



clever solutions | beyond class

CIRCULAR Alert on detainable deficiencies

Following a recent Port State Control (PSC) inspection, four deficiencies have been imposed that resulted in the detention of the vessel. Dromon wishes to draw attention to these detainable deficiencies to avoid re-occurrence.

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

C18053 | 23 November 2018

DECKS - CORROSION

During the PSC inspection, it was noted that the vessel's *main deck forward of cargo hold coaming was found severely corroded and holed*.

This particular deficiency shows that three major issues are the main cause: the lack of planned maintenance properly followed by the crew on board, the lack of Crew Familiarization with SMS system and the lack of monitoring by the ISM Company.

Shipowners / Managers / Operators are kindly requested to pay special attention into such serious deficiencies.

CARGO & OTHER HATCHWAYS

On board the vessel, the main deck cargo holds, and other hatch covers & coamings were found corroded and in poor condition. More specifically, "*almost half of the securing cleats were missing, and the rest were found in poor condition*".

Failure to maintain hatch covers correctly can lead to physical loss of a cover in extreme weather and hold flooding and possible foundering. Minor leakage can cause cargo damage and, if over a prolonged period, damage to the ship's internal structure. Long-term structural decline can lead to structural collapse and total loss.

Shipowners / Managers / Operators should ensure that regular inspections of the hatch covers, beams and coamings should be carried out to identify general levels of corrosion, localized corrosion at welds, cracks in joints and weld metal, any permanent distortion of plating and stiffeners. If any cracks detected in main structural joints or local heavy buckling, then the Company should be informed. Special attention should be paid after heavy weather. Always rectify any steel to steel faults before renewal of rubber packing, else rubber packing will be ruined very shortly thereafter. Missing or damaged rubber packing's should be replaced immediately.

The cleats should be kept in good serviceable condition and correctly adjusted. Those and the wheels should be well greased. The hydraulic oil should be tested quarterly and correct oil levels should be ensured. Continuing and regular maintenance of hatch covers, and packing's is more effective and hence less expensive than sporadic inspection and major repairs.

The cleats should be never left unfastened prior proceeding to sea.



Another remark under this deficiency was that *“the ventilation head port side fwd was found destroyed during the inspection due to severe corrosion”*

The most probable cause of defective vent heads is the daily exposure to the outdoor environment on deck, occasional sprays from green seas and ballast water being pushed through the vent head during heavy rolling.

Malfunctioning air vent heads are a common finding, for the Port State Control inspector. Each vent head is an essential safety feature on board and should be kept in good condition. A broken air vent head will most probably result in a PSC deficiency which must be rectified before leaving port.

Shipowners / Managers / Operators should ensure that there is a regular inspection and maintenance programme in place for the air vent heads on board their vessels. Such programme should include the general condition (rust, dirt, functionality) and especially the condition of the float/ball/disc, guiding pin, seat and wire mesh (if installed). Needless to say, that a vent head replacement shall be of an approved type and any replacement parts shall be of the original or an equivalent quality. Also, a cheap air vent head can become an expensive experience. Air vent heads made out of aluminium or other grades of stainless steel have become increasingly popular in the last few years. Such materials are options to be considered in order to achieve a more maintenance-free vent head.



LIFEBOATS

The vessel's *lifeboats have not been found properly maintained since the lifeboat was found in very poor condition, the hooks severely damaged and it was not possible to release the boat in case of emergency.*

As already published through [C18024](#), DromonClass wishes to remind on the requirements on the lifeboats. Fall preventer devices in accordance with the guidelines for the fitting and use of fall preventer devices (FPDs), as per IMO MSC.1/Circ.1327, should be employed for each existing lifeboat release and retrieval system until the system is:

1. found compliant with the LSA Code; or
2. modified and found compliant with the LSA Code; or
3. found compliant with paragraphs 4.4.7.6.4 to 4.4.7.6.6 of the LSA Code and paragraphs 16 and 17 (overhaul examination) of the IMO MSC.1/Circ.1392; or
4. modified and found compliant with paragraphs 4.4.7.6.4 to 4.4.7.6.6 of the LSA Code and paragraphs 16 and 17 (overhaul examination) of the IMO MSC.1/Circ.1392; or
5. replaced by a new lifeboat release and retrieval system.

Replacement of lifeboat

Companies should, where possible, select replacement equipment acceptable to the lifeboat manufacturer. However, in cases where the lifeboat manufacturer is unable to offer a suitable replacement lifeboat release and retrieval system, the Company may select an alternative lifeboat release and retrieval system, with the agreement, if possible, of the lifeboat manufacturer. The replacement equipment should be approved by the Administration or DromonClass, under the provisions of the LSA Code.

Replacement of hook fixed structural connections of the release mechanism and supporting structure

As per IMO Circular MSC.1/Circ.1584, Dromon may allow hook fixed structural connections of the release mechanism and supporting structure which are not made of material resistant to corrosion in the marine environment, as required by paragraph 4.4.7.6.9 of the LSA Code, not be replaced if they are in a good condition and installed in a sheltered position inside the lifeboat. The assessment for verifying that fixed structural connections and supporting structures are in 'good condition' should be carried out by the manufacturer or by one of its representatives. The assessment for verification is not required if the materials of the foundation, bolts and supporting structure, both internally and externally, are made of materials resistant to corrosion in the marine environment.

STOWAGE AND PROVISION OF LIFEBOATS

The *lifeboat davit, winch, brake electric panel, sheaves and all structural members of launching arrangements have been found in very poor condition and severely corroded.*

SOLAS, Chapter III, Regulation 36 describes that instructions for on-board maintenance of life-saving appliances shall include the following for each appliance:

1. a checklist for use when carrying out the inspections required by regulation 20.7;
2. maintenance and repair instructions;
3. schedule of periodic maintenance;
4. diagram of lubrication points with the recommended lubricants;
5. list of replaceable parts;
6. list of sources of spare parts; and
7. log for records of inspections and maintenance.

Shipowners / Managers / Operators are requested to follow DromonClass [Publication](#) on the On-board maintenance and drills agenda to avoid overlapping a maintenance of such equipment and/or appliances.

Act now

Surveyors must take note on the above detainable deficiencies and give special attention during forthcoming class and statutory surveys, irrespective of scope.

Ship Owners/ Managers/ Operators are encouraged to inform Masters and take corrective actions if necessary. For further assistance please contact DBS Head Office at psc@dromon.com