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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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### FIRE DAMPERS

Through the PSC Inspection, it was noted that the *fire dampers have been found inoperative*.

Uncontrolled fire is always a serious risk. In an emergency a fire can spread via a ventilation ductwork. Therefore, it is essential that the ventilation ductwork is equipped with high-quality and robust fire dampers that also prevent smoke from spreading and therefore enable safety for escape routes.

Fire Dampers are used in air transfer openings, ducts and other places where fire rated structures are penetrated. If these openings wouldn't be protected, the fire would easily spread to other spaces and damage the property and pose a danger to people working in that environment.

SOLAS / Chapter 11-2 / Regulation 14.1 requires that:

- Fire protection systems and fire-fighting systems and appliances shall be maintained ready for use; and
- Fire protection systems and fire-fighting systems and appliances shall be properly tested and inspected.

IMO MSC.1/Circ1432 requires a test of all fire dampers for remote operation by the crew on an annual basis, therefore the Ship Master should make sure that this maintenance is assured.

### COVERS

The PSC report indicated that *Covers have been found to be not as required*.

As per the ship's ILLC Record of Conditions of Assignment the hatchway on main deck and sheltered deck were in position 1 and 2 and such covers should be weathertight and fitted with gasket and clamping devices as per ILLC Regulation 16. One cover was not provided with gaskets and another one was equipped with gasket. Weathertightness test failed for both covers.

Lack of weathertightness may be attributed to:

1. normal wear and tear of the hatch cover system: deformation of the hatch coaming or cover due to impact; wear of the friction pads where fitted; wear and tear of the cleating arrangement; or
2. lack of maintenance: corrosion of plating and stiffeners due to breakdown of coatings; lack of lubrication of moving parts; cleats, joint gaskets and rubber pads in need of replacement, or replaced with incorrect specification parts.

Testing of hatch cover weathertightness can be performed by different methods. The two most common leak detection tests are the water hose test and the ultrasonic test. Ultrasonic testing is the preferred method because areas of inadequate hatch sealing are accurately located.

Hatch covers and their fittings should be inspected at the end of every cargo voyage and all findings should be recorded. IMO Resolution MSC.169(79) lists a number of hatch cover items that should be inspected on each voyage cycle.

The continued safe operation is dependent on the Shipowner or Operator instituting a regular programme of inspections to confirm the state of the hatch covers in between surveys.

Routines shall be established to perform checks during the voyage, and inspections when the hatch covers are opened.

Voyage checks shall consist of an external examination of the closed hatch covers and securing arrangements in anticipation of, and after, heavy weather but in any event at least once a week, weather permitting. Particular attention shall be paid to the condition of hatch covers in the forward 25% of the ship's length, where sea loads are normally greatest.

The following items, where provided, shall be inspected for each hatch cover set when the hatch covers are opened or are otherwise accessible on each voyage cycle, but need not be inspected more frequently than once per month:

1. hatch cover panels, including side plates, and stiffener attachments of opened covers for visible corrosion, cracks or deformation;
2. sealing arrangements of perimeter and cross joints (gaskets, flexible seals on combination carriers, gasket lips, compression bars, drainage channels and non-return valves) for condition and permanent deformation;
3. clamping devices, retaining bars and cleating for wastage, adjustment, and condition of rubber components;
4. closed cover locating devices for distortion and attachment;
5. chain or wire rope pulleys;
6. guides;
7. guide rails and track wheels;
8. stoppers;
9. wires, chains, tensioners and gypsies;
10. hydraulic system, electrical safety devices and interlocks; and
11. end and inter-panel hinges, pins and stools where fitted.

As part of the inspection, the coamings with their plating, stiffeners and brackets shall be checked at each hatchway for visible corrosion, cracks and deformation, especially of the coaming tops and corners, adjacent deck plating and brackets.

## LAUNCHING ARRANGEMENTS FOR SURVIVAL CRAFTS

The PSCO noted that *the launching arrangements for the survival craft have been found not as required.*

Remotely located survival craft embarkation arrangements have been found not as required, lights to illuminate the launching areas are missed and knotted rope for liferaft embarkation is not allowed.

IMO MSC.1/Circ.1243 mentions that the area where these remotely located survival craft are stowed should be provided with:

1. a minimum number of two lifejackets and two immersion suits;
2. **adequate means of illumination** complying with SOLAS regulation III/16.7, either fixed or portable, **which should be capable of illuminating the liferaft stowage position, as well as the area of water into which the liferaft should be launched; portable lights, when used, should have brackets to permit their positioning on both sides of the vessel;**
3. an embarkation ladder or other means of embarkation enabling descent to the water in a controlled manner **(Controlled manner: a knotted rope is not acceptable for this purpose)** as per SOLAS regulation III/11.7; and
4. self-contained battery-powered lamps (i.e. luminaires) may be accepted as means of illumination for complying with SOLAS regulation III/16.7. Such lamps should be capable of being recharged from the ship's main and emergency source of electrical power, and should be stowed close to the liferaft and embarkation ladder they are intended to serve, under charge. When disconnected from the ship's power, the lamp should give a minimum duration of three hours of undiminished performance. The lamps should comply with the requirements of section 1.2.3 of the LSA Code. The lamps (i.e. luminaires) should meet the requirements of Ingress Protection rating IP 55. The batteries for the subject lamps should comply with IACS Unified Requirement (UR) E18 requirements irrespective of whether the expiry date is marked by the manufacturer or not.

With regard to the distance between the embarkation station and stowage location of the liferaft as required by SOLAS regulation III/31.1.4 (remotely located survival craft), the embarkation station should be so arranged that the requirements of regulation III/13.1.3 can be satisfied.

Exceptionally, the embarkation station and stowage position of the liferaft (remotely located survival craft) may be located on different decks provided that the liferaft can be launched from the stowage deck using the attached painter to relocate it to the embarkation ladder positioned on the other deck (traversing a stairway between different decks with the liferaft carried by crew members is not acceptable).

Where the exceptional cases mentioned above exist, the following provisions should be applied:

1. the lifejackets and the immersion suits required by paragraph 2.1 may be stowed at the embarkation station;
2. adequate means of illumination complying with paragraph 2.2 should also illuminate the liferaft stowage position, embarkation station and area of water where the liferaft is to be embarked;
3. the embarkation ladder or other means of embarkation as required by paragraph 2.3 may be stowed at the embarkation station; and
4. notwithstanding the requirements in paragraph 4.1.3.2 of the LSA Code, the painter should be long enough to reach the relevant embarkation station.

Following the above, we have updated our [Publication on Detainable Deficiencies](#) to include the above information.

### Act now

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