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CIRCULAR Alert on detainable deficiencies

Following a recent Port State Control (PSC) inspection, a number of 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](#)

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BALLAST WATER MANAGEMENT PLAN

Following the PSC Inspection, it was noted that *the Ballast Water Management Plan was missing.*

According to BWM Convention, Regulation B-1, each ship needs to have on board and implement a Ballast Water Management Plan (BWMP). The BWMP provides guidance and assistance to the vessel's crew and operators in the effectual operation of the ballast water exchange system (BWMS). The accomplishment of this plan enables the vessel to prepare for the steps and proceedings required when conducting ballast water exchange.

The BWMP should be provided to Dromon Engineers for review and approval. All applicable documents to accompany the BWMP and shall assist its approval should be submitted to Dromon Head Office without undue delay in order to avoid any delays in the BWMP approval.

Owners/ Managers/ Operators should ensure that the ship's approved BWMP exist on board their vessels.

PAYMENT OF WAGES

The PSC report indicated that *the report of the payment of wages to the crew was not confirmed for some months.*

MLC, 2006, Standard A2.2 states that each member shall require that payments due to seafarers working on ships that fly its flag are made at no greater than monthly intervals and in accordance with any applicable collective agreement.

Non-payment of wages shows a substandard Shipping operation, therefore Shipowners should ensure that crew wages are paid on a regular monthly basis and the wages report is continuously updated.

AUXILIARY ENGINE

During the PSC Inspection, it was noted that *the auxiliary engine was inoperative.*

Shipowners / Managers / Operators should ensure that the engineers and the crew must carry out the appropriate maintenance in the engine room for safe and efficient operation. Each machine on board a ship requires maintenance which has to be carried out at regular intervals of time.

In order to carry out a successful maintenance plan, the ISM Managers should follow below steps that are considered essential:

1. Identifying the problem;
2. Establishing the clause;
3. Proposing solution;
4. Evaluating solution;
5. Implementing solution;
6. Evaluating effectiveness; and
7. Solving.

MANHOLES/ FLUSH SCUTTLES

Through the PSC Inspection *the main deck manhole covers of ballast and fuel tanks had a large number of missing nuts and studs. Manhole cover of ballast tank was holed.*

Ship Masters should follow the planned maintenance programme through which they should verify and confirm that the manholes, their nuts and studs and manhole ballast tank shall be in a good condition with no missing parts.

It is essential for the ISM Managers to implement the appropriate maintenance programme on board and ensure that the crew follows in detail same. No any actions or insufficient crew training and/or lack of maintenance can lead to deficiencies similar to this and possible detention of the vessels.

BULKHEAD - CORROSION

Another deficiency imposed was that *the superstructure bulkhead was corroded and the holes were closed with pieces of textile.*

In usual cases, excessive corrosion may be found in the following locations:

- At the mid-height and at the bottom of the bulkheads. The structure may look in deceptively good condition but in fact may be heavily corroded. The corrosion is created by the corrosive effect of cargo and environment, in particular when the structure is not coated;
- Bulkhead plating adjacent to the shell plating;
- Bulkhead trunks which form part of the venting, filling and discharging arrangements between the topside tanks and
- Bulkhead plating and weld connections to the lower/ upper stool shelf plates and inner bottom; and
- In way of weld connections to topside tanks and hopper tanks.

If coatings have broken down and there is evidence of corrosion, it is recommended that random thickness measurements be taken to establish the level of diminution. Where the terms and requirements of the survey dictate thickness measurement, or when the Surveyor deems necessary, it is important that the extent of the gauging be sufficient to determine the general condition of the structure.

When the reduction in thickness of plating and stiffeners has reached the diminution levels permitted by DBS, the wasted plating and stiffeners need to be cropped and renewed.

Shipowners / Managers / Operators are invited once more to pay special attention into such serious deficiencies.

DOORS

The PSC noted that *the door to accumulator room on boat deck, doors to superstructure both sides on main deck, door to carpenter's room were corroded through in low part. Also, the main deck laundry door was missing.*

According to LL, ANNEX I, Reg. 12 all access openings in bulkheads at ends of enclosed superstructures shall be fitted with doors of steel or other equivalent material, permanently and strongly attached to the bulkhead, and framed, stiffened and fitted so that the whole structure is of equivalent strength to the un-pierced bulkhead and weathertight when closed.

Maintenance hacks:

1. Inspections should be carried out by the crew to ensure that the indicated weekly, monthly, quarterly, annual, two-year, five- year and ten-year actions are taken for the specified equipment, if provided;
2. The self – closing mechanism of fire doors, if fitted, it is suggested to be tested and adjusted, as necessary, to ensure proper operation of the fire doors; and
3. Fire doors should be also regularly checked for any damage to the lock – mechanism, strike plate or their hinges and relevant arrangements to be made, so as to always close as appropriate.

Refer to DBS [Publication](#) for the complete maintenance programme.

VENTILATION

During the PSC Inspection, it was noted that *most of the inlet and outlet ventilations on main deck were highly corroded with structural damage and ventilations hatches didn't close tightly or couldn't open due to corrosion.*

The cause of defective ventilations hatches is the daily exposure to the outdoor environment. Each ventilation is an essential safety feature on board and should be kept in good condition.

Shipowners / Managers / Operators should ensure that there is a regular inspection and maintenance programme in place for the ventilations on board. Such programme should include the general condition (rust, dirt, functionality, painting, polish) and especially the condition of the float/ball/disc, guiding pin, seat and wire mesh (if installed).

Act now

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

Shipowners / Managers / Operators are kindly requested to pay special attention into those deficiencies, note the Regulations requirements and to inform Masters on taking corrective actions, if necessary.