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CIRCULAR

Alert on Detainable Deficiencies

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Notice to: Ship Owners/ Managers/ Operators / Surveyors/ Auditors:

Following recent Port State Control (PSC) inspections, several deficiencies were recorded that resulted in the detention of the vessels. Dromon wishes to draw attention to the detainable deficiencies to avoid recurrence.

The detainable deficiencies:

SOLAS Chapter II-2: Construction – Fire protection, fire detection, and fire extinction.

1) **The fire detection system was found to be non-operational.**

   SOLAS Chapter II-2 Regulation 14.2 requires fire detection and fire alarm systems to be kept in good order to ensure their required performance if a fire occurs.

2) **The Fireman's Outfits and Self-Contained Breathing Apparatus were missing.**

   SOLAS Chapter II-2 Regulation 10 requires ships to carry at least two fire-fighter outfits. These outfits and the self-contained breathing apparatus must comply with the requirements of the Fire Safety Systems Code.

3) **The Fire Isolation Valve was stuck.**

   SOLAS Chapter II-2 Regulation 10.2.1.4.1 requires isolating valves to separate the section of the fire main within the machinery space containing the main fire pump or pumps from the rest of the fire main to be fitted in an easily accessible and tenable position outside the machinery spaces. The fire main is to be arranged so that when the isolating valves are shut, all the hydrants on the ship, except those in the machinery space, can be supplied with water by another fire pump or an emergency fire pump.

IACS Unified Interpretation states that any part of the fire main routed through a category A machinery space, except for short lengths of suction or discharge piping complying with SOLAS II-2/10.2.1.4.1, must be fitted with isolating valves outside of the space. The arrangements of the fire mains must allow for fire water from the fire pumps or emergency fire pump to reach all hydrants outside of the isolated space.

SOLAS Chapter II-1: Construction – Structure, subdivision and stability, machinery and electrical installations.

4) The Emergency Generator did not exist on the ship.

SOLAS Chapter II-1 Regulation 42 requires that a self-contained emergency source of electrical power is provided.

SOLAS Chapter III: Life-saving appliances and arrangements

5) Unable to operate steering system for lifeboat

SOLAS Chapter III Regulation 20-3.1 states that maintenance, testing, and inspections of life-saving appliances shall be carried out in a manner having due regard to ensuring the reliability of such appliances.

LSA Code 4.4.7.2 states that all lifeboats are to be provided with a rudder and tiller. When a wheel or other remote steering mechanism is also provided, the tiller shall be capable of controlling the rudder in case of failure of the steering mechanism. The rudder shall be permanently attached to the lifeboat. The tiller shall be permanently installed on, or linked to, the rudder stock; however, if the lifeboat has a remote steering mechanism, the tiller may be removable and securely stowed near the rudder stock. The rudder and tiller shall be so arranged as not to be damaged by the operation of the release mechanism or the propeller.

Revised guidelines for maintaining and inspecting fire protection systems and appliances can be found in MSC/Circ.1432, as amended by MSC.1/Circ.1516., and Dromon Technical Publication "Onboard Maintenance and Drills".

SOLAS Chapter V: Safety of Navigation

6) Radar inoperative

7) Echo-sounder inoperative

SOLAS Chapter V –Regulation 19.2.3 requires all ships of 300 gross tonnage and upwards and passenger ships irrespective of size to be fitted with:

- An echo-sounding device, or other electronic means, to measure and display the available depth of water;
- A 9 GHz radar, or other means to determine and display the range and bearing of radar transponders and other surface craft, obstructions, buoys, shorelines, and navigational marks to assist in navigation and collision avoidance.

SOLAS Chapter V –Regulation 19.2.7 requires all ships of 3000 gross tonnage and upwards to have a 3 GHz radar or where considered appropriate by the Administration a second 9 GHz radar, or other means to determine and display the range and bearing of other surface craft, obstructions, buoys, shorelines and navigational marks to assist in navigation and collision avoidance.

SOLAS Chapter V - Regulation 16 -Maintenance of equipment - states:

- The Administration shall be satisfied that adequate arrangements are in place to ensure that the performance of the equipment required by this chapter is maintained.

- Except as provided in regulations I/7(b)(ii), I/8 and I/9, while all reasonable steps shall be taken to maintain the equipment required by this chapter in efficient working order, malfunctions of that equipment shall not be considered as making the ship unseaworthy or as a reason for delaying the ship in ports where repair facilities are not readily available, provided suitable arrangements are made by the master to take the inoperative equipment or unavailable information into account in planning and executing a safe voyage to a port where repairs can take place.

Act now

Surveyors / Auditors should take note of the above detainable deficiencies and pay special attention during forthcoming class and statutory surveys and audits, irrespective of scope.

Shipowners / Managers / Operators are requested to pay special attention to those deficiencies, note the regulations' requirements, and ensure compliance with all Conventions and MSC Circulars.