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. URACOS wishes to draw attention to these detainable deficiencies to avoid re-occurrence.

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

URC20043 | 15 October 2021

FIRE DOORS/ OPENINGS IN FIRE-RESISTING DIVISIONS

Following the PSC Inspection, it was noted that *all self-closing fire doors on board were not closing properly.*

According to MSC.1/Circ.1432, the fire doors should follow the below maintenance programme:

- verify all fire door control panel indicators, if provided, are functional by operating the lamp/indicator switch (weekly);
- test all remotely controlled fire doors for proper release (annually).
- test all fire doors located in main vertical zone bulkheads for local operation (quarterly).

It is very important to note that:

- All fire doors must have proper closing mechanisms and must not purposely open; and
- All fire doors must not be tied back with “hooks”.

Drills agenda lists the maintenance programme that should be followed for the fire pumps according to MSC.1/Circ.1432.

FIRE CONTROL PLAN

The PSCO noted that *the fire control plan found on board not responding to the real situation. Fire-fighting equipment and lifesaving equipment for bridge were not stored according the fire plan. In the engine room a bulkhead dividing work shop was found. The emergency exit noted in tank top has not been reported on the fire plan*.

According to SOLAS Chapter II-2, Regulation 15.2, the fire control plans should be permanently exhibited for the guidance of the ship's officers and a duplicate set of fire control plans or a booklet containing such plans must be permanently stored

in a prominently marked weathertight enclosure outside the deckhouse for the assistance of shore-side fire-fighting personnel.

For the Graphical symbols for fire control plans, refer to IMO Res. A.952(23) and for the Guidance concerning the location of fire control plans for assistance of shoreside fire-fighting personnel refer to IMO MSC/Circ.451.

Ship Masters must ensure that the fire control plan is kept up-to-date and if any alterations shall be made onboard, these shall need to be recorded as soon as possible.

PERSONAL EQUIPMENT FOR FIRE SAFETY

During the PSC Inspection, it was noted that *fireman outfit locker not indicated on the fire plan. One set found in forecastle store without breathing apparatus.*

Following the previous deficiency, we remind Ship Masters to ensure that the fire control plan is kept up-to-date and if any alterations shall be made onboard, these shall need to be recorded immediate.

SOLAS Chapter II-2, Regulation 10.10.2.1 requires that ships shall carry at least two fire-fighter's outfits, which shall comply with the Fire Safety Systems Code and Self-contained compressed air breathing apparatus of fire-fighter's outfits shall need to comply with paragraph 2.1.2.2 of chapter 3 of the FSS Code[1].

In addition, the crew should carry monthly inspections to verify lockers providing storage for fire-fighting equipment contain their full inventory and equipment is in serviceable condition (MSC.1/Circ.1432).

STEERING GEAR

Through the PSC Inspection *oil leakages have been noted from steering gear.*

The crew should carry out steering gear tests within 12 hours before departure or weekly for ships which regularly engage on voyages of short duration (SOLAS V/26.1 & .2).

The tests shall include:

- the full movement of the rudder according to the required capabilities of the steering gear;
- a visual inspection for the steering gear and its connecting linkage; and
- the operation of the means of communication between the navigation bridge and steering gear compartment.

PSCOs have a strict policy of zero leakage from ship's steering gear, which is one of the most common problems on ships – a result of machinery systems having several moving parts operated by hydraulic oil. Some of the main areas of leakages are cylinder-ram seal in hydraulic ram type steering gear and seal in the chambers of a rotary vane pump.

Any kind of leakage from steering gear system must be rectified immediately.

EMERGENCY ESCAPE BREATHING DEVICE AND DISPOSITION

Another deficiency imposed was that the *EEBD has been found on tank top close to an emergency exit without any IMO indication and not in accordance with fire plan.*

The ship's Master should follow the requirements of Chapter II-2, Regulation 13.4.3, as stated below:

[1] Compressed air breathing apparatus shall be fitted with an audible alarm and a visual or other device which will alert the user before the volume of the air in the cylinder has been reduced to no less than 200 l.

1. On all ships, within the machinery spaces, emergency escape breathing devices shall be situated ready for use at easily visible places, which can be reached quickly and easily at any time in the event of fire. The location of emergency escape breathing devices shall take into account the layout of the machinery space and the number of persons normally working in the spaces[2];
2. The number and location of these devices shall be **indicated in the fire control plan**; and
3. Emergency escape breathing devices shall comply with the FSS Code.

It is vital to emphasize the importance of updating the Fire Control Plan on time and in continuation of its approval to be submitted to Dromon Engineers for re-approval.

Act now

Surveyors / Auditors / Inspectors 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.

[2] Refer to the Guidelines for the performance, location, use and care of emergency escape breathing devices (MSC/Circ.849).