



# THE REPUBLIC OF LIBERIA

## LIBERIA MARITIME AUTHORITY

8619 Westwood Center Drive  
Suite 300  
Vienna, Virginia 22182, USA  
Tel: +1 703 790 3434  
Fax: +1 703 790 5655  
Email: [info@lisr.com](mailto:info@lisr.com)  
Web: [www.lisr.com](http://www.lisr.com)

### TECHNICAL LETTER 2017-01 19 October 2017

#### **Subject: Emergency Escape Breathing Devices (EEBDs)**

This technical letter is issued in order to clarify the Liberian Administration's interpretation of the SOLAS requirements regarding emergency escape breathing devices.

SOLAS II-2 Reg. 13.4.3 states that "On all ships, within the machinery spaces, emergency escape breathing devices shall be situated ready for use at easily visible places, which can be reached quickly and easily at any time in the event of fire. The location of emergency escape breathing devices shall take into account the layout of the machinery space and the number of persons normally working in the spaces".

SOLAS II-2 Reg. 13.3.4.2 states that for accommodation spaces on Cargo Ships "All ships shall carry at least two emergency escape breathing devices within the accommodation spaces."

In accordance with the abovementioned SOLAS regulations, the Liberian requirements for the number of EEBDs required on board a Liberian registered ship are as follows:

#### 1. EEBDs for machinery spaces on all Ships

The Administration is applying the guidance provided in MSC/Circ.1081 in machinery spaces of all ships:

1. One (1) EEBD in the engine control room, if located inside the machinery space;
2. One (1) EEBD in the machine shop or workshop area. If there is, however, a direct access to an escape way from the workshop, an EEBD is not required; and
3. One (1) EEBD located near the escape ladder used as second means of escape from the machinery space.

If the ship has a machinery space with more than one deck, then one (1) EEBD for each deck shall be placed at the same area as in point (.3).

#### 2. EEBDs for accommodation spaces on Cargo Ships

Liberian flag ships will be required to carry at least two EEBDs in the accommodation spaces. If the ship has a split house, then the minimum EEBD requirement for the accommodation spaces will be increased to 4 (two per house). After reviewing the vessel's layout and operations, the vessel's classification society may require additional EEBDs in the accommodation spaces in order to meet the intent of the regulations.

#### 3. EEBDs for accommodation spaces on Passenger Ships

Passenger ships shall comply with the requirements of SOLAS II-2 Reg. 13.3.4.3, 13.3.4.4 and 13.3.4.5 regarding the number of EEBDs to be carried in each main vertical zone. At least two EEBDs shall be carried in each main vertical zone. In passenger ships carrying more than 36 passengers, two additional EEBDs shall be carried in each main vertical zone. The EEBD storage location should be clearly marked and they should be easily accessible. The EEBDs for the accommodation spaces should not be stored in the emergency gear locker.

#### 4. EEBDs for Chemical Ships

In addition to the requirements stated above, ships carrying certain chemical cargoes under the provisions of the IBC Code may have to provide additional EEBDs in accordance with the requirements of IBC Code Chapter 14, Regulation 14.2.8.

#### 5. EEBDs for pump rooms and similar spaces

Taking into account the number of persons who may enter the pump room during normal operations, EEBDs should be made available for individual carriage for the maximum number of persons who may enter the pump room during such operations. These EEBDs are in addition to ones installed in the engineroom and the accommodation spaces. Ships may opt to install EEBDs in the pump room in lieu of providing additional EEBDs for individual carriage. If this option is chosen a minimum of two EEBDs should be installed in the pump room.

#### 6. Training Devices

At least one EEBD training devices shall be provided for training purposes. This device will be in addition to EEBDs required for the machinery and accommodation spaces. The training device should be clearly marked so that they cannot be confused with operational EEBDs. The training device should not be stowed in the same location as the operational EEBDs.

#### 7. Spares

Ships with ten or less EEBDs on board shall carry at least one spare devices. Ships with 11 to 20 EEBDs on board shall carry at least two spare devices. Ships with more than 20 EEBDs on board shall carry spares equal to at least 10% of the total EEBDs but no more than 4 spares will be required.

#### 8. Maintenance

Servicing and maintenance of EEBDs should be in accordance with the manufacturer's instructions. The ships periodic safety appliance and equipment inspection and testing procedures should be modified to incorporate the inspection of EEBDs. EEBDs, which have exceeded their service life as indicated by the manufacturer, should be discarded. Any unusable or damaged EEBDs should be promptly disposed of in accordance with manufacturer's instructions. Liberia does not require periodic hydrostatic testing for EEBD cylinders.

#### 9. Fire Control Plans

The location and the numbers of EEBDs shall be indicated in the ship's fire control plan. Revisions to the fire control plan should be endorsed by the attending class society surveyor after confirming the installation of the EEBDs

#### 10. Approval of EEBDs

EEBDs approved by or acceptable to the vessel's classification society are acceptable for use on the ship. This includes EEBDs that may have been approved by an authority authorized by another flag state if the vessel's classification society deems them acceptable.

Regards;

*Anthony Dupree Jr.*

Anthony Dupree, Jr  
VP-Technical and Communications-LISCR  
For the Deputy Commissioner of Maritime Affairs  
Republic of Liberia

