



Ship Type: Bulk Trade Area: Ukraine

Bulletin 381 - 09/04 - Problems with the Loading of Sulphur Cargoes in Bulk - Mariupol - Ukraine

We have been advised of the potential for sulphur claims in cargoes loaded at the sulphur terminal in Mariupol, Ukraine.

Sulphur is loaded utilizing grabs either ship-to-ship or wagon-to-ship. These methods create the possibility of self-ignition through sparking due to the extreme dryness of the sulphur. The sulphur loading chart (Code RTK No H-15.1) worked out by port authorities requires appropriate fresh water spraying of sulphur stockpiles. In order to avoid flash fires in cargo being loaded, a periodic fine freshwater spray should be directed into the hold. Steps should also be taken to avoid dropping the cargo from a height

In Mariupol the stevedores apparently ignore these careful loading requirements and use sea water from the ship's fire fighting system for the purpose of spraying or extinguishing a fire (irrespective of where the sulphur ignites - in the ship's hold or prior to loading).

The salinity level of Azov Sea water is low and therefore apparently may not cause damage but the Dangerous Cargo Declaration (DCD) issued in accordance with IMDG Code by the Ukrainian authorized body at the request of shippers, contains the clear indication that the use of sea water for spraying and for fire-extinguishing purpose is strictly forbidden.

Shippers or their forwarders often do not provide the master with the DCD prior to loading. Despite the right given to the master by the MS (Dangerous Goods and Marine Pollutant) Regulations 1997 (Regulation 10) not to take onboard any cargo without the DCD, the master in such situations may allow the loading to commence and as a consequence put himself in a breach of the regulations and deprive the ship of a defence.

Taking all the above into consideration we recommend Members undertake the following steps for protecting the ship's interests:

- masters should have appropriate manuals advising on safe practice for solid bulk cargoes;
- prior to loading the master should obtain a DCD from the shippers or their agent;
- prior to loading the master should issue the formal letter addressed to the stevedoring company and to the shippers requiring great care in the handling of the cargo to prevent the grabs from loading from heights of 1.0m from the tank top or cargo level in order to avoid the generation of powder. This letter should contain a provision putting the responsibility on the shippers for potential cargo contamination caused by use of sea water for spraying as this existing method at Mariupol port contradicts the DCD and sulphur loading chart adopted by Mariupol port authorities.

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