Ship Name: CMA CGM AMAZON
Flag: Liberia
IMO Number: 9706308
Date of Action: 1/17/2019
Action Taken: Detention
Port: Los Angeles, California
Unit: Sector Los Angeles-Long Beach

Deficiencies:

<table>
<thead>
<tr>
<th>Code - Category</th>
<th>Description</th>
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<td>015101 - Safety and environment policy</td>
<td>The company and the ship shall comply with the requirements of the International Safety Management Code. For the purpose of this regulation, the requirements of the Code shall be treated as mandatory. The company should ensure that the policy is implemented and maintained at all levels of the organization, both ship-base and shore-based. Objective evidence discovered during an expanded ISM exam revealed the following non-conformities: The crew failed to fully implement the requirements of the ISM code through their SMS procedures. These deficiencies are evidence that the ship and/or company are not complying with SMS requirements. Recommend external audit. Standard work practices which require enclosed/confined space entry permit dated 26NOV2018 for the purpose of cleaning an inspecting pipe duct for leaks are missing atmospheric testing, personnel logs, and continuous atmospheric monitoring. The safe working practice listed in chapter 7 of the Ship Operations Manual referenced by the ship's SMS manual identifies specific requirement for enclosed/confined space entry. PSCO identified tamper seal on the OWS sample cock drain valve was not installed as required by the ship's operating manual, chapter 6, section 1.5: &quot;A seal shall be used to secure in closed position the draining cock of the sampling line connected to the discharge line of the OWS. The number of the seal shall be recorded in the ORB under operation Code &quot;I&quot;.... When drain cock is required to be opened for maintenance and or sampling/draining purposes, a record of the opening of this cock is also to be made under Operation Letter Code &quot;I&quot;. For example; Draining cock of sampling line to OCM unsealed for maintenance / and or sampling or draining, whilst the overboard OWS sea valve kept closed.&quot; The ship operating manual is referenced by the ship's safety management system manual.</td>
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Recognized Org: Lloyd's Register of Shipping
Recognized Org (RO) Related: Not Class Relat
Recognized Security Organization (RSO):

Ship Management: Owners, Operators, or Managers
Capital Ship Management Corp.
Dias Container Carrier S.A.

Charterers:
CMA CGM Lines
The company and the ship shall comply with the requirements of the International Safety Management Code. For the purpose of this regulation, the requirements of the Code shall be treated as mandatory. The safety management system should include procedures ensuring that non-conformities, accidents, and hazardous situations are reported to the company, investigated and analyzed with the objective of improving safety and pollution prevention. Ship's Safety Management System manual, part 3, gives instructions for any non-conformance that affects the safety of the crew and environment.

Ship's defect report No. 137, dated 10JAN2018, indicates fuel oil leaking in the pipe duct. PSCO identified problem has continually persisted to present.

PSCO identified soft patch on HFO fuel transfer piping in forward engine room bilge. Chief Engineer was onboard for a period of 3 months. Cause for the soft patch was not reported.

PSCO discovered objective evidence of oily water being transferred to, stored in, and discharged overboard from the clean drain tank. Tank is not authorized for such use and was not reported to company, class, or flag administration.

In a ship in which oil fuel is used, the arrangements for the storage, distribution, and utilization of the oil fuel shall be such as to ensure the safety of the ship and person on board. PSCO witnessed excessive heavy fuel oil accumulation in the pipe duct beneath cargo hold No. 06. PSCO witnessed 10-12 inches of HGO pooling in areas of pipe duct caused by leaks from multiple couplings. Ship defect report No. 137 indicates this condition was caused by a leak of an undetermined amount occurring for an undetermined amount of time, but at least since 10 JAN2018, when report No. 137 was generated.

After any survey of the ship under paragraph 1 of this regulation has been completed, no change shall be made in the structure, equipment, systems fittings, arrangements or material covered by the survey, without the sanction of the Administrator, except the direct replacement of such equipment and fittings. Using a portable pump and associated hoses, ship's crew transferred to, and stored oily bilge water in, the clean drain tank through the tank top. The clean drain tank is not identified by the IOPP as an approved tank for the retention of oily bilge water.
Subject to the provision of regulation 4 of this Annex and paragraphs 2, 3, and 6 of this regulation, any discharge into the sea of oil or oily mixtures from ships shall be prohibited. The ship's crew discharged oily bilge water without processing through oil filtering equipment. Oily bilge water was transferred from various bilge sources through a portable pump and hose arrangement to the clean drain tank and then discharged overboard from the clean drain tank through the clean drain pump. Additionally, clean drain tank installed oil content meter was not operated properly. Sample drain line was plugged with a screw, impeding any sample fluid flow to oil content meter sampling equipment. Crew made statements as to pouring bottle water into sensor to ensure sensor had a reading of below set point to continually operate clean drain pump. PSCO witnessed oil residue present in clean drain pump strainer and discharge pipe spool piece after installed 3-way valve overboard.

The Oil Record Book Part 1 shall be completed on each occasion on a tank-to-tank basis if appropriate, whenever any of the following machinery space operations takes place in the ship: Discharge overboard or disposal otherwise of bilge water which has accumulate in machinery spaces. Crew did not record discharge of oily bilge water overboard from the clean drain tank through the clean drain pump in the Oil Record Book Part 1.

Subject to the provision of regulation 4 of this annex and paragraphs 2, 3, and 6 of this regulation, any discharge into the sea of oil or oily mixtures from ships shall be prohibited. During the operational test of the OWS, PSCO discovered objective evidence of tampering with the system, including a missing bolt form the outlet flange to the bilge holding tank of the 3-way simulation valve and identified missing seal to sampling cock drain valve, as required by ship’s operating procedures posted on OWS coalescer. During expanded MARPO examination, PSCO opened overboard discharge piping and discovered oily residue inside the piping.