The company should ensure that the master is fully conversant with the company's safety management system [6.1.2]. The company should ensure that all personnel involved in the company's safety management system have an adequate understanding of relevant rules, regulations, codes and guidelines [6.4]. The company should establish procedures to ensure that the ship is maintained in conformity with the provisions of the relevant rules and regulations and with any additional requirements which may be established by the company [10.1]. In meeting these requirements, the company should ensure that: inspections are held at appropriate intervals [10.2.1]; any non-conformity is reported, with its possible cause, if known [10.2.2]; and appropriate corrective action is taken [10.2.3].

A set of pre-arrival tests and checks shall be performed not more than 1 day before arrival in port (or monthly if more than one calls per month) [Ship Operations-Cargo/CARG-030 page 1/6]. Pre-arrival checks are to be carried out as per ship specific checklist and, where necessary, as per terminal requirements. This includes, but is not limited to: readiness of the water spray system [Ship Operations-Cargo/CARG-001 page 2/4]. A set of pre-arrival tests and checks shall be performed not more than 1 day before arrival tests and checks shall be performed not more than 1 day before arrival in port (or monthly if more than one calls per month). At a minimum, the following equipment will be tested: emergency shutdown system and closing time of ESD valves (result to be recorded). [Ship Operations-Cargo/CARG-030 page 1/6].

As delineated in deficiencies 2-4, the company failed to ensure that the master was fully conversant with the SMS procedures. Additionally, the company failed to ensure that all personnel, involved in the company's SMS had an adequate understanding of the relevant rules regulations, codes, and guidelines. Lastly, the objective evidence provided in the proceeding deficiencies attests to the company failing to ensure that inspections of the relevant systems were tested at regular intervals, with any non-conformities being reported, and subsequent
An additional external verification of the vessels SMS, focusing on company procedures regarding resources, personnel, and maintenance of the ship is required.

Electrical installations should be such as to minimize the risk of fire and explosion from flammable products.

All of the electrical panels, light fixtures, and other electrical components inside the cargo compressor room, above and around all of the cargo tank domes were found improperly sealed. Specifically, the cable glands were missing or inadequate. As a result, the wires were loose enough to be pushed easily in and out of the fittings. Over 90% were found loose and sealed improperly with caulk. This is objective evidence that the electrical fixtures and/or enclosures are no longer in conformity with the standards of certified safe equipment.

On ships carrying flammable or toxic products or both, a water-spray system for cooling, fire prevention and crew protection should be installed to cover; exposed cargo tank domes and any exposed parts of cargo tanks; exposed on-deck storage vessels for flammable or toxic products; [and,] cargo liquid and vapors discharge and loading manifolds and the area of their control valves and any other areas where essential control valves are situated and which should be at least equal to the area of the drip trays provided.

During a test of the Deck Water Spray, less than 50% coverage was observed on the No. 1 and No. 2 tank tops and less than 10% was observed on the port side manifold. Five nozzles were missing from different locations of the deck water spray. Also, the flange at the termination of the port side manifolds water spray was loose and water was observed spraying out from the gasket of the flange. As a result, the deck water spray was not providing the required coverage area.

Emergency shutdown valves in liquid piping should fully close under all service conditions within 30 seconds of actuation. Information about the closing time of the valves and their operating characteristics should be available on board and the closing time should be verifiable and reproducible.

The emergency shutdown did not work the first time it was tested on the starboard manifold. On a subsequent test of the emergency shutdown on the starboard manifold, one valve did not shut and the other took more than two minutes to close. During the test of the port manifold ESD, one valve took over a minute to close.