

August 11, 2004

## **FLEET SAFETY LETTER 04071.GEN**

### **RE: ENCLOSED SPACE ENTRY – IMO ASSEMBLY RESOLUTION A.864(20)**

Each year in the maritime industry tens of thousands of crewmen, officers, shoreside contractors, repair technicians, shipyard employees and longshoremen enter enclosed spaces; thousands enter such spaces that have not been properly vented and tested for either gas accumulation or oxygen content; hundreds, perhaps thousands, are overcome as a result; and scores die.

Within the first couple years after graduation from nautical college, a classmate of the undersigned died when entering unventilated, untested deep tanks. During the undersigned's tenure as a safety inspector for a major oil company, at least two seafarers on a company ship succumbed when they entered an after peak tank which had not been tested for oxygen deficiency.

In other incidents on Vanuatu flagged vessels, in the early to mid 1990's, two shoreside fumigation contractors, working on their own without ship personnel supervision, entered a cargo hold containing forest products in order to fumigate it. Within minutes one had died and the other became so ill he had to be hospitalized. In other cases, two engineers working in a vessel's bowthruster room without forced ventilation, were overcome by the vapors of a motor cleaning solution and died; a tankerman entered a cargo tank containing H<sub>2</sub>S gas without the proper breathing device and died; a cadet working in a freshly painted, poorly ventilated storeroom became ill from the paint fumes, and nearly collapsed.

And just four months ago, a young, enthusiastic AB, working on a bulk carrier loaded with petroleum coke (petcoke), entered the hold to take cargo samples, was overcome and died. A cadet who attempted to rescue him also succumbed but was eventually rescued and survived. The chief mate, who began to enter the hold, without a breathing device, in an attempt to rescue both the AB and the cadet, was held back by the third officer and reminded to use a breathing device: this action probably saved the chief mate's life.

All of these incidents remind us that entering or working in untested, improperly ventilated enclosed spaces may be hazardous to one's health, even deadly.

The International Maritime Organization recognizes the hazards of enclosed space entry. IMO published Assembly Resolution A.864(20) ***Recommendations for Entering Enclosed Spaces Aboard Ships***. I am enclosing a copy of that Resolution in the hopes that you will distribute it widely to your vessels, whether flying the Vanuatu flag or not, and ensure that it is reviewed at the next monthly safety meeting, and whenever enclosed space entry is being contemplated. Additionally, all newly joined crewmen, both officers and ratings, should be reminded of the dangers and the precautions that need to be taken.

As a footnote: when the rescuers finally entered the hold in their attempts to save the AB and the cadet, they wore Emergency Escape Breathing Devices (EEBDs). Although they were partially successful in their efforts, in that the cadet fully recovered, they put themselves at risk: EEBDs are not designed to be worn by rescuers in rescue situations. Self contained breathing apparatus should have been worn.

EEBDs were designed to be worn by personnel in an emergency situation to exit a space where breathing may be difficult or impossible, as in a smoke filled atmosphere. They are not designed to be worn for entry into, recovery of personnel, and thence egress from an enclosed space.

This Fleet / Safety Letter supersedes and replaces Fleet / Safety Letter 96023.GEN.

Donald J. Sheetz  
Executive Vice President