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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 those deficiencies considered as 'grounds for detention' to avoid recurrence.

These detainable deficiencies, all of which contributed to detentions, were:

Structural Condition:

- During the inspection, areas were noted with unsafe electric installation, unsafe modifications, additional and non-approved fittings, broken cable lines etc.
- The port side forward rail was missing, and there were some bent parts on the ship's railing. The starboard side gangway was damaged and not properly maintained.

Water/Weathertight Condition

- The air vents on the main deck were found to be not properly maintained and were corroded.
- Means for securing the weather tightness of cargo hatch covers were not properly maintained. Cargo cleats were missing, some were not properly maintained. A roller base fitting and a bent/damaged metal securing end on the hatch cover corner were holed/corroded.
- Forecastle doors, emergency generator door, and accommodation entrance doors were found to be not properly maintained and not as required.
- External accommodation vents were cracked, holed and poorly maintained.
- Exit doors to open decks were not closed due to a malfunction of the locking system.

Emergency Systems

- The emergency fire pump was inoperative, and the main fire pump had weak pressure.
- During the blackout test, the emergency lighting in the engine room was insufficient. The liferaft emergency light was inoperative.
- The Captain was not familiar with the paint locker fire system.
- Emergency lighting illumination was insufficient, many lamps were inoperative, and some emergency lights were damaged.
- Several emergency lights throughout the vessel were found not properly maintained (broken covers, not properly marked, inoperative, not properly maintained electric wires, broken base fittings).
- Emergency lights on the open decks were not operational.
- The crew were not familiar with the abandon ship drill. During training, the starboard lifeboat was damaged and holed.
- The crew were unable to demonstrate the emergency diesel generator automatic start on failure of the main source of electrical power. There was an active alarm failure during the operation of the emergency generator, and there were residues from leakages on the deck.
- The emergency towing booklet was not divided as per the principles of the relevant regulation (forecastle etc.) and was not up to date.

Radio Communication

- Both VHF DSC sets on the bridge did not include the GPS position, and their handsets were not properly maintained.
- The GMDSS battery indicator showed the need for replacement.

Fire Safety

- The quick closing valves on all tanks were found not to close. The system could not be pressurised.
- A large quantity of paint was found in a locker not protected by the fixed fire system.
- The fire detection system was inoperative.
- Several fire doors were fixed in the open position with wires.
- Self-closing fire doors were found out of order.
- All fire doors were fastened with Hooks.
- Poop deck and steering gear room fire doors were found blocked.
- Fire doors in the steering room were found secured in the open position.
- Fire doors inside the accommodation and in the engine room were not properly maintained. Self-closing fire doors were fitted with hold-back hooks and some doors did not self-close properly. The handles of some doors were not properly maintained.
- Fuel bunker samples were found in the aft rope storage locker, which is not protected by the fixed fire system. The locker was filled with ropes, fuel samples and ER chemicals.
- It was not possible to inspect the CO_2 room because the deck was covered by approximately 20 cm of water.
- The fire detection and alarm panel on the bridge was inoperative.
- The ER main fire line had through spot corrosion.
- The ER FO tank's quick closing valve air bottle was found empty, and the airline was broken during topping up of the air bottle. The FO tank's quick closing system was not ready for use.
- The emergency fire pump was inoperative (no discharge pressure).
- Some fire hoses were holed and leaking heavily, and the fire hose nozzles were not operational for spray/jet. Some fire hydrants had minor leakages.
- The jacketed high-pressure leakage alarm was inoperative.

- Some fire detectors around the accommodation were blocked and not ready for use. During the inspection, there was a fire alarm due to a failure.
- Ventilation covers for cargo holds, forecastle, engine room, and accommodation spaces were corroded, not properly maintained and with missing securing devices.
- The fireman's outfit stowed in the forecastle was not properly maintained and did not meet the minimum standards for personal equipment and breathing apparatus. The two-way portable radiotelephone was not as required and was not ready for use.
- The monthly cards on the portable fire extinguishers were not properly filled and up-to-date. The main deck fire line was leaking and not properly maintained. It had numerous provisional sealing joints and corroded parts. Two fire hoses were holed, and a valve was leaking seawater into the ship's swimming pool. The fire line (Indicated as a sprinkler system) in the forecastle was not properly maintained and was damaged.
- The emergency fire pump generator battery was flat.
- The fire main was holed on deck.
- Machinery spaces' fire doors were not closed due to a malfunction of the locking system.
- The fire integrity between the bridge and stairway was damaged by electric cable penetrations.
- Shielding and insulation fitted to high-temperature surfaces on exhaust gas piping and turbocharger casings on both auxiliary engines was defective. Extensive areas of hot surfaces were not shielded, and the insulation material had deteriorated. Surfaces over 220 Deg C noted on two auxiliary engines in operation.
- No means of operational communication were observed during the fire drill.
- The fire main isolating valve was inoperative.
- The Fire Control plan showed two sets of International shore connections – only one found onboard.
- Two fire hoses in the E/R were more than 15 meters in length.

Alarms

- The bridge control panel emergency stop alarm indicator did not operate in test mode.

Safety of Navigation

- Several voyage publications had expired.
- The echo sounder was not indicating the depth.
- The BNWAS was inoperative.
- The BNWAS could not be operated as the password was unknown.
- The ship’s propeller was not fully submersed when manoeuvring alongside due to insufficient ballast. This was a violation of the Port Regulations.
- The bridge wing gyro repeater bodies were heavily corroded and damaged. The filling liquid was not visible.
- The ship’s horn only worked manually. The bridge wing horn buttons were inoperative.
- The emergency port navigation light was inoperative, and the starboard and stern emergency lights had no lamps.
- The pilot ladder was not properly maintained.
- The VDR was out of order – gave 'error' (switch off).
- The arc of visibility for NUC lights was not as per the COLREGS, the horizontal blind sector was greater than 6 degrees.
- The voyage plan for the intended voyage did not meet all criteria of the relevant regulations (general requirements, planning before each voyage, verification and display of planned route).
- ECDIS Charts were not up to date.
- The local chart was missing.
- The navigation charts for the last voyage were found to be missing / not updated.

- All the nautical publications were old editions.
- Nautical publications for the ship's intended voyage and trading area were found expired, and other publications were not up to date. The ITU lists had expired.
- The propeller was not fully submerged during maneuvering on arrival, in violation of local regulations.

Life-saving appliances

- The lifeboats were in poor condition due to a lack of maintenance. The lifeboat was holed during training.
- The lifeboat windows did not provide any visibility. The marking of the lifeboat was not as required.
- The Lifeboat Inventory was not as required by regulation. Some equipment was not available, and some was damaged and not properly maintained. Safety belts were not as required and were not properly maintained.
- The launching arrangement of the free-fall lifeboat was not as required, not properly maintained and not ready for use.
- On-board training manuals and on-board training aids were not easily understood by crew members and did not provide accurate information on the ship's LSA and FSA systems.
- The rescue boat was kept with the engine off the boat and would not start once connected to the rescue boat.
- The rescue boat davit was inoperative.
- The lifeboat remote control lines were not prepared for ready use.
- The lifeboat engine could not be started by battery.
- One liferaft had no hydrostatic release unit, and the hydrostatic release unit on the other liferaft was not installed properly.
- The lifeboat engine battery was flat.
- The MOB lifebuoys weighed less than 4kg.
- Key personnel were not aware of, and were unable to demonstrate, the correct operation of the launching of the liferaft by the davit.

ISM Code implementation

- Key crew members were not familiar with their duties:
  - they were not familiar with the operational control of emergency equipment,
  - they did not proceed per the onboard ISM emergency preparedness procedures and safety instructions, guidelines and regulations.
- The crew could not demonstrate operation of the MF/HF Radio installation on DC power.
- The fire drill failed. Some crew members were not following their duties. Firemen entered the affected area without opening the BA bottles.
- There was no record of testing of the fire detector over the main engine oil cooler.
- There was no record of testing of the quick closing valves.
- The passage plan had not been completed.
- Nautical charts for the intended voyage and the ship's trading area were not corrected up-to-date.
- The designated person responsible for ballast operations was not properly familiar with the BWTS operation and procedures to follow in case inoperational BWTS.

Certificates & Documentation – Crew

- All SEA’s on board were only in the English language while not all crew were able to read and understand that language. One SEA was not signed by both parties.
- The Chief Engineer's temporary flag endorsement had expired.

Certificates and Documentation - Ship

- General arrangement plans permanently exhibited for the guidance of the ship's officers were not kept up to date and were not in a language able to be understood by key crew members. They were not showing clearly for each deck:
  - the control stations,
  - the "A" class and "B" class divisions,
  - particulars of the fire detection and fire alarm systems, the sprinkler Installation, the fire-extinguishing appliances,
  - means of access to different compartments, decks, etc., and
  - the ventilating system including particulars of the fan control positions, the position of dampers and identification numbers of the ventilating fans serving each section.

Propulsion and Auxiliary Machinery

- The engine room bilge alarms were not working.
- All auxiliary engines had oil leakages, provisional repairs, and were not properly maintained. One auxiliary engine was not ready for use due to a cylinder liner crack.
- In alarm mode, the electric power fault indicator of the remote control propulsion system was activated.
- The auxiliary generator cooling water inlet valve spindle was damaged.
- The diesel generator high-pressure pump was inoperative.

Working and Living Conditions

- The main and auxiliary engines were leaking oil. All areas in the engine room were oily.
- The cleanliness of the engine room was insufficient. All bunker tanks, pumps and separators were heavily leaking fuel. The ME cylinder oil tank was leaking oil. Both air compressors were leaking oil. The diesel generators were leaking oil and fuel.

Pollution Prevention – MARPOL Annex I

- The 15 ppm bilge separator overboard valve piping was found out of position.

Pollution Prevention - MARPOL Annex IV

- The sewage treatment plant was inoperative, electrical power was switched off, the compressor was inoperative, and plastic hoses were not transparent.

Pollution Prevention - MARPOL Annex V

- Crew members had not followed the ship's garbage management plan. Mixed garbage was found stored around the vessel and outside dedicated storage areas.

Pollution Prevention - Ballast Water

- The Ballast Water Management System was out of order.
- The Ballast Water Treatment System (BWTS) was inoperational during the last ballasting operation, as per the BWTS electronic log records. The BWTS was switched to emergency mode. No appropriate records in the Ballast Water Record Book (BWRB).
- The ballast quantity declared on arrival differed substantially from the quantity recorded in the BWRB.
- The BWTS was malfunctioning, and the Flag Administration, RO, and Port Authorities had not been informed.

MLC, 2006 Conditions of employment

- Double book-keeping, which was part of a crew complaint, was confirmed during crew interviews. The crew were not paid properly.

MLC, 2006 Accommodation, recreational facilities, food and catering

- The common heating was not working. The crew were supplied with portable heaters in each cabin. Common spaces were not heated. By crew statements, the heating system broke down a year ago. Hot water was not constantly available.
- Most lights in the accommodation area were found not properly maintained (broken lights, missing lights, broken covers, broken base fittings, insufficient lighting, etc.).
- Most cabins did not meet the minimum criteria per the relevant provisions of the Standard.

Other

- The flag state was not informed of an accident which impaired the ship's seaworthiness.

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 / Codes and MSC / MEPC Circulars.