.

**3.3.7.2.2.1** Paras 3.2.7.2.2.1 - 3.2.7.2.2.3 shall apply.

**3.3.7.2.2.2** An Epoxy-based systems may be used with the shop primers other than the one with which it was originally tested provided that, the other shop primers are approved as part of a system, PSPC-COT Table 1: 2.3 and Table 3.2, and have been tested according to to the immersion test of PSPC-COT Annex 1 or in accordance with Res. MSC.215(82), which is known as the "Crossover tests". If the test or tests are satisfactory, a Type Approval Certificate will be issued. In this instance the Type Approval Certificate will include the details of the epoxy and a list of all shop primers with which it has been tested that have passed these requirements. The Type Approval Certificate will allow the use of the epoxy either with the named shop primer or on bare prepared steel.

**3.3.7.2.2.3** Paras 3.2.7.2.2.5, 3.2.7.2.2.6 shall apply.

**3.3.7.2.2.4** Para 3.2.7.2.2.7 shall be apply, except the date of application.

**3.3.7.2.3** Method B: 5 years field exposure.

**3.3.7.2.3.1** Paras 3.2.7.2.3.1, 3.2.7.2.3.2 shall apply.

**3.3.7.2.3.2** Either class survey records from the Register or a joint (coating manufacturer/ Surveyor to the Register) survey of cargo tanks of a selected ship shall be carried out for the purpose of verification of compliance with the requirements of 3.3.7.2.3.1 and 3.3.7.2.3.6. The reporting of the coating in both cases shall be in accordance with the principles given in Section 4 of IMO Circular MSC.1/Circ.1399.

**3.3.7.2.3.3** The ship selected for testing shall have cargo tanks in regular use, of which:

at least one tank is exposed to minimum temperature of + 60 °C or ± 3 °C;

For field exposure the ship shall be trading in varied trade routes and carrying substantial varieties of crude oils including highest temperature and lowest pH limits to ensure a realistic sample: for example, three ships on three different trade areas with different varieties of crude cargoes.

**3.3.7.2.3.4** In case the selected ship does not meet the requirements specified in 3.3.7.2.3.3, the limitations on lowest pH and the highest temperature of crude oils carried shall be clearly stated in the Type Approval Certificate.

**3.3.7.2.3.5** Para 3.2.7.2.3.6 shall apply.

**3.3.7.2.3.6** All cargo tanks shall be in "GOOD" condition (refer to 3.3.2.1), excluding mechanical damages, without touch up or repair in the prior 5 years of operation.

Examples of how to report coating conditions with respect to areas under consideration shall be as those given in Section 4 of IMO Circular MSC.1/Circ.1399.

**3.3.7.2.3.7** Paras 3.2.7.2.3.8 – 3.2.7.2.3.10 shall apply.

**3.3.7.2.4** Method C: coating manufacturer.

**3.3.7.2.4.1** Paras 3.2.7.2.5.1 – 3.2.7.2.5.18 shall apply.

3.3.7.3 Paras.1.4 "Job specification" and 1.5 "NDFT (nominal dry film thickness)".

**3.3.7.3.1** Para 3.2.7.3 shall apply.

- 3.3.7.4 Para 2 "PSP (primary surface preparation)".
- 3.3.7.4.1 Para 3.2.7.4 shall apply.
- **3.3.7.4.2** Procedure for review of quality control of automated shop primer plants.
- **3.3.7.4.2.1** Paras 3.2.7.4.3 shall apply.
- 3.3.7.5 Paras 3.2 "Sa 2 1/2 on damaged shop primers and welds", 3.3 "Surface treatment after erection", 3.4 "In case of full or partial blasting 30 75 urn, otherwise as recommended by the coating manufacturer".
- **3.3.7.5.1** Para 3.2.7.5 shall apply.
- 3.3.7.6 Para 3.6 "Water soluble salts limit equivalent to NaCl after blasting/grinding".
- **3.3.7.6.1** Para 3.2.7.6 shall apply.
- 3.3.7.7 Para 4.3 "Testing of coating".
- **3.3.7.7.1** Para 3.2.7.7 shall apply.
- 3.3.8 Interpretation to PSPC Section 5 "Coating System Approval".
- **3.3.8.1** Para 3.3.7.2 shall apply.
- 3.3.9 Interpretations to PSPC Section 6 "Coating Inspection Requirements".

Procedure for assessment of coating inspectors' qualifications.

- **3.3.9.1** Paras 3.2.9.1, 3.2.9.2 and 3.2.9.3.1 shall apply.
- **3.3.9.2** Equivalent qualification arising from practical experience.

An individual may be qualified without attending a course where it can be shown that the individual:

has a minimum of 5-years practical work experience as a coating inspector of ballast tanks and/or cargo tanks during new construction within the last 10 years;

has successfully completed the examination given in 3.2.9.3.1.3.

- **3.3.9.3** Assistant coating inspectors.
- **3.3.9.3.1** Para 3.2.9.4 shall apply.
- 3.3.10 Interpretations to PSPC Section 7 "Verification Requirements".
- **3.3.10.1** Paras 3.2.10.1 3.2.10.3 shall apply.
- **3.3.10.2** Para 3.3.3.2 shall apply.
- 3.3.11 Interpretations to PSPC Section 8 "Alternative Systems".
- **3.3.11.1** Para 3.2.3.11 shall apply.
- 3.2.12 Interpretations to Annex 1 "Test procedures for coating qualification for cargo oil tanks of crude oil tankers" to PSPC-COT.
- 3.2.12.1 Reference standards in Annex 1 to PSPC-COT are mandatory.".

Paras 3.3 and 3.4 shall be renumbered 3.4 and 3.5 accordingly.