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CIRCULAR

Alert on Detainable Deficiencies

C24001 | 15 January 2024

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

Following recent Port State Control (PSC) inspections, several deficiencies were recorded that resulted in the detention of the vessels. Dromon wishes to draw attention to the detainable deficiencies to avoid recurrence.

The detainable deficiencies:

SOLAS Chapter 1: General Provisions:

- 1) Some longitudinal frames/beams in the hold were found damaged.

SOLAS Chapter 1, Regulation 11 states that the condition of the ship and its equipment shall be maintained to conform with the provisions of the present regulations to ensure that the ship in all respects will remain fit to proceed to sea without danger to the ship or persons on board.

SOLAS Chapter II-1: Construction – Subdivision and Stability, Machinery and Electrical Installations:

- 1) Oil leakage from Emergency Generator in Fo'c'sle.
- 2) Steering Gear found 'oily'.

SOLAS Chapter II-2: Construction – Fire protection, fire detection, and fire extinction:

- 1) The Fo'c'sle deck ventilation line was found cracked and damaged.
- 2) The Emergency Generator exhaust line was found holed and leaking.
- 3) During the PSC Inspection, the Generator Room fire detection and alarm system was found inoperative.
- 4) There was no record of testing of fire alarms.
- 5) The records of having carried out Fire Drills, Abandon Ship Drills, and Enclosed Space Drills had not been maintained up to date.

SOLAS Chapter II-2-Reg.14.2.2.1 requires maintenance, testing, and inspections to be carried out based on the guidelines developed by the Organization and in a manner having due regard to ensuring the reliability of fire-fighting systems and appliances.

Revised guidelines for maintaining and inspecting fire protection systems and appliances can be found in [MSC/Circ.1432](#), as amended by [MSC.1/Circ.1516](#)., and Dromon Technical Publication "[Onboard Maintenance and Drills](#)".

Annex to MSC.1 / Circ. 1432, paragraph 4 details the following tests for Fixed fire detection and alarm systems:

Weekly:

Verify all fire detection and fire alarm control panel indicators are functional by operating the lamp/indicator test switch.

Annually:

- Test all fire detection systems and fire detection systems used to automatically release fire-extinguishing systems for proper operation, as appropriate;
- Visually inspect all accessible detectors for evidence of tampering obstruction, etc., so that all detectors are inspected within one year; and
- Test emergency power supply switchover.

[SOLAS Chapter III: Lifesaving appliances and arrangements:](#)

- 1) The Rescue Boat winch motor was found inoperative.
- 2) The Rescue Boat Wire arrangements were found heavily rusted.
- 3) The Rescue Boat five-yearly test had not been performed.
- 4) Man overboard light / smoke unit expired.

SOLAS Chapter III, Regulation 17 requires the rescue boat's recovery time to be less than 5 minutes in moderate sea conditions when loaded with its full complement of persons and equipment.

SOLAS Chapter III, regulation 20 requires that falls used in launching shall be inspected periodically with special regard for areas passing through sheaves, and renewed when necessary due to deterioration of the falls or at intervals of not more than 5 years, whichever is the earlier.

[SOLAS Chapter IV: Radiocommunications](#)

- 1) Two-way VHF Emergency batteries were not fully charged.
- 2) EPIRB Hydrostatic release expired.

[SOLAS Chapter V: Safety of Navigation:](#)

- 1) The IAMSAR Manual Vol 3 was missing.
- 2) Charts not corrected up-to-date.

SOLAS Chapter V, Reg 27 states that nautical charts and nautical publications, such as sailing directions, lists of lights, notices to mariners, tide tables, and all other nautical publications necessary for the intended voyage, shall be adequate and up to date.

SOLAS Chapter IX: Management for the safe operation of ships

- 1) The Document of Compliance Certificate was found to have expired.

A copy of the Document of Compliance shall be kept on board the ship so that the Master can produce it on request for verification.

MARPOL Annex 1:

- 1) Oil leakage on M.E.
- 2) The SOPEP was not approved and the Annex was missing.

MARPOL, Annex 1, Regulation 37 states every oil tanker of 150 gross tonnage and above and every ship, other than an oil tanker, of 400 gross tonnage and above shall carry onboard a shipboard oil pollution emergency plan approved by the Administration.

The International Convention on Loadlines:

- 1) The main deck handrail was found cracked and damaged.
- 2) The sump tank line on the main deck was found holed.
- 3) The Freeboard Calculation missing.
- 4) The deck line marking missing from the Plimsoll Mark.

Act now

Surveyors / Auditors should take note of the above detainable deficiencies and give 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 and MSC Circulars.