Alert on Detainable Deficiencies

URC25009 | 20 February 2025

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. URACOS wishes to draw attention to those deficiencies considered as 'grounds for detention' to avoid recurrence.

These detainable deficiencies, all of which led to detentions, were:

Structural Condition:

- Stability calculations were not prepared from the Load Port.
- Stability calculations were carried out using an unapproved program.
- Ships of less than 80 m in length and a single cargo hold below the freeboard deck are required to be fitted with water-level detectors. The system was found out of order.
- Several parts of the main deck were corroded:
 - 1) Stairways in way of the mooring station in fore part in bad conditions, especially at the junction with the deck and and in some joints between the step and structure;
 - 2) Several parts of pipe/cable ducting on deck were found very corroded (i.e. support structure of hatch coaming).
 - 3) The platform at the end of the stairway in way of the mooring station in the fore part was found very corroded.
 - 4) The supports on the Monkey Island were very rusted.
 - 5) The MF/HF box on the Monkey Island was damaged and not watertight.
- Access ladders of Topside Ballast Tanks corroded and cracked at the upper junction with the deck.
- Through corrosion of the ship's hull. A hull inspection by a RO was required before departing the port.
- Ship's hull structural members (frames, longitudinals) broken, holed, loose, thinning, corroded, and deformed in side ballast tanks.
- Fore peak tank beams, floor and ordinary frame damaged and cracked.

- Holes in several areas on bulkhead openings to cargo holds, on the floor, and on brackets inside the fore peak tank. There is thinning wear and rust on the sheet metal, after discharging the present cargo on board, the vessel has to proceed to a shipyard for repairs.
- Ballast tank beams (between cargo holds) holed.

Water/Weathertight Condition

- The Engine Room skylight holed and decayed.
- Manholes/flush scuttles in way of cargo hold tunnel access found in poor condition with excessive rust.
- Cargo hold vents in a very bad condition.
- Hatch covers of cargo holds missing clamping devices. A survey by RO required.
- Doors at main deck not properly maintained / watertight.
- Several ballast tank manhole screws and nuts are missing.
- Hatchcover hydraulic pumps have oil leakages.

Emergency Systems

- During the abandon ship drill, when lowering down the port lifeboat, the main brake system did not work properly. The Lifeboat could not be lowered to sea level.
- Crew showed a lack of training and familiarity in the launching of the rescue boat.
- No emergency lighting on the poop deck, and the bridge deck emergency lighting was out of order. The crew carried out the abandon vessel drill without lights.
- During the emergency fire drill, the emergency fire pump was found leaking.
- The emergency fire pump was not ready for use.
- The emergency fire pump was found inoperative due to a low battery charge
- The emergency fire pump did not deliver any pressure during the test, and the priming unit was found stuck/ not functioning.
- During the last PSC Inspection, the emergency fire pump on board was not operational. The captain failed to notify the flag state as well as the relevant port authorities before the ship's arrival.
- The engine department personnel were not familiar with some emergency systems. The ship blacked out when testing the quick closing valves, and during testing of the Main Fire Pump, the crew members were not able to explain why the ship was supplied by emergency power.
- The emergency diesel generator was found inoperative.
- Emergency Generator could not be started.
- Emergency diesel generator inoperative during black-out simulation test (sequence test).
- The emergency generator system was not functioning properly due to the second battery not being charged and not connected.
- Public address system wings speakers not working.
- Quick closing valves inoperative in the engine room.

Radio Communication

- Vessel is not receiving navtex messages. It was not possible to read the last message due to faded letters on the paper.
- Deck officers were unable to demonstrate the proper function of the MF/HF equipment (no acknowledgement of test call recorded in GMDSS log).
- Both INMARSAT sets were found inoperative ("transceiver not connected).
- GMDSS battery found with "low volt" alert.
- The shore-based maintenance agreement required by the CSRC was missing.

Cargo Operations, including Equipment

- The atmosphere testing instrument had a faulty oxygen sensor.
- The crane operator's cabinet glass was broken.

- The cargo securing manual was missing.
- Gas detector calibration overdue.
- Gas detector indicated sensor O₂ fault and ZERO fault.

Fire Safety

- Engine Room Emergency escape exit door blocked.
- Several smoke detectors were not working properly. The engine workshop smoke detector was found covered with plastic (not ready for use), and one detector was found without the head.
- The fire line was found holed.
- Fire pump leaking.
- Fire pipe near main fire pump through corroded. Necessary survey by RO.
- Water was found leaking from the connection of fire hoses. This was a recurrent deficiency from the last PSC inspection, giving evidence of a lack of ISM implementation.
- The bridge deck fire line valve was found frozen and leaking.
- The fire main section valve was found broken due to heavy corrosion
- The fire alarm panel showed a faulty fire detection zone indication. Two fire sections were found disconnected.
- Several self-closing fire doors found with hold-back systems wooden chocks and ropes.
- The Fire Drill scenario, as discussed at the briefing, was not followed by the Crew.
- The fire drills reports were found to be copied/pasted on different dates. Same Information in terms of exact time and actions.
- Incomplete and incorrect fire-fighting equipment was used during the exercise, and the fire-fighting procedure was not properly followed:
 - o the fireman's VHF was not used;
 - o only one fireman participated in the drill);
 - the crew did not muster at the master station;
 - boundary cooling was not performed;
 - o closing of fire flaps and shut down of electricity was not performed;
 - o all crew entered the affected area without proper protection.
- The fire drill was performed unsatisfactorily:
 - Doors and ventilation were not closed;
 - Electricity supply was not isolated;
 - Comunication was insufficient;
 - The fireman entered into the galley, opening the door without the required prudence.
- Fire drill not performed satisfactorily due to:
 - o the firemen didn't carry two-way radiotelephone apparatuses;
 - o nobody checked the BA's pressure before the firemen entered the fire scenario
 - nobody brought additional SCBA close to the scenario;
 - one fireman didn't wear the BA correctly;
 - BA's pressure gauge remained inside the fireman's outfit therefore, it was impossible to read the BA's pressure:
 - belts for both firemen were not fastened;
 - o firemen entered into the scenario with BA bottles closed and, therefore, without fresh air in the mask;
 - no backdraft precautions have been taken;
 - no lifeline pull code has been established;
 - gloves have been worn wrongly.
- The Firemen's outfit helmet was completely deteriorated.
- Members of the fire team were not dressed to effectively fight fires. BA sets were not properly worn, air was leaking, radios could not be found, and items such as axes and torches were forgotten.
- Fire alarm panel found with an alarm showing FAULT.
- Fire Detection Panel (wrongly) indicated a fire in zone 2.
- Two faults on the bridge alarm panel of the smoke/heat detector system.
- Fuel alarm system not as required. The fuel alarm compartment was found open.
- The Chief Engineer was unfamiliar with the operation instructions for the CO₂ system.
- The Chief Engineer was not able to locate the safety/fire control plan.

- The colour and legends on the safety/fire control plan in the main deck corridor are seriously faded.
- Smoke detectors for the accommodation main deck and steering gear room were dismantled and inoperative.
- Cargo Hold Smoke Detection System found with an active fault. The fire alarm system remote box in the forecastle smashed and open. The smoke detector in the forecastle did not activate the alarm when tested. Manual call points in ECR and outside the ER workshop did not activate the fire alarm when tested.
- There is no equipment available to test the fixed fire extinguishing system detectors (heat and smoke).
- Fire nozzle missing in ER.
- One EEBD missing in the engine room (lower platform).
- The Stairwell main deck -door, as indicated on the fire control plan, is missing.
- ER ventilation holed and inoperative.
- Ventilation mushrooms of paint store and galley inoperative. Four closing plates of the ventilation system from the engine room were found to be removed.
- Manual operated fire damper or Stbd. ER, supply fan unable to close. Fire damper on portside ER supply fan wasted and holed by corrosion. EG room Jalousie-type fire damper flaps not completely closing.
- Two ventilators located in the engine room were stuck in an open position and were unable to be closed.
- Almost all butterfly nuts fitted in accommodation external doors (for escape & security purposes) were found stuck.
- The stairway self-closing fire door was blocked with hold-back ropes in the open position. The engine control room & steering gear room fire doors were not fully closed. One fire door lock mechanism was found inoperative.
- All LO-tank quick-closing valves and Emergency Diesel Generator fuel tank quick-closing valves were found stuck/not closing.
- Self-closing fire door In forecastle to hydraulic pump room not closing properly.
- Correct functioning of the ME quick closing valve could not be demonstrated.
- No record of testing of the quick closing v/v of the DO settling tank.
- The D.O. tank quick-closing valves and F.O. service tank were not functioning properly. The control air pipes were leaking.
- The valve of the fire line to the paint locker sprinkler system was broken.
- Quick close valves for the engine room FO and LO tanks were inoperative.
- One Engine room Fire Damper on the poop deck was unable to be closed due to a damaged hinge.
- All external high-pressure fuel delivery lines between the high-pressure fuel pump and fuel injectors for the Aux. Eng. were not protected by a jacketed piping system as required.

Alarms

- The Engine Control Room alarm panel was broken and repaired by tape. The main engine fuel oil leakage alarm did not sound in the CE's cabin. The ship is classed and manned as UMS.
- The Engine Room bilge level alarm was inoperative.
- No record of Oil mist alarm tests.
- The Fire Alarm was not audible in the Engine Room.
- The water ingress alarm was inoperative.

Safety of Navigation

- The BNWAS battery must be changed.
- Back-up station for nautical publications missing only one computer with installed licensed publications available.
- Nautical publication information was not included in the voyage plan.
- Sailing directions were missing. ITU List V was not the latest edition.
- No courses or positions were marked on voyage charts.
- The gyro compass was inoperative.
- The port chart was missing.
- A voyage chart was missing.
- Voyage charts were not updated

- Passage plans were not prepared for the last voyages.
- Charts for the intended voyage were not updated, a nautical chart was an old edition.
- Charts of the next and previous voyages were not updated in ECDIS.
- Nautical publications were not updated (Master declared they use electronic NPs).
- Nautical Publication were old editions.
- The voyage was performed with missing charts, over old charts editions, and without Nautical Publications. The only way of monitoring the passage plan was by ECDIS.
- The ECDIS back up was inoperative. The ECDIS turned off when cables below the screen were touched. The installation requires Class verification as cables, etc., are not correctly fed.
- S-VDR was found with an alarm, and the heading information was incorrect.
- S-band radar screen found defective with only partial display. The exemption granted by the Flag State had expired.
- Of the eight charts required for the previous voyage, two were missing, two were found uncorrected, and one was found not to be the latest edition.
- Stern navigation lights are out of requirements.
- The Aldis Lamp was not working on the ship's main electrical power.
- The telephone to the emergency steering position was inoperative.

Life-Saving Appliances

- The Rescue Boat Engine started only after several attempts.
- The Rescue Boat's Davit main brake was found not working.
- The lifeboat engine could not be started by battery.
- The Lifeboat disengagement hooks stuck due to rust, and it was not possible to release the Lifeboat.
- The Lifeboat was unmaintained and not lowered by the crew due to lack of training. On testing the launching system for the Rescue Boat, a massive oil leak developed from the hydraulic pump.
- The Rescue Boat motor cooling system was not working.
- Line-throwing devices were Inoperative, and the rockets expired.
- The embarkation ladder was completely broken and not working.
- The Liferaft in the fore part (6 persons) was surrounded by several materials (drums, ladder, cans, etc), not quickly ready for use in an emergency.
- The lifejacket's lights found expired.
- The emergency power for the Rescue Boat davit (nitrogen accumulator) pressure was below the minimum allowed (8MPa instead of 14 MPa).
- The Rescue Boat:
 - o cooling water suction valve impeller out of order (engine cooling not possible);
 - o It is not possible to recharge searchlight batteries from the ship's power supply from the rescue boat;
 - o propeller without guard for the safety of persons in the water and to avoid damage to the propulsion system by floating debris;
 - o buoyant lifeline becketed around the outside of the rescue boat almost completely broken;
 - manually controlled interior light missing;
 - o cap or plug to close the drain valve not attached to the rescue boat and its position not clearly indicated
 - binnacle wrongly mounted;
 - sea anchor missing;
 - waterproof electric torch suitable for morse signalling found not ready for use (without batteries).
- Retroreflective tape on the freefall lifeboat was missing, and the fire extinguisher pressure gauge was damaged.
- The weak line of the liferaft was not connected to the ship.
- Rocket parachute (12 pcs) expired.
- Line throwing apparatus rocket expired.
- The Lifeboat engine propeller shaft did not turn when the engine was running.
- The lifeboat's means of starting was not as required.
- Embarkation lights were not working.
- Absence of valid certificate and test for inflatable liferaft, with records containing data from another vessel.
- M.O.B. lifebuoys weight 2,5 kg.

• No record of LSA weekly and monthly checks

Certificates & Documentation - Ship Certificates

- SMC Certificate (short term) not as per ISM 2016 consolidated edition.
- ISSC (short term) is not as per ISPS 2005.
- DMLC part 1 was missing large parts of information in the lower parts of documentation. (e.g. article 2,5,8,11,13).
- The MSM certificate had expired.
- The Flag State is a party to the Nairobi Wreck Convention (NWRC). The Flag State certificate that attests that insurance or other financial security is in force per the provisions of this Convention was missing.
- The Flag State is a party to the Bunker Oil Pollution Damage (2001) convention. No certificate issued by the Flagstate could be shown.
- Document of compliance (DoC/ISM) missing.
- Cargo Ship Safety Construction Certificate (including exemption) missing.
- Tonnage certificate missing.
- The two installed generators had a major conversion on 27-08-2008. No EIAPP could be shown.
- Continuous Synopsis Records (CSR) items missing.
- Cargo Ship Safety Construction Certificate the last bottom section is not marked.
- The original Certificate of Insurance or other Financial Security in Respect of Civil Liability for Bunker Oil Pollution Damage was missing.
- The International Sewage Pollution Prevention Cert. was invalid.

Certificates & Documentation - Crew

- Flag State Endorsements for two officers (GMDSS) in charge of a navigational watch, as required by the minimum safe manning certificate, were missing.
- Required Engine Watch Rating found without Certificate of Proficiency.
- 2ND Eng. application/endorsement missing, and other officers' and engineers' endorsements could not be confirmed.

Certificates and Documentation

- The Shipboard oil pollution emergency plan (SOPEP) port contacts are not updated.
- Oil Record Book (Parts I & II) missing.
- Shipboard Oil Pollution Emergency Plan (SOPEP) missing.
- The MLC Complaint Procedure could not be demonstrated.
- The Ship's structural members' thickness and hatch coamings plate thickness did not meet that stated in the thickness measurement report. The report has to be renewed.
- The Certificate or documentary evidence of financial security relating to shipowners' liability (Standard A4.2.1 of the Maritime Labour Convention 2006 as Amended) had expired.
- The Certificate of financial security for repatriation (Standard A2.5.2 of the Maritime Labour Convention 2006, as Amended) had expired.

Propulsion and auxiliary machinery

- Ballast pumps, cooling pump ME and GS pump corroded and showing heavy signs of leakage. This deficiency is recurrent from a previous PSC inspection. The condition on board remains the same.
- The Main Engine had a major breakdown. The vessel is sailing with 7 out of 8 cylinders. It is unclear if Classification Society, Flag State and Service technicians have been informed/ordered despite several requests.
- Steering gear drill not successful due to lack of communication.
- Two of the diesel generators were inoperative.
- Insulation in various locations found wetted (purifiers, main engine. viscosimeter)

ISM

- Company not following the minimum safe manning requirements, no second engineer on board.
- The general air conditioning system onboard was defective.

Pollution prevention - MARPOL Annex I

- Oil filtering equipment was inoperative.
- A bilge tank was found with portable hoses and a pumping system, not per the diagrams.
- Several ballast tanks contaminated with fuel oil. The vessel needs a rectification plan.

Pollution Prevention - MARPOL Annex IV

Sewage treatment unit inoperative.

Pollution Prevention - MARPOL Annex V

- The ship's garbage record book records that Category A and C garbage were thrown overboard.
- Various placards were missing. This deficiency shows ineffective implementation of the ISM code in the areas where ISM-related deficiencies were found during a previous PSC inspection.

Pollution Prevention - MARPOL Annex VI

- The ship did not install fuel sampling points. The last IAPP certificate renewal survey was carried out in December 2023. Conditional IAPP with flag authorization.
- Evidence for CII classification was not found onboard.

Pollution Prevention - Ballast Water

- No ballast water treatment system (D2) on board.
- The ballast water treatment system was inoperative.
- The Ballast Water Record Book was not properly filled.
- the BWMS bypass valve alarm malfunctioned, and the flange connecting the UV unit and the inlet pipe was severely leaking. The BWMS is currently incapable of performing its intended functions properly and effectively.

MLC, 2006 Conditions of employment

Work/Rest hours records are missing.

MLC, 2006 Accommodation, recreational facilities, food and catering

- Insufficient provisions for crew. Total absence of vegetables.
- Cold room found in very poor conditions (food stowed without food containers, food on the floor). Drums under refrigerator devices indicate leaks from the systems. The freezer temperature was -8°C.
- Accommodation heating system not working (main boiler off) and portable heaters in cabins (a fire hazard).
- Living conditions are below standard. I.e., beds provided with substandard bedding, locker doors missing, ventilation dirty.

MLC, 2006 Health protection, medical care, social security

Some medicines expired.

Act now

Surveyors / Auditors should take note of the above detainable deficiencies and pay 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 / Codes and MSC / MEPC Circulars.

