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MARINE DEPARTMENT

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To: Shipowners / Ship Managers and Classification Societies

Dear Sir/Madam,

Updated Information for Port State Control Detentions of Hong Kong Registered Ships and Checklist for the Most Common Detainable Deficiencies

Please be informed that from 1 January to 31 July 2015, a total of 37 Hong Kong registered ships were detained following the port State control intervention. Amongst them, 17 ships were detained by AMSA in Australia and 5 ships were detained by USCG in USA.

With respect to the above-mentioned detentions, we would like to inform that the most common detainable deficiencies registered by the PSCOs are relating to fire damper, fire flap, fixed fire extinguishing system, emergency fire pump, lifeboat, rescue boat, emergency generator, back up batteries, air pipe, garbage and in some cases, all deficiencies were concluded by an ISM Code major non-conformity in respect of maintenance, key shipboard operations or emergency preparedness.

To avoid further detention of Hong Kong registered ships, a detailed checklist for the above most common detainable deficiencies has been developed by Marine Department (refer to Annex). The ship masters are urged to carry out inspection as guided to avoid detention due to these common detainable deficiencies prior to arriving any ports in particular to Australian and US ports.

The ship master and the management company should endeavor to rectify all deficiencies detected the soonest possible by taking prompt and appropriate corrective actions or make arrangement for temporary repairs. Should any potential problems or failure of any equipment or machinery that cannot be rectified before entering any ports, the ship master or the management company should promptly notify Marine Department, the local port authority and classification society, as appropriate, in advance to avoid possible detention.

Should you have any questions, please feel free to contact the Cargo Ships Safety Section as follows:

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Yours faithfully,

No signature on website copy

(P. K. Yeung)
Senior Surveyor of Ships/Cargo Ships Safety Section
for Director of Marine

Encl.

Annex

Checklist for the Most Common Detainable Deficiencies found on Hong Kong Registered Ships during PSC Inspections from 1 January to 31 July 2015

1. Fire Damper and Flap

Deficiencies

- a) engine room blower flaps not closing;
- b) fire dampers for four engine room fans unable to close effectively;
- c) starboard side forward engine room fire damper defective;
- d) engine room ventilation fan fire damper is inoperative, holed/wasted; and
- e) funnel flap is inoperative, holed/wasted.

Check Points

- a) ventilation flaps and dampers can move freely with all parts in place;
- b) dampers and flaps are structural sound with no edge wastage;
- c) louver type dampers are tested to ensure louver contact and function;
- d) no corrosion or wastage on the casings of ventilators for engine room, cargo holds, accommodation spaces and control stations, and their internal dampers are operating satisfactory;
- e) operating handles and stoppers are in good working condition, open/closed positions are properly marked, as well as which space the damper serves on the Fire and Safety Plan;
- f) crew are familiar with the operation of fire dampers and flaps, and their testing procedures are stated in the vessel's PMS and/or SMS;
- g) a responsible officer should be assigned for maintenance and inspection of fire dampers and flaps, testing of local and remote operation of fire dampers and flaps should also be carried out; and
- h) ship's specific training manual should include operation and testing procedures of fire dampers and flaps, and ventilating systems should be included in the regular fire drills.

2. Fixed Fire Extinguishing System

Deficiencies

- a) not enough pressure in the line of fire pump; and
- b) when the water-spray system for cooling, fire protection and crew protection was tested for failure, main line to starboard manifold was deteriorated approximately 5 feet to the pint pressure cannot be maintained to the entire system.

Check Points

- a) Shipyards often disconnect the fixed fire extinguishing system for safety reasons while there is ongoing work in the protected rooms. It is important that ship's crew ensure the system is operational as part of the pre-departure check;

- b) it should be verified especially after dry docking or repair that the vessel's fixed fire fighting systems are put properly back into operation. This check should be carried out after all testing and maintenance is completed. Examination of the individual lines and distribution piping system should be carried out, and if possible by blowing through, paying particular attention to their tightness. The actuator arms, valves, associated hardware and other piping connections for proper assembly and tightness should also be checked. Records should be maintained on board;
- c) control valves and release stations should be correctly labelled as to the spaces served by that section of the system;
- d) piping in lines are in good order without leakage or no heavy corrosion;
- e) regular inspection of pipes by air blow or water flow test;
- f) CO₂ cylinders are level checked or weight measured, no wastage on cylinders, and valid inspection certificates or service reports are maintained on board;
- g) testing of audible alarm for release of gas is carried out regularly; and
- h) water mist system are maintained in auto mode and water supply valves are kept open.

3. Emergency Fire Pump

Deficiencies

- a) emergency fire pump not operate;
- b) emergency fire pump not operating as required;
- c) emergency fire pump defective; and
- d) emergency fire pump failed to pressurize the fire main.

Check Points

- a) emergency fire pumps are maintained in proper working conditions and tested regularly to ensure:
 - i) priming pump effective and capable of taking sea suction;
 - ii) delivered and maintained the required line pressure;
 - iii) pressure gauge operational;
 - iv) the pump is free from any leakage and corrosion;
- b) operating instructions are posted up for easy reference;
- c) sufficient fuel oil is kept in the fuel oil tank for emergency fire pump diesel engines;
- d) crew are familiar with the operating procedures;
- e) no corrosion or wastage of fire lines; and
- f) no leakage of fire lines and fire hoses.

4. Lifeboat and Rescue Boat

Deficiencies

- a) ship staff unable to lower lifeboat;
- b) hull of the portside lifeboat had a crack;
- c) launching arrangements from port side lifeboat not properly maintained, forward sheave/hook not properly aligned with davit; locking pin from hydrostatic interlock at hook release system seized (port side); found cracks on cable protections from hook release system (port side), hook release system (starboard) adapted, instructions do not match with system;

- d) starboard lifeboat on-load release defective;
- e) vessel failed to report condition of the damaged rescue boat and leaking hydraulic piping as required by the Safety Management System;
- f) rescue boat davit defective, davit failed on 13/03/2015, no evidence that flag, class or port State have been informed of defect;
- g) during a test (rescue boat drill) the wire of the davit broke off (rotten down) when hoisting the rescue boat back to its position on board, as a result of the broken wire the rescue boat fell down into the water and the rescue boat is damaged;
- h) rescue boat outboard engine defective; and
- i) rescue boat remote control line not working, ship's crew unable to release hook to use rescue boat.

Check Points

- a) lifeboat and rescue boat structure (hull integrity, seats/thwarts, flooring, releasing hook connections to the boat, releasing gear, tiller/gudgeons) should be checked for proper maintenance with no wastage, rotten or damage;
- b) propulsion engine is in good working condition and operationally tested regularly
- c) lifeboat and rescue boat inventories or equipment are checked for proper quantity, expiration date and condition;
- d) lifeboat and rescue boat are lowered as per requirements and released from hooks to confirm satisfactory release mechanisms;
- e) launching appliances are checked to ensure good working condition and have it operationally tested;
- f) launching appliances are checked for wastage, proper hoisting/lowering and braking function;
- g) sheaves and loose gear are checked for worn out;
- h) wires and falls are serviced and changed out as necessary (at intervals not exceeding 5 years);
- i) limit switches and winches are tested;
- j) on-load release gear are operating normally and properly reset;
- k) on-load release gear are overhauled and tested under a load at intervals not exceeding 5 years by an approved service station;
- l) launching instructions in working languages are clearly posted up under emergency lights; and
- m) weekly and monthly inspections are carried out as per SOLAS regulations.

5. Emergency Generator

Deficiencies

- a) emergency generator does not automatically start and connect to emergency switchboard; and
- b) emergency generator fails to automatically connect to switchboard.

Check Points

- a) maintenance and testing program should include checking fluid levels, changing lubrication oil, coolant and fuel, and testing the automatic starting system, including primary (batteries) and secondary starting means;

- b) regular test run of the emergency generator will keep it working at optimum performance levels. Spare air, oil, and fuel filters should be readily available on board;
- c) regular generator maintenance and testing programs are implemented to avoid failure which is often attributed to excessive moisture in the generator windings. Heaters, if fitted, in helping to keep condensation moisture from developing should also be checked;
- d) emergency generator is started and run regularly, the engine should operate until its temperature has been stable for at least 10 minutes. That's when the engine parts become lubricated, oxidation is prevented, and overall functionality is verified; and
 - i) check to ensure the electric generator delivered the required voltage, acceptable insulation, and connected to the emergency switchboard as required;
 - ii) confirmation of fuel oil tank level;
 - iii) testing of fuel oil tank quick-closing valve, if fitted;
 - iv) crew are familiar with the operating procedures; and
 - v) operating instructions in working language are posted up for easy reference;

6. Back Up Batteries

Deficiencies

- a) reserve source of energy, DC24V batteries for GMDSS radio equipment defective.

Check Points

- a) batteries are inspected to make sure they are fully charged;
- b) battery cables and terminals are kept clean and free of corrosion. Where appropriate, check the specific gravity and electrolyte levels. All wirings should have tight connections and be free of corrosion or damage;
- c) batteries are tested under actual loading conditions, by direct connection to the protected equipment to confirm satisfactory operation; and
- d) Deck Officers are familiar with the change-over procedures from main source of energy to reserve source of energy (batteries) for GMDSS equipment.

7. Air Pipe and Natural Ventilator

Deficiencies

- a) Ballast tank air vents defective 11 nos. (4 nos. aft peak, water ballast tanks 6 nos. and fore peak 1 no.) and 6 nos. gasket detached.

Check Points

- a) Air pipes (or air vents) are properly maintained in good condition and checked internally and externally to ensure:
 - i) coamings and heads are in good condition without heavy corrosion or holes;
 - ii) floats inside air pipe heads are in good condition;
 - iii) no missing bolts of air pipe heads;
 - iv) wire gauzes or mesh are in good condition; and
- b) natural ventilators (e.g. gooseneck ventilators) are properly maintained in good condition:

- i) coamings and heads are in good condition without heavy corrosion or holes;
- ii) closing appliances are in good condition for weather-tightness; and
- iii) gaskets and clamping devices (i.e. bolts and nuts) are in order.

8. Accumulation of Garbage

Deficiencies

- a) accumulation of garbage in the aft station;
- b) garbage record entries are not being recorded in accordance with MARPOL Annex IV and unsegregated garbage are stored in area not authorized by the Garbage Management Plan;
- c) garbage storage was not in line with the Garbage Management Plan;
- d) large amount of garbage & oily rags stowed in engine room (on 3rd Deck); and
- e) large amount of garbage accumulated on poop deck in plastic bags.

Check Points

- a) all garbage should be retained onboard and disposed of using facilities in port;
- b) all ships are required to display signs or placards which provide information about the garbage laws. The placards should be visible in areas where garbage may be generated and in full view of the shipboard staff;
- c) all ships must have a Garbage Management Plan which contains procedures for collecting, storing, processing and disposal of garbage. The temporary storage of garbage should in no way causing any blockage of passages, leading to fire risks, or maybe blown over the ship side when windy;
- d) ships fitted with garbage handling equipment such as compactors or incinerators should be regularly checked by operational tests; and
- e) all ships need to maintain a garbage record book and enter details of every garbage incineration, disposal at sea or waste facility receipts in this record book. The record book must be kept onboard for a minimum of two years and be available for inspection by PSC Authorities.