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CIRCULAR

Alert on detainable deficiencies

Following a recent Port State Control (PSC) inspection, several 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

C22006 | 26 January 2022

BEAMS, FRAMES, FLOORS CORROSION

During the PSC Inspection it was noted that *longitudinal and transversal beams, web frames on top side tank and bottom plate of the tank have been found heavily corroded, holed and/or broken.*

The marine environment, the humid atmosphere due to the water vapour from the cargo in cargo holds, and the high temperature on deck and hatch cover plating due to heating from the sun may result in accelerated corrosion of plating and stiffeners making the structure more vulnerable to exposure.

The root cause for such deficiencies is the combination of the marine environment and the difficulty to access the tanks for the protection and maintenance of the protective coating. If the protective coating is not properly maintained, the hull's structure may suffer severe localized corrosion. Transverse webs in the hopper tanks may suffer severe corrosion at their corners where high shearing stresses occur, especially where collar plate is not fitted to the slot of the longitudinal.

It is highly recommended that, as soon as any cracks are seen, **arrangements are made immediately to repair them.**

Where provided, the condition of the corrosion prevention system of ballast tanks is to be examined. For ballast tanks, excluding double bottom tanks, where a hard protective coating is found in **POOR** condition, and it is not renewed, where soft or semi-hard coating has been applied, or where a hard protective coating has not been applied from the time of construction, **the tanks in question are to be examined at annual intervals.**

In general, where part of the hold framing and/or associated end brackets have deteriorated to the permissible minimum thickness level, the normal practice **is to crop and renew the area affected**. However, if the remaining section of the frames/brackets marginally remain within the allowable limit, it is requested that affected frames and associated end brackets to **be renewed**. Alignment of end brackets with the structure inside hopper tank or topside tank is to be ensured and **repaired areas be coated**.

LAUNCHING ARRANGEMENTS FOR SURVIVAL CRAFT

During the PSC inspection it was found that *lifeboat launching operation failed due to not being maintained properly*.

The lifeboat launching operation failed because of the davit arms being seized in stowage position, a malfunctioning of the falls break and poor maintenance of the system.

SOLAS, Chapter III, Reg. 20 requires that before the ship leaves port and during the voyage, all life-saving appliances shall be in working order and ready for immediate use. Weekly maintenance need to occur by the crew, according to MSC.1/Circ.1206/Rev.1.

As for the maintenance, the instructions for on-board maintenance of life-saving appliances shall be easily understood, illustrated wherever possible, and, as appropriate, shall include the following for each appliance:

- a checklist for use when carrying out the monthly inspections;
- maintenance and repair instructions;
- schedule of periodic maintenance;
- diagram of lubrication points with the recommended lubricants;
- list of replaceable parts;
- list of sources of spare parts; and
- log for records of inspections and maintenance.

FIRE PREVENTION STRUCTURAL INTEGRITY

Another deficiency noted was that *the fire resistance of reefer machine room boundary was compromised by through passages and not fitted with proper means of closing*.

Ship firefighting and incident planning considerations should consider that any single compartment, multiple compartments or primary containment boundary should be assessed from all six sides of the cube where physically possible.

Electric cables which penetrate watertight 'A' Class divisions should only be passed through approved manufactured cable transits which have been approved for this purpose. Moreover, such penetrations should be located as high as practicable in order to reduce the risk of progressive flooding in the event of the compartment being breached.

Consideration should be given to the effects of sealing the compartment and monitoring the adjacent bulkheads/decks and deck heads.

The ISM Managers should:

- have policies and procedures for dealing with fires, where there is an anticipated risk;
- develop an intervention strategy appropriate to current situational awareness and predicted fire development;
- consider compartment boundary cooling, starvation or flooding as a strategy;
- manage the vessel's ventilation systems in conjunction with the vessel's personnel; and
- carry out an analytical risk assessment to support the decision to re-open sealed fire compartments.

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 and where necessary.