Ship Name: **FLAGSHIP LOTUS**
Flag: **Marshall Islands**
IMO Number: **9321184**
Date of Action: **4/5/2019**
Action Taken: **Detention**
Port: **Houston, Texas**
Unit: **Sector Houston-Galveston**

**Ship Type:** Oil Tankship
**Recognized Org:** DNV GL MARITIME
**Recognized Security Organization (RSO):** Not Class Relat

**Deficiencies:**
- **Code - Category:** 14104 - Oil filtering equipment

**Description:**
Any ship of 10,000 gross tonnage and above shall be fitted with oil filtering equipment complying with paragraph 7 of this regulation [14.2]. Oil filtering equipment referred to in paragraph 2 of this regulation shall comply with paragraph 6 of this regulation [14.7]. Oil filtering equipment shall be such as will ensure that to any oily mixture discharged into the sea after passing through the system has an oil content not exceeding 15 ppm. [14.6]
PSCOs requested crew to demonstrate an operational test of the oily water separator (OWS). The second engineer ran the OWS in tank-to-tank mode for approximately 5 minutes. The Oil Content Meter (OCM) read 2 to 3 ppm for the entire time. PSCOs observed bilge water from bilge tank flowing through visual observation port on the test recirculation open on bilge overboard. Upon closer visual inspection, PSCO’s identified that the valve on the sample line to the OCM form the OWS discharge was closed, resulting in no flow though the OCM. When the crew opened the valve, OCM alarmed and the 3-way closed.
After more than 6 hours, crew was unable to demonstrate proper operation of OWS during the Tank-to Tank operational test; it remained in an alarm condition at all times.
In total, the observed conditions provide objective evidence that the OWS was operated in manner that did not ensure that any oily mixture discharged into the sea after passing through the system has an oil content of less than or equal to 15ppm.

**Ship Management:** Owners, Operators, or Managers
Prime Tanker Management Inc
Flagship Lotus, Inc

**Charterers:**
Equinor ASA
The oil Record Book (ORB) shall be in the form specified in Appendix II to this Annex [17.1]. The ORB Part 1 shall be completed on each occasion whenever any of the flowing machinery space operation take place on the ship: collection and disposal of oil residues (sludge); discharge over board to disposal otherwise of bilge water [17.2]. Each operation described in paragraph 2 of this regulation shall be fully recorded without delay in the ORB Part I, so that all entries in the book appropriate to that operation are completed [17.4]. The ORB Part I presented to the PSCO’s was factually inaccurate and does not correspond to actual tank levels found onboard during examination and the ship's daily sounding reports for the past month. During interview with PSCO’s, Chief Engineer stated that he believes the daily sounding logs are accurate.

For example, sounding taken in presence of PSCO’s indicated the following tank volumes: waste oil tank 15.7 cubic meters, No. 2 waste oil settling tank 0.9 cubic meters, waste oil service tank 1.1 cubic meters, bilge tank 22.5 cubic meters. According to entries in the ORB Part 1, on 31Mar19, the tank volumes were as follows: waste oil tank 13.9 cubic meters No. 2 waste oil settling tank 0.0 cubic meters, waste oil service tank 0.12 cubic meters, bilge tank 19.0 cubic meters. There are no more recent entries in the ORB Part 1.

Furthermore, the tank volumes recorded in the ORB Part 1 do not corresponding with eh daily sounding logs completed by the Fourth Engineer. For example, on 31MAR2019, the entries in the ORB Part 1 list the current quantity of the waste oil settling tank No. 2 and bilge water tank as 0.0 cubic meters and 19.0 cubic meters, respectively. The quantities listed in the 31MAR2019 soundings logs are 1.5 cubic meters and 22.4 cubic meters respectively.

There are no entries in the ORB Part 1 on 31MAR2019 or adjacent days showing transfers to or from these tanks. As second example, on 03MAR2019, the entries in the ORB Part 1 list the current quantity of the waste oil tank and bilge water tan as 8.2 cubic meters and 5.0 cubic meters, respectively. The quantity list in the 03MAR2019 soundings logs are 14.0 cubic meters and 15.1 cubic meters, respectively.

The purpose of this regulation is to prevent the ignition of combustible materials of flammable liquids [4.1]. 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 [4.2.2] PSCO’s observed pooled and standing duel oil in multiple locations in engine room, most notably on top the Heavy Fuel Oil service tank, waste oil settling tanks No. 1 and NO. 2, and waste oil service tank.