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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, 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

- The Battery Room deck was holed.
- Forepeak tank structural elements were corroded, holed and in poor condition.
- The mooring/anchor windlass was found damaged. The base foundation was cracked. The side drum was found with a damaged side collar - the drum was not able to rotate at all.

Water/Weathertight Condition

- A portable A/C hose was fitted through a porthole in the Master's cabin.
- The E/R and Cofferdam bulkhead was cut and holed.

Emergency Systems

- The muster station's lights were not working.
- When closed, the fire main isolation valve did not stop the flow of water.
- The emergency generator could not be started with battery no. 2.

Radio Communication

- There were no records of testing of the GMDSS for more than 1 month.
- There were no records of testing the SART.
- There were no records of testing the EPIRB.
- The MF/HF radio installation after initialisation indicated "VC error . Please power off".

- The GMDSS audible/visible alarm was missing when the emergency source was used.

Cargo Operations, including equipment

- The gas detector indicated ERROR O2.

Fire Safety

- The 'A' Class fire door on the bridge could not be closed properly.
- The fire doors' self-closing system was inoperative.
- A fire hose cabinet was found blocked with obstacles.
- The ECR emergency exit door was excessively corroded and damaged.
- Two fire extinguishers within the accommodation were empty.
- Fire doors of the Steering Flat, Poop Deck, Boat Deck, Bridge and machinery spaces were not closed all the way.
- There was no record of testing of the fire detectors over the main engine and in the galley. The alarm panel showed a fault for zone 2.
- The Fire line on the main deck was found holed.
- The emergency fire pump could not provide sufficient pressure.
- One fire hydrant valve was missing, and two fire hydrants were leaking.
- Some sprinkler system nozzles were found defective and not in position.
- Some fire hoses were holed. Fire hydrants on the forward deck were leaking.
- The crew were unable to operate the ER water mist system in Automatic mode.
- One fuel quick-closing valve could not be closed remotely.
- Several self-closing fire doors were found blocked in the open position. The self-closing fire doors for the AC room and ECR were found damaged, and it was not possible to close them.
- The engine room fire door did not close properly. The emergency exit fire door was tied back with a rope.
- Auxiliary Engines - all high-pressure fuel leakage collection drain pipes were found disconnected (not screwed in).
- The fire dampers/ventilators on the monkey island for the wheelhouse were found holed and excessively corroded on the collar. Several vents (deck C galley, deck A Emergency generator room, provision store vent) were found to be unable to close - turning the handle did not close the cover.
- The CO_2 pipe near cargo hold No. 4 was found damaged (holed).
- The quick-closing valves for the fuel outlet from the DO service tank to the Main Engine and Auxiliary Engines were found permanently tied in the open position and unable to be closed during operational test.
- The fire line on the upper deck was found severely rusted, holed, and leaking excessively during the operational test.
- Excessive oil accumulation was sighted in the engine room (auxiliary engines, main engine bilge, FO transfer pumps, purifier room).

Alarms

- There was a fault on the fire alarm control panel.
- The main engine level oil leakage alarm was inoperative.
- The E/R bilge alarm was inoperative.

Safety of Navigation

- The echo sounder was not working reliably. The readings were much more than the actual depth and kept changing.
- The ECDIS was inoperative.
- MARPOL Convention, LSA Code, some Sailing Directions are old editions (also noted at previous inspection).
- All nautical charts were not updated.
- Some voyage charts had not been updated.
- Some voyage charts had expired.
- Several voyage charts were missing.
- The voyage plan was missing.

- Some charts for the last and the intended voyages were missing. Navigation charts were not corrected up to date. There were no cumulative lists onboard.
- Most of the nautical publications had expired.
- The echo sounder did not indicate the depth, and there was no record of testing of the depth alarm.
- Nautical Publications for the arrival voyage were missing the List of Lights on both main and backup stations.
- Waypoints not marked on the nautical charts.
- The Bridge Navigational Watch Alarm System (BNWAS) operation was not in accordance with the installation survey report regarding audible alarms and function.
- The VDR was showing a malfunction. There were errors for several alarms, including no data input and a blown fuse.
- The chart catalogue was an old edition (20/22), the notices to mariners cumulative list, and some notices were not available, and not all notices were available on board.
- The sailing directions, list of lights, timetables, and the list for radio signals were not available due to internet failure. No backup onboard.
- Voyage plans were not always updated with the required information from the Company, drafts were not filled in, and passages were not always signed by the Officers in charge.

Life-saving Appliances

- The rescue boat engine was inoperative.
- The rescue boat was without thermal protective aids, the repair kit was not available, and the fire extinguisher pressure gauge was unreadable.
- The lifeboat window was dirty, with no visibility from inside the lifeboat.
- The rescue boat engine was not ready for use
- The MOBs had expired, and their foundations were poorly maintained.
- The lifeboat davits 5-yearly load-test certificate was not available.
- The lifeboat davit limit switch was inoperative.
- The stored mechanical power could not slew out the rescue boat davit.
- The rescue boat was found not ready for use. Fuel tanks were empty. The engine would not start.
- The rescue boat launching arrangement was not ready for emergency use.
- The rescue boat davit was inoperative.
- An emergency light was missing near the muster station area.
- Starboard side lifeboat engine could not be started on battery 2 set, initially also not able to start on battery 1 set- at the end of the inspection, the engine started only on battery 1 set.
- Exhaust gases were leaking heavily into the lifeboat, the steering was not operating in full range from hard to port- hard to starboard, and the magnetic compass was found with an excessive air bubble inside.

Certificates & Documentation - Ship Certificate

- The Cargo Ship Safety Radio Certificate did not correspond with the trading area indicated on the Minimum Safe Manning Document.
- Synopsis Records – some originals missing.
- The Ship's hull bottom survey exceeded 36 months.

Certificates & Documentation – Crew

- The number of persons carried onboard is more than allowed by Sec form E.
- The Master's application for endorsement of his GMDSS licence, and the Chief Engineer's application for endorsement of his licence had both expired.
- Officer flag endorsements were not available (the Flag Seafarers Verification system showed all endorsements as invalid).
- The Chief Officer & Chief Engineer were without Flag Endorsements.
- The rest/work hours weekly calculation was missing for every duty.

Certificates & Documentation – Documents

- The SEEMP Part III fuel oil consumption and carbon intensity rating certificate was missing.
- The SOPEP was missing.

Propulsion and auxiliary machinery

- There was no record of testing of the main engine OMD high concentration alarm.
- The emergency compressor and number 2 air compressor were inoperative.
- The auxiliary engine exhaust pipe was detached at the flange. Exhaust gas was entering the engine room space.
- There were fuel leakages on the auxiliary engine, from the high-pressure fuel pumps on cylinders.

ISM

- The onboard ISM SMS Manual was that of the previous company.
- The fire drill was not successful due to no fire alarm being sounded, no announcement, no mustering and using the wrong entrance to the area.
- The emergency steering gear drill was not successful due to a lack of communication between the bridge and the steering gear room.
- The abandon ship drill was not properly conducted; the required equipment and records were not brought to the lifeboat.
- The Fire drill in the emergency generator flat failed. Ventilation was not closed, duties were not followed, one fireman's mask was broken and could not be worn, and quick-closing valves were not operated. It took about 20 minutes to approach the fire.
- During the fire drill in the forecastle paint store, the crew's actions revealed a lack of training due to the perspective of the scenario implemented.
- The air cylinder of the fireman's outfit worn by a crew member during the fire drill was found empty. The fire alarm was not sounded before the drill.
- Records showed that the emergency drills scenarios were always the same, and the action times were always the same. The crew were not familiar with their duties.
- Enclosed space drills were not included in the schedule.
- There was no record of testing of the E/R CO2 release alarm, and the crew were not familiar with its operation.
- There was no record of testing of the main engine L.O. tank quick-closing valves.
- The officers and crew were not familiar with the ballast water management system.

ISPS

- All doors and windows were found open around the accommodation.

Pollution Prevention – MARPOL Annex I

- The Slop Tank, which is recorded as an oil residue tank on the IOPP, is used both for sludge and as a bilge tank. There is no separately designated bilge tank.
- Hydraulic oil line leakage in the way of cargo holds (also noted in previous inspection).
- The engine room bilge wells were filled with a fuel and oil mixture.

Pollution Prevention – MARPOL Annex IV

- Sewage retained on board 6.95 m^3 in holding tank with capacity of 7.51 m^3. - reported prearrival 0.1 m^3.
- Sewage treatment plant air blower No. 2 was missing, and air blower No. 1 was not delivering air.

Pollution Prevention - Ballast Water

- As per Logbooks and BWRB, the Ballast Water Treatment System (BWTS) by-passed, recorded as Ballast Water Exchange.
- The Ballast Water Management Plan had not been updated after the installation of the ballast water treatment system.
- The Ballast Water Management Plan was not approved either by the Flag Administration or the RO.
- The Ballast Water Management plan was not filled out properly and was not kept up to date. Crew training and familiarisation records were not available. The tank capacity plan in the Ballast Water Management Plan indicated 10 tanks; the vessel had 19 ballast tanks.
- The ballast water treatment system was inoperative.
- The ballast water treatment system was not operational during ballast and deballast operations. The system gave a bypass valve open warning, and the UV reactor was not operational.

- The Ballast Water Treatment System was showing a critical alarm fault for the last 10 days.

MLC, 2006 Conditions of employment

- A least 4 crew members had not received their monthly payments for at least two months. No records were presented to the PSCO regarding their payment in full.

MLC, 2006 Health protection, medical care, social security

- The crew were not wearing appropriate PPE. Gloves were not available.

Working and Living Conditions - Living conditions

- There were expired foods in the provision store. The quantity of provisions was insufficient for the forthcoming voyage.

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.