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18 June 2012

To: *Shipowners / Ship Managers and Classification Societies*

Dear Sir/Madam,

Port State Control Inspections

We are pleased to inform you that Hong Kong has maintained the qualification for the United States Coast Guard's Quality Shipping for the 21st Century (QUALSHIP 21) Program for 2012. We would like to extend to you our sincere thanks for your great efforts to properly maintain Hong Kong registered ships and the invaluable support to us.

2. Although we could marginally enjoy QUALSHIP 21 status in 2011 and this year, in fact, we are on the worse edge and may possibly be removed from the list of QUALSHIP 21 in the next year unless we have great improvement on the PSC performance when Hong Kong registered ship visiting the US. Up-to-date, there have been four (4) vessels detained in USA in 2012. By reviewing the deficiencies found, it is observed that the detentions might easily be avoided if the ship's crew could carry out a thorough check using our PSC inspection Checklist before the ship entry of the ports.

3. Apart from the States, the statistics shows that the detention rate in Australia is relatively high. As such, this Circular Letter lists the detainable items and other deficiencies found by USCG and Australian Maritime Safety Authority (ASMA) in Annex I & II respectively for your particular attention.

4. I would like to further remind the company when their vessels are first time to entry or not a frequent caller to the US and Australian port that the checklist should be completed and return to this office in advance, therefore the shore supporting team of your company has enough time to arrange the repair work/service or seek professional advice. This checklist should also be used voluntarily as a preparation for other port entry to ensure the vessels continue to conform to the requirements/standards.

5. The Marine Department will continue to maintain high safety and marine pollution prevention standards of the Hong Kong registered ships and endeavor to

maintain the QUALSHIP 21 status. Good records of Hong Kong registered ships do not only upkeep the reputation of Hong Kong, but also reduce the target value in the PSC inspections. You are urged to review the common PSC deficiencies via our circular letters or PSC inspection information on our web-site (http://www.mardep.gov.hk/en/pub_services/rscs.html), and to request your fleet to well prepare, examine and test the PSC inspection items prior to entering any ports to avoid PSC detentions.

6. Should you have any questions related to PSC inspections for Hong Kong ships, please feel free to contact Senior Surveyor/ Cargo Ships Safety Section at

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Yours faithfully,



(S.H. Tse)

Senior Surveyor/Cargo Ships Safety Section
for Director of Marine

**Detainable Items and Other Deficiencies Found by
the United States Coast Guard (USCG)**

Def. No.	Deficiencies	Deficiency Action Code
(a)	No record of stevedore identification was being maintained - not complying with the Ship Security Plan/ISPS Code.	30
(b)	The ship security officer was unfamiliar with: i. the stevedore access control measures; ii. the requirements for conducting drills; iii. the plan audits and reviews; and iv. the training requirements in the ship security plan.	30
(c)	The master or crew are not familiar with essential shipboard procedures relating to the prevention of pollution by oil. The Engineering Department was not familiar with the operation of Oily Water Separator (OWS).	30
(d)	The OWS operations recorded on Oil Record Book (ORB) were not tallied with the bilge alarm's recording device. The entries to ORB were not proper.	30
(e)	The OWS onboard is inoperable due to a broken connection block on the coalesce high probe. In addition, the vessel's crew was unable to sustain operability of the OWS and or properly conduct testing of the OWS.	30
(f)	The SSO did not maintain communication and coordination with the person responsible for the security of the port facility and did not communicate the security situation to the Coast Guard after the security incident. The gangway watchstander did not verify the ID of the Coast Guard Port State Control examiners.	30
(g)	The declaration of security was not completed by the ship when a security incident has occurred until prompted by Coast Guard.	30
(h)	The SSO did not properly report the security incident.	30

(i)	After the security incident the port facility security officer was not contacted by the vessel and no coordination with the port facility occurred.	30
(j)	After the security incident the ship was not in compliance with the Code as the ship did not notify the appropriate competent authority prior to any interface. The vessel continued cargo operations without informing the facility, the CSO, or the port State for over two hours.	30
(k)	The following equipment was not on the rescue boat: i. one waterproof electric torch; ii. one whistle or equivalent sound signal; iii. a first aid outfit; iv. two buoyant rescue quoits; v. thermal protective aids; and vi. portable fire extinguishing equipment.	17
(l)	The bunker line transfer pipe has not been tested for leakage annually under static liquid pressure.	C
(m)	Ship could not provide calibration certificate for their oil filtering equipment.	17
(n)	Oily water mixture was transferred to pipe tunnel which is not a designed holding tank.	17
(o)	The valve from cargo hold No. 3 to ballast water system has failed.	17
(p)	The forward hatch on the port lifeboat does not seal and there are holes from missing bolts allowing for water ingress.	17
(q)	The vessel has a conflict between safety and security. The vessel has locked all the doors of the house leading to the outside decks. No keys to access the house from outside during an emergency have been provided. Also unaccounted for keys were found in engine control room and paint locker.	17
(r)	The forward mooring arrangements piping was found to be leaking hydraulic fluid.	17

(s)	The following deficiencies were found in the engine room: i. the port side No.3 heavy fuel oil tank steam heater piping has cracked welds and is leaking; ii. the bunkering line has numerous leaks on all of the flanges; and iii. the Auxiliary Generator Lube Oil storage tank is leaking oil from the sight-glass.	17
(t)	The rescue boat: i. forward limit switch sticks in the open position; ii. releasing control wire modification impedes the release of the boat during emergency operation; iii. releasing control wire sheaves are seized preventing wires to move freely, this causes the brake to pull up and disengage the winch.	17
(u)	The crew is using the incorrect tablets in the sewage systems. The tablets are crumbling and clogging the system.	40
(v)	The vessel is not following the garbage management plan. There is mixed garbage throughout the ship and they are burning metal and plastic in their incinerator.	40
(w)	Acetylene and oxygen bottles are not stowed for sea or secured in a rack.	10
(x)	The vessel crew was unable to prove proper testing of the OWS.	17
(y)	Upon testing the OWS, it was found that the coalesce high level oil probe has a broken connection block which causes the failure of the OWS.	17
(z)	The Chief Engineer was unfamiliar with the operation of the vessel's OWS.	17
(aa)	Due to the above objective evidence the PSCO questions the adequacy of the implementation of the vessel's Safety Management System under the ISM Code.	17
(ab)	Records of the security incident were not recorded in the ship's logs 16 hours after the incident and was still not recorded at the time of Coast Guard departure.	17

(ac)	Records of ship's security level change were not recorded in the ship's logs 16 hours after incident and was still not recorded at the time of Coast Guard departure.	17
(ad)	The ship shall monitor restricted areas to ensure that only authorized persons have access. Numerous areas marked as restricted were found unlocked. Including engine access and ballast control room from within accommodation space.	17

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**Detainable Items and Other Deficiencies Found by
Australian Maritime Safety Authority (AMSA)**

Def. No.	Deficiencies	Deficiency Action Code
(a)	Funnel fire flaps (Port) - unable to close.	30
(b)	Engine room fire main isolation valve not operational.	30
(c)	Vessel has utilised defective and improvised lashing equipment extensively in cargo securing.	30
(d)	Starboard lifeboat on-load release defective.	30
(e)	Free-fall lifeboat engine defective.	30
(f)	Deficiencies above are objective evidence the vessel's ISM SMS does not provide for emergency preparedness.	30
(g)	Deficiencies above are objective evidence the vessel's ISM SMS does not provide for maintenance of ship and equipment.	30
(h)	Oily Water Separator Auto stop device is defective.	30
(i)	ISM system does not ensure the maintenance of ship and equipment is carried out as required.	30
(j)	The SMS does not ensure effective maintenance of the ship and equipment in accordance with regulations as evidenced by deficiencies above.	30
(k)	The ship is loaded beyond the limits allowed by loadline certificate. Mid-ship loadlines submerged.	-
(l)	The vessel is unseaworthy due to non-approved temporary repair to a crack, main deck starboard side (Frame 100).	-

(m)	Oil Record Book Part I - obsolete version.	15
(n)	Stern Light - defective.	17
(o)	VHF aerial on monkey island - not secured.	17
(p)	Main deck and boat deck guard rails - pins missing for many gates, rails broken or distorted.	17
(q)	Several hatch drain non-return valves broken or missing.	17
(r)	Deck light on forward mast - detached.	17
(s)	Fire main - leaking dresser coupling on main deck (S).	17
(t)	Cabling for emergency light on starboard davit - not properly secured.	17
(u)	Hatch covers for access to cargo holds - many wing-nuts missing.	17
(v)	Cargo hold hatch cover cleats - some sockets for cleats defective IWO hatches 1 and 2.17	17
(w)	Line between lifebuoy and bridge wing smoke float - too short.	17
(x)	C/O and 3/O not adequately rested as per STCW for first and subsequent bridge watches. C/O 10/02/12 and 3/O 14/02/12. Additionally no hours of rest records onboard for 2/O for period 01/02/12 to 13/02.	17
(y)	Safety Management System (SMS) fails to ensure that bridge officers are fit for duty and that records are maintained of crew working hours as evidenced by deficiency above.	18
(z)	No bridge visibility calculation available for arrival Melbourne or departure Longbeach.	17
(aa)	Port and Starboard lifeboat have not been manouvered in last	15

	3 months.	
(ab)	Twist-locks in use onboard are not contained in vessels Cargo Securing Manual.	99
(ac)	Numerous oil tank gauges gagged open in ER.	17
(ad)	Main engine fuel pumps No. 2 and 3 fuel oil leak lines disconnected. No 2 diesel generator's No. 4 fuel pump fuel leak line missing.	17
(ae)	No 1 diesel generator fuel oil leak alarm bypassed.	17
(af)	EEBD marked No. 5 in engine room defective.	17
(ag)	EGC not configured correctly to receive Marine Safety Information.	17
(ah)	No records maintained for vessel's position during pilotage leg of voyage.	99
(ai)	Fire hoses in engine room (few) perished and leaking.	17
(aj)	Australian Sailing Directions Vol. 15 not corrected since 2009.	17
(ak)	Galley main ventilation damper not marked with open and close.	17
(al)	Main mast stay wire insulators broken.	15
(am)	Sat-C not setup to receive MSI for area of operation.	17
(an)	220V circuit installation monitor earth test function defective.	17
(ao)	Numerous fire nozzles missing in several locations around the ship.	17
(ap)	No. 1 and 2 auxiliary engines cooling system valves wheel handles missing.	15

(aq)	Engine room walkway plates (various) not secured- trip hazard.	17
(ar)	Boiler blow down valve insulation missing.	17
(as)	Emergency light inside funnel defective.	17
(at)	Rescue boat windscreen defective.	15
(au)	Forward liferaft embarkation ladder shackles seized.	17
(av)	Cargo hatch stoppers not in place at time of inspection.	17
(aw)	Windlass hydraulic room weather-tight door missing dogs.	17
(ax)	Fore peak valve handle missing from location.	17
(ay)	The SMS does not ensure that the vessel can effectively respond to emergency situations as evident by deficiencies above.	18
(az)	Port and starboard life boats, engine cover hinges defective.	17
(ba)	Starboard life boat on load release not correctly reset.	17
(bb)	Starboard life boat engine unable to start.	17
(bc)	Starboard life boat battery change over switch defective.	17
(bd)	Emergency generator not ready for immediate use.	17
(be)	Emergency generator secondary means of starting defective.	17
(bf)	Emergency steering position, gyro compass mounting unsecured.	17
(bg)	Cargo hatch covers No. 1 to 9, sealing rubber channel severe wastage	99

(bh)	Forward starboard mooring winch, hydraulic oil leak.	15
(bi)	Emergency switch board, insulation monitoring, earth test defective.	17
(bj)	No. 3 generator, cooling water pipes, temporary repair.	17
(bk)	Sewage treatment plant is defective.	17
(bl)	Free-fall lifeboat recovery limit switch, cable is missing, sheaves frozen.	17
(bm)	No manufacturer's instructions for simulated launching provided, but general instructions posted adjacent to boat.	16
(bn)	Access to boat is dangerous. Gap in excess of 400mm.	17
(bo)	Rescue boat crane sheave is frozen.	17
(bp)	Large scale charts not provided for previous and next voyage. AUS 757,758,759 and AUS 802,357.	17
(bq)	Mooring lines are tied up on drum ends instead of on the bollards.	17
(br)	Free-fall lifeboat quarterly manoeuvred in water on 30/1/2012 not recorded in official logbook.	17
(bs)	Last special survey executive hull summary not onboard.	16
(bt)	Deck cargoes not secured as per cargo securing manual.	17
(bu)	Navigation officers unable to verify deck cargoes not comprise bridge visibility requirements.	17
(bv)	Various cargo securing equipment not in accordance with cargo securing manual.	17
(bw)	Oily water separator 3-way valve function (open/close) not demonstrated.	17

(bx)	Pilot ladder steps fixtures many found loose.	17
(by)	Emergency fire pump not accessible without passing through engine room - escape hatch to aft deck chained from inside.	17
(bz)	Rescue boat hand pump discharge hose kinked and unable to insert pump operating handle.	17
(ca)	Searchlight missing from rescue boat.	17
(cb)	Rescue boat engine difficult to start and unable to hold in idle speed without stalling.	17
(cc)	Rescue boat engine starting cables & other electric connections in poor condition.	17
(cd)	Emergency fire pump priming device not adjusted for ready operation.	17

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