

Ship Name: **AFRICAN BUZZARD**

Ship Type: **Bulk Carrier**

Flag: **Panama**

IMO Number: **9720225**

Date of Action: **8/17/2019**

Action Taken: **Detention**

Port: **Portland, Oregon**

Unit: **Sector Columbia River**

Recognized Org: **Nippon Kaiji Kyokai**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Not Class Related**

Relevant Certificates:

Organization Related  
to Detention:

Ship Management: Owners, Operators, or Managers  
**Kowa Marine Service Co. Ltd.**  
**Nissen Kaiun Co. Ltd**

Charterers  
**MUR Shipping B.V.**

Deficiencies: Code - Category

**15106 - Shipboard operations**

Description

The company should establish procedures, plans instructions, including checklists as appropriate. For key shipboard operations concerning the safe of personnel, ship and protection of the environment. The various task should be defined and assigned to qualified personnel. Objective evidence found during an expanded ISM exam revealed that the vessel's crew failed to follow the ship's SMS procedures with regard to fire-fighting procedures (SMS 10.1.1) and navigation safety (SMS Section 6). The crew failed two fire drills because they were not familiar with their duties, required fire-fighting equipment, and vessel fire-fighting procedures. Additionally, the crew failed to ensure that all ECDIS charts on board are corrected/up-to-date, in accordance with SMS procedures.

**15109 - Maintenance of the ship and equipment**

The company should ensure that inspections are held at appropriate intervals, any non-conformity is reported, appropriate corrective action is taken, and records of these activities are maintained. Objective evidence found during an expanded ISM exam revealed that the vessel's crew failed to follow the ship's SMS procedures with regard to inspections and maintenance of life saving appliances (monthly checklists) and standards for accommodation spaces (SMS Section 2.5.4). The Chief Officer (c/o) stated no inspections were being done on life craft embarkation ladders although he had been signing the monthly checklist that say they were completed. The corroded liferaft cradle and improper hydrostatic release installation on the starboard side liferaft was also not identified or reported on the monthly checklist. In regards to the crew accommodation spaces, long standing non-conformities consisting of inoperable showers and toilets were identified by both the c/o and Chief Engineer (C/E) during weekly accommodation space inspections but were not recorded properly in the inspection record, not reported to the Master or Company, nor correct.

**07125 - Evaluation of crew  
performance (fire drills)**

**A ship when in a port of another contracting government is subject to control by officers duly authorized by such Government concerning operational requirement in respect of the safety of the ships, when there are clear grounds for believing the master or crew are not familiar with essential shipboard procedures relating to the safety of ships. The vessel's crew failed two fire drills because they were not familiar with their duties, required fire-fighting equipment, and vessel fire-fighting procedures.**

Ship Name: **AGRI MARINA**

Ship Type: **Bulk Carrier**

Flag: **Panama**

IMO Number: **9442938**

Date of Action: **3/22/2019**

Action Taken: **Detention**

Port: **Portland, Oregon**

Unit: **MSU Portland (OR)**

Recognized Org: **Nippon Kaiji Kyokai**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Not Class Related**

Relevant Certificates:

Organization Related  
to Detention:

Ship Management: Owners, Operators, or Managers

**Bernhard Schulte-CHR**

**Hong Ji Tianjin Ship Leasing**

Charterers

**Hyundai Glovis Co., Ltd**

Deficiencies: Code - Category

**02199 - Other (Structural condition)**

**15109 - Maintenance of the ship and  
equipment**

Description

The machinery, boilers and other pressure vessels, associated piping systems and fittings shall be of a design and construction adequate for the service for which they are intended. Piping on the vessel's salt water cooling system has approximately 10 leaks with temporary repairs made by the crew without approval of the vessel's classification society.

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. Objective evidence during an expanded ISM exam revealed the crew was not following the ship's procedures with regard to testing steering gear alarms. In addition, the crew failed to notify the ship's technical superintendent with regard to the temporary repairs on the salt water cooling piping and hydraulic leaks on the steering gear. In accordance with the ship's SMS, the technical superintendent shall be notified when machinery defects cannot be rectified. It is recommended that an external third party audit of the SMS be conducted with regard to deficiencies No. 1 and No. 3.

Ship Name: **ALAM SETIA**

Ship Type: **Bulk Carrier**

Flag: **Singapore**

IMO Number: **9674804**

Date of Action: **8/6/2019**

Action Taken: **Detention**

Port: **Portland, Oregon**

Unit: **Sector Columbia River**

Recognized Org: **Nippon Kaiji Kyokai**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Not Class Related**

Relevant Certificates:

Organization Related  
to Detention:

Ship Management: Owners, Operators, or Managers  
**Bright Star Shipmanagement Inc**  
**Grace Ocean Pte Ltd**  
Charterers  
**Metall Und Rohstoff (MUR)**

Deficiencies: Code - Category

**11124 - Embarkation arrangement  
survival craft**

**15109 - Maintenance of the ship and  
equipment**

Description

An embarkation ladder complying with the requirements of paragraph 6.1.6 of the code extending in a single length from the deck to the waterline in the lightest seagoing condition under all conditions of trim up to 10 degrees and a list of up to 20 degrees either way shall be provided at each embarkation stations for survival craft launched down the side of the ship. Port side embarkation ladder was found deteriorated and parted, thereby unusable if critical abandonment emergency at sea.

In meeting the requirements, the company should ensure that inspections are held at appropriate intervals and records of these activities are maintained. Objective evidence during an expanded ISM exam revealed that the crew was not accurately following the ship's procedures with regard to the inspection and testing of the embarkation and pilot ladders in accordance with BS-MN-09-4 and BS-MN-07-06. In addition, the vessel failed to conduct or document required strength test every 30 months according to manufacturer's specifications.

Ship Name: **ALPINE DUKE**  
Ship Type: **Chemical Tankship**  
Flag: **Marshall Islands**  
IMO Number: **9470909**  
Date of Action: **4/18/2019**  
Action Taken: **Detention**  
Port: **New Haven, Connecticut**  
Unit: **Sector Long Island Sound**

Recognized Org: **Lloyd's Register**  
Recognized Security Organization (RSO):  
Recognized Org (RO) Related: **Class Related**  
Relevant Certificates: **Safety Equipment**  
Organization Related to Detention: **Lloyd's Register**  
Ship Management: Owners, Operators, or Managers  
**Oxygen Maritime MGT Inc**  
**Blizzard Navigation Inc**  
Charterers  
**ST Shipping and Transport Pte, Ltd**

Deficiencies: Code - Category  
**11101 - Lifeboats**

**11101 - Lifeboats**

Description  
**Before the ship leaves port and at all times during the voyage, all lifesaving appliances shall be in working order and ready for immediate use. During abandon ship drill, port lifeboat was lowered to deck B. Port state Control Officers identified frayed and broke (16mm 19x7) wire on the forward most fall.**  
**Before the ship leaves port and at all times during the voyage, all lifesaving appliances shall be in working order and ready for immediate use. After the wire rope failure on port lifeboat fall was discovered, Port State Control Officers had the starboard lifeboat lowered t deck B. Upon returning the lifeboat to cradle position, the winch-brake remote-release cable parted.**



Ship Name: **ALTAGRACE**

Ship Type: **General Dry Cargo Ship**

Flag: **Saint Vincent and the Grenadines**

IMO Number: **7710264**

Date of Action: **4/24/2019**

Action Taken: **Detention**

Port: **Miami, Florida**

Unit: **Sector Miami**

Recognized Org: **Not Classed**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Not Class Related**

Relevant Certificates:

Organization Related  
to Detention:

Ship Management: Owners, Operators, or Managers  
**Grace Holding International S.A.**  
**GIA International LTD S.A.**

Deficiencies: Code - Category

**15101 - Safety and environment  
policy**

Description

**Objective evidence discovered during an expanded ISM exam revealed the following non-conformities: The vessel failed to fully implement the requirements of the ISM code through their SMS procedures as evident by the following deficiencies indicating that the ship and/or company are not meeting the SMS requirements. Recommend an external audit.**

**01 - The company should ensure that all personnel involved in the company's safety management system have an adequate understanding of relevant rules, regulations, and codes. The Chief Officer has little knowledge of applicable rules and regulations. Garbage Record Book was incorrectly maintained, with entries completed during his time onboard failing to capture the total amount of trash disposed of while in port. Receipts provided confirmed an approximate 33% discrepancy between what garbage was offloaded and what was being logged. While in Haiti in January 2019, the GRB recorded 6.7m3 offloaded to the shore facility, the receipt recorded 10m3. ISM Code Part A/6.4**

**02 - The Company should establish procedures to ensure that the ship is maintained in conformity with the provisions of relevant rules and regulations. In meeting those requirements the company should ensure that any non-conformity is reported and the appropriate corrective actions are taken. The vessel provided completed checklists indicating satisfactory checks for the rescue boat and all equipment, however; the rescue boat was unable to be run in idle position. An oar was dry rotted and in poor condition. The rescue boat equipment box was missing sponges, dewatering pump, and searchlights. Various undated monthly completed checklist signed by the C/O that stated the equipment was provided and in working order. Zero NCRs /CARs were created for damaged/missing equipment. ISM Code Part A/10.1**

**03- The Company should establish procedures to ensure that the ship is maintained in conformity with the provisions of relevant rules and regulations. In meeting those requirements the company should ensure that any non-conformity is reported and the appropriate corrective actions are taken. Quick closing valve to**

	<p>generator fuel tank was wire tied open. Chief Engineer stated that while underway the valve would close and the valve was wired-tied open to prevent unintended closure. No non-conformity report of the faulty valve could be produced. ISM Code Part A/10.1</p> <p>04 - The company should establish procedures to ensure that new personnel and personnel transferred to new assignments related to safety and protection of the environment are given proper familiarization with their duties. The Chief Officer was not familiarized with the Garbage Management Plan and had not signed the plan stating that he had reviewed the plan and its requirements. ISM Code Part A/6.3</p>
07108 - Ready availability of fire fighting equipment	<p>Fire extinguishing appliances shall be kept in good order and ready for immediate use. PSCO's observed that the emergency fire pump was unable to be started until it had been disassembled and sprayed with an aerosol starting spray taking approximately 10 minutes for an initial start. Once started, the prime mover for the pump had an exhaust leak which filled the below deck space with hazardous atmosphere.</p>
07114 - Remote Means of control (opening,pumps,ventila	<p>Every fuel oil suction pipe from daily service tanks shall be fitted with a cock or valve capable of being closed from the outside of the space. Quick closing valve for the generator fuel tank in the steering gear space was wire tied open and unable to be closed remotely. Chief Engineer stated that while underway they tied the valve open to prevent closure.</p>
01315 - Oil record book	<p>The Oil Record Book Part 1 shall be completed on each occasion whenever any of the machinery space operation in 17.2 takes place on a ship. PSCO observed incomplete entries to ORB in regards to the disposal of sludge on 14DEC18. In addition, the ORB has a gap of entries from 14DEC18 to 16MAR19. During which time sludge capacity increase 0.80m3 indicating the vessel remained in operation. The discrepant entries were made prior to the current Chief Engineer working on the vessel.</p>
14604 - Bunker delivery notes	<p>The bunker delivery note shall be kept onboard the ship in such a place as to be readily accessible for inspection. The Chief Engineer was unable to produce bunker delivery notes for transfers conducted after September 2018. Instead, a statement of fact was provided for the most recent transfer conducted 31MAR19, which did not contain the required information for sulfur content and fuel quality onboard the vessel.</p>





Ship Name: **AMPARO PAOLA**

Ship Type: **Bulk Carrier**

Flag: **Mexico**

IMO Number: **8203634**

Date of Action: **7/19/2019**

Action Taken: **Detention**

Port: **Houston, Texas**

Unit: **Sector Houston-Galveston**

Recognized Org: **American Bureau of Shipping**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Not Class Related**

Relevant Certificates: **IOPP**

**Safety Management Certificate**

Organization Related  
to Detention: **Govt of Listed Flag**

Ship Management: Owners, Operators, or Managers  
**Cemex International , S.A. De C.V.**

Deficiencies: Code - Category

**14121 - Suspected of discharge  
violation**

**14121 - Suspected of discharge  
violation**

Description

Oil filtering equipment referred to in paragraph 1 of this regulation shall be of a design approved by the administration and shall be such as will ensure that any oil mixture discharged into the sea after passing through the system has an oil content not exceeding 15 ppm. In considering the design of such equipment, the administration shall have regard to the specification recommended by the organization. Vessel is fitted with a MEPC A.393X OWS and MEPC 107(49) OCM. Crew is unable to process bilge water to less than 15ppm. Multiple functional issues were noted during 5 hours of testing. 1) The sample line from the discharge piping of the OWS was clogged and did not provide a sample to the OCM, allowing for unmonitored bilge water to be discharged to overboard valve, when the sample line was cleared, the OCM read "EE" proving that the OWS is not processing bilge water. 2) The MEPC 107(49) OCM does not match oil record book entries. Most notably, the last recorded operation on 16MAY19 from 1900-2300 is not in the OCM history. 3) When the OCM alarmed over 15 ppm, the 3-way valve did not redirect to the bilge tank and allowed water to be delivered to the overboard valve.

The oil record book, whether part of the ship's official logbook or otherwise, shall be in the form specified in appendix III to this Annex (MARPOL 17.1). Additionally, the ORB Part I shall be completed on each occasion, on a tank to tank basis if appropriate, whenever any of the following machinery space operations take place in the ship: discharge of dirty ballast or cleaning water from oil fuel tanks, collection and disposal of oil residues, discharge overboard or disposal otherwise of bilge water which has accumulated in machinery spaces, and bunkering of fuel or bulk lubrication oil (MARPOL 17.2). Oil record book code entries do not align with Appendix III of MARPOL Annex I. Codes pre-date 2006 amendments. Additionally, crew is not recording bilge well to bilge tank transfers as well as transfers from sludge tank to bilge tank. Furthermore, OWS operations do not align with daily sounding logs and recorded data on the OCM.

## **15105 - Resources and personnel**

The company should ensure that all personnel involved into the company's safety management system have an adequate understanding of relevant rules, regulations, codes and guidelines (ISM 6.4). Additionally, 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 (ISM 10.1). In meeting these requirements, the company should ensure that; inspections are held at appropriate intervals (ISM 10.2.1), any non-conformity is reported with its possible cause, if known (ISM 10.2.2).

The objective evidence delineated in deficiencies #1 and #2 attests to the vessel's company failing to ensure that the engineering crew-members had an adequate understanding of how to properly operate the onboard oily water separator in accordance with the appropriate operating procedures while abiding by the relevant rules and regulations. Additionally, the Chief Engineer and Second Engineer informed PSCOs that they received no training pertaining to the newly installed Oil Content Meter (MEPC 107(49)). Also, as denoted in deficiencies #1 and #2, crew did not provide any evidence that inspections and scheduled maintenance were held at appropriate intervals for the OWS.

Ship Name: **ANDES**

Ship Type: **General Dry Cargo Ship**

Flag: **Liberia**

IMO Number: **9399739**

Date of Action: **8/26/2019**

Action Taken: **Detention**

Port: **Gloucester City, New Jersey**

Unit: **Sector Delaware Bay**

Recognized Org: **DNV GL MARITIME**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Not Class Related**

Relevant Certificates:

Organization Related  
to Detention:

Ship Management: Owners, Operators, or Managers

**Columbia Shipmanagement (Deutschland)  
GmbH**

**FS Andes LTD**

Charterers

**Del Monte Fresh Produce Inc.**

Deficiencies: Code - Category

**07126 - Oil accumulation in engine  
room**

Description

The condition of the ship and its equipment shall be maintained to conform with the present regulation to ensure that the ship in all respects will remain fit to proceed to sea without danger to the ship or persons onboard. PSCO observed excessive quantities of oil in multiple locations in the engine room which pose a significant risk of fire. 1) Oil leaks from #1, #3, & #4 generators. Multiple oil soaked rags and buckets containing 1-2 gallons oil each under generators. Deck underneath generators in covered in oil. 2) Significant oil leaks on and under generator fuel oil purifiers. Thick sludge of oil on deck and along purifier space aft bulkhead. 3) Oil soak lagging on steam pipes & bulkheads, oil covering deck and electrical equipment in space directly below purifier space. 4) Significant accumulation of oil, approx. 25 ft. x 25 ft. in size, in bilge aft of the main engine.

Ship Name: **ARABIAN SEA**

Ship Type: **Ro-Ro-Cargo Ship**

Flag: **Marshall Islands**

IMO Number: **9483786**

Date of Action: **5/11/2019**

Action Taken: **Detention**

Port: **Baltimore, Maryland**

Unit: **Sector Maryland-NCR**

Recognized Org: **DNV GL MARITIME**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Not Class Related**

Relevant Certificates:

Organization Related  
to Detention:

Ship Management: Owners, Operators, or Managers

**Arabian Sea AS**

**Sunship Schiffahrtskontor KG**

Charterers

**Grimaldi Euromed**

Deficiencies: Code - Category

**15102 - Company responsibility and  
authority**

Description

**The company should ensure the master is fully conversant with the company's safety management system. PSCO's requested to see portions of the safety management system with regards to reporting requirements and fire fighting equipment maintenance. Captain was unable to locate or understand the vessel's safety management system procedures.**

Ship Name: **ATLANTIC MEXICO**

Ship Type: **Bulk Carrier**

Flag: **Singapore**

IMO Number: **9578775**

Date of Action: **12/20/2019**

Action Taken: **Detention**

Port: **Baton Rouge, Louisiana**

Unit: **MSU Baton Rouge**

Recognized Org: **Lloyd's Register**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Not Class Related**

Relevant Certificates:

Organization Related  
to Detention:

Ship Management: Owners, Operators, or Managers  
**PACC Ship Managers PTE Ltd**  
**Atlantic Mexico PTE Ltd**

Charterers  
**Pacnav De Mexico**

Deficiencies: Code - Category  
**11104 - Rescue boats**

Description  
**Before the ship leaves port and at all times during the voyage all life-saving appliances shall be in working order and ready for immediate use. PSCO observed that the crew was unable to start the rescue boat engine for approximately one hour.**

Ship Name: **BBC NAPLES**

Ship Type: **General Dry Cargo Ship**

Flag: **Antigua and Barbuda**

IMO Number: **9484223**

Date of Action: **8/6/2019**

Action Taken: **Detention**

Port: **Philadelphia, Pennsylvania**

Unit: **Sector Delaware Bay**

Recognized Org: **Bureau Veritas**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Not Class Related**

Relevant Certificates:

Organization Related  
to Detention:

Ship Management: Owners, Operators, or Managers

**MS "Dutch Verena" Shipping Gmbh & Co.  
KG**

**MarShip Bereederungs GmbH & Co. KG**

Charterers

**BBC Chartering Carriers GmbH**

Deficiencies: Code - Category

**15108 - Reports of non-conf.,  
accidents & hazardous occur.**

Description

The company should establish procedures to ensure that the ship is maintained in accordance with the provision of the relevant rules and regulation and with any additional requirement which may be established by the company. In meetings these requirements the company should ensure that: any non-conformity is reported with its possible causes if known; and ensure appropriate corrective action is taken. A significant leak was found on the lube oil purifier that was being captured by a bucket. The smoke detectors around it were operational but held in place with tape. Fire doors for purifier room, emergency escape and CO2 room were also found not to close properly. None of these items were reported to the company, low level hydraulic oil and power failure alarms for steering gear were inoperable and had not been tested or identified. Emergency diesel generator fuel cut off was closed and had not been identified, rendering it unable to function in emergency. Operational deficiencies collectively provide objective evidence of a serious failure or lack of effectiveness of the implementation of ISM code. An external audit is recommended to be conducted within 30 days by Flag State or RO. Provide decision to USCG prior to departure.

**04114 - Emergency source of power -  
Emergency generator**

Where the emergency source of electrical power is a generator, it shall be: started automatically upon failure of the main source of electrical power supply. PSCO found the FO quick closing valve to be in the close position, not allowing for emergency generator to start and run in current state. Engineers were able to open the valve and test functionality in presence of PSCO.

Ship Name: **BELFORT**

Ship Type: **Bulk Carrier**

Flag: **Norway**

IMO Number: **9335020**

Date of Action: **12/7/2019**

Action Taken: **Detention**

Port: **Wilmington, North Carolina**

Unit: **Sector North Carolina**

Recognized Org: **DNV GL MARITIME**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Not Class Related**

Relevant Certificates:

Organization Related  
to Detention:

Ship Management: Owners, Operators, or Managers

**Belships Management (Singapore) PTE Ltd**

**Belfort AS**

Deficiencies: Code - Category

**99102 - Other (SOLAS operational)**

Description

The machinery, boilers, and other pressure vessels, associated piping systems and fittings shall be of a design and construction adequate for the service for which they are intended. PSCO noted exhaust boiler had water leaking from water tubes, which travelled through exhaust casing to turbo charger on MDE. Lagging at turbo charger is saturated and is dripping water onto turbo charger.

**99102 - Other (SOLAS operational)**

The machinery, boilers, and other pressure vessels, associated piping systems and fittings shall be of a design and construction adequate for the service for which they are intended. PSCO noted multiple exhaust leaks throughout engine room including on the exhaust manifold, turbo charger connection and in engine casing room.

**15106 - Shipboard operations**

The safety management system shall be maintained and the company should establish procedures to ensure the ship is maintained in conformity with relevant rules and procedures, and non conforming objective evidence indicates there is an SMS failure aboard the vessel. SMS Manual 4.4.1 requires the master and C/E to report any damage or deficiency to company as soon as they are noted. The boiler water leak was not reported to company, exhaust leaks have not been addressed by crew, vessel personnel are not following procedures for maintenance and repair on electrical systems by inaccurately tagging out inoperable AC units in galley and E/R workshop, and inadequate servicing of EEBDs.



Ship Name: **BERJAYA**

Ship Type: **Supply Ship**

Flag: **Mexico**

IMO Number: **9666118**

Date of Action: **5/13/2019**

Action Taken: **Detention**

Port: **Amelia, Louisiana**

Unit: **MSU Morgan City**

Recognized Org: **Not Classed**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Not Class Related**

Relevant Certificates:

Organization Related  
to Detention:

Ship Management: Owners, Operators, or Managers  
**Dictamismo S de RL de CV**

Deficiencies: Code - Category

**01108 - Load Lines (including  
Exemption)**

**11104 - Rescue boats**

Description

**Ship's Officer or Surveyor shall certify that the marks are correctly and permanently indicated on the ships side. The making on the side of the vessel do not match the Load Line Certificate.**

**Rescue boats shall be stowed in a state of continuous readiness for launching. Port side rescue boat's davit system had an inoperable accumulator valve which prevented the davit from raising/lowering the rescue boat.**



Ship Name: **BETTY K VI**

Ship Type: **Ro-Ro-Cargo Ship**

Flag: **Panama**

IMO Number: **8801216**

Date of Action: **4/11/2019**

Action Taken: **Detention**

Port: **Miami, Florida**

Unit: **Sector Miami**

Recognized Org: **Isthmus Bureau of Shipping**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Not Class Related**

Relevant Certificates:

Organization Related  
to Detention:

Ship Management: Owners, Operators, or Managers  
**MMS Americas LLC**  
**Dorick Navigation , S.A.**

Deficiencies: Code - Category

**15102 - Company responsibility and  
authority**

Description

**Objective evidence discovered during an expanded ISM exam revealed the following non-conformities: The vessel failed to fully implement the requirements of the ISM, Code through their SMS procedures as evident by the following deficiencies indicating that the ship and/or company are not meeting the SMS requirements. Recommend an external audit.**

**01 - The company should ensure that each ship is appropriately manned in order to encompass all aspects of maintaining safe operation onboard. Vessel riot properly manned in accordance with work/rest requirements in the STCW, as outline in Deficiency #02.**

**02 - The company should establish procedures to ensure that personnel are given proper familiarization with their duties. Chief engineer lacked familiarization in recordkeeping requirements for the Oil Record Book Part I. Chief Engineer logged incorrect sounding for dirty oil tank #13 and bilge water tank#12 as outline in deficiency #3. Chief engineer lacked familiarization with onboard oily water separator and indication that 15ppm sensor indication light improperly continually stayed lit. Maintenance records indicate the equipment had no issues and chief engineer appeared to believe there is no issue with the equipment.**

**03 - The company should establish and maintain procedures to control all documents and data relevant to the safety management system. The work/rest log do not indicate whether the vessel is in port or at sea as the form directs to record.**

**01299 - Other (STCW)**

All persons who are assigned duty as officer in charge of a watch shall be provided a minimum of 10 hours of rest in any 24 hour period and 77 hours in any 7 days period. The hours of rest may be divided into no more than three periods, one of which shall be at least 6 hours in length. Parties may allow exception from the required hours of rest provided the rest period is not less than 70 hours in any 7 day period. Exceptions from the weekly rest period shall not be allowed for more than two consecutive weeks. Chief Engineer and 2nd engineer have received fewer than 70 hours weekly rest on multiple recorded occasions between November 2018 and March 2019. Standard workday for engineers is at least 14 hours a day ( 98 work hours a week, 70 rest hours), and both engineers have worked 15 hour days on multiple documented occasions without compensatory reduction in work hours later in 7 day period, leading to multiple weeks with fewer than 70 hours rest. Engineer's regularly received no single rest period of 6 consecutive hours or more a day.

**14102 - Retention of oil on board**

The Oil Record Book Part I shall be completed on each occasion whenever collection of oil residues, as well as disposal occurs. ORB sounding bilge water tank #12 and dirty oil tank #13 remain consistent at 1.00m3 and 0.80m3 since 24November2018 which contrast with Chief engineer's state use of tanks. Soundings taken during exam were approximately 10% less than previous soundings in ORB, with no record of disposal or tank-to-tank transfer.

**14104 - Oil filtering equipment**

Oil filtering equipment referred to in this regulation shall be such as will ensure that any oily mixture discharge into sea after passing through the system has an oil content not exceeding 15ppm. Vessel's oil water separator is inoperable.

Ship Name: **BOUBOULINA**

Ship Type: **Oil Tankship**

Flag: **Greece**

IMO Number: **9298753**

Date of Action: **4/29/2019**

Action Taken: **Detention**

Port: **Philadelphia, Pennsylvania**

Unit: **Marine Safety Detachment Lewes**

Recognized Org: **Lloyd's Register**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Not Class Related**

Relevant Certificates:

Organization Related  
to Detention:

Ship Management: Owners, Operators, or Managers

**Bouboulina-Special Maritime Enterprise**

**Delta Tankers LTD**

Deficiencies: Code - Category

**14104 - Oil filtering equipment**

Description

**Oil Filtering Equipment shall be of a design approved by the Administration and shall be such as will ensure that any oily mixture discarded into the sea after passing through the system has an oil content not exceeding 15PPM. Upon conducting an operational test of the oily water separator, the effluent being processed would not be filtered below 15PPM on the oil content meter unless freshwater was back flushed through the system. The system was run by the crew intermittent for over an hour. The only time the system sample effluent registered below 15ppm was when the crew back flushed the oily water separator's second stage with fresh water.**



Ship Name: **CAMILA B**

Ship Type: **Gas Carrier (Non-Specified)**

Flag: **Panama**

IMO Number: **9177306**

Date of Action: **5/29/2019**

Action Taken: **Detention**

Port: **Corpus Christi, Texas**

Unit: **Sector Corpus Christi**

Recognized Org: **DNV GL MARITIME**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Class Related**

Relevant Certificates: **IMO Cert of Fitness**

Organization Related  
to Detention: **DNV GL MARITIME**

Ship Management: Owners, Operators, or Managers  
**Transgas Shipping Lines S.A.C.**

**Mimosa RO Limited**

Charterers

**Mexichem**

Deficiencies: Code - Category

**15109 - Maintenance of the ship and  
equipment**

Description

**Objective evidence discovered during an expanded ISM exam revealed the following non-conformities: The vessel failed to fully implement the requirements of the ISM Code through their SMS procedures as evident by the following deficiencies indicating that the ship and/or company are not meeting the SMS requirements. Recommend an external audit.**

**The company should identify equipment and technical systems the sudden operational failure of which may result in hazardous situations. The safety management system should provide for specific measures aimed at promoting the reliability of such equipment or systems. The lack of maintenance on the fire-fighting equipment, light fixtures, and emergency shutdown cargo valve demonstrates a breakdown in the vessel's SMS implementation.**

**07108 - Ready availability of fire  
fighting equipment**

**The dry chemical system should be capable of delivering powder from at least two hand hose lines or combination monitor/hand hose lines to any part of the above-deck exposed cargo area including above-deck product piping. Three out of the four fixed dry chemical stations located on deck have cracking of the hose material at the nozzle connection points. Additionally, nozzle connection points are corroded and loose.**

**12107 - Fire protection cargo deck  
area**

**Electrical installations should be such as to minimize the risk of fire and explosion from flammable products. Numerous light fixtures, within and around the gas-dangerous zone, found with defects as follows: yellow deck light fixture above cargo tank 2 port with loose wiring connections, fixture between compressor and motor room doors on port side contains standing water, fixture above "PSA" door contains standing water, fixture on catwalk above cargo tank 1 found with loose lens cover, fixture forward of the foremost shelter on catwalk found with pinhole in bottom of the lens cover, and electrical switch for the cargo heating system located forward and above manifold and cargo tank 2 is wasted with dead-end wiring.**

**06106 - Cargo transfer - Tankers**

**Emergency shutdown valves in liquid piping should fully close under all service conditions with 30 s of actuation. Unable to verify complete closure of emergency shutdown valve on liquid line number one, port side manifold. Indicator on valve top is askew, and does not fully reflect open or closed condition.**



Ship Name: **CAP REINGA**

Ship Type: **Containership**

Flag: **Liberia**

IMO Number: **9399765**

Date of Action: **5/6/2019**

Action Taken: **Detention**

Port: **Savannah, Georgia**

Unit: **MSU Savannah**

Recognized Org: **DNV GL MARITIME**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Not Class Related**

Relevant Certificates:

Organization Related  
to Detention:

Ship Management: Owners, Operators, or Managers

**Columbia Shipmanagement (Deutschland)  
GmbH**

**FS Andino Limited**

Charterers

**SEALAND AMERICAS**

Deficiencies: Code - Category

**14104 - Oil filtering equipment**

Description

**After any survey of the ship under paragraph I of this regulation has been completed, no change shall be made in the structure, equipment, systems, fittings, arrangements or material covered by the survey with our the sanction of the administration , except the direct replacement. PSCO observed while running oily water separator hat a 1/4 turn ball valve was fitted on the discharge side of the oil content the meter, that when closed would not allow the discharge sample to flow across the content meter phot eye, allowing affluent from OWS to be discharge over board. Line diagram of system did not show valve.**

Ship Name: **CARIB TRADER II**

Ship Type: **Containership**

Flag: **Saint Vincent and the Grenadines**

IMO Number: **7396599**

Date of Action: **12/20/2019**

Action Taken: **Detention**

Port: **Miami, Florida**

Unit: **Sector Miami**

Recognized Org: **National Shipping Adjusters**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Not Class Related**

Relevant Certificates:

Organization Related  
to Detention:

Ship Management: Owners, Operators, or Managers

**Grace Holding International S.A.**

**Excelsior Holdings International S.A.**

Deficiencies: Code - Category

**14104 - Oil filtering equipment**

Description

**Any ship of 400 gross tonnage and above but less than 10,000 gross tonnage shall be fitted with oil filtering equipment complying with paragraph 6 of this regulation. The Administration shall have regard the specification recommended by the Organization. Every access of 15 ppm bilge alarm beyond the essential requirements of 4.2.8 requires the breaking of a seal. The Oil Content Meter is designed to the specification of MEPC 107 (49), but lacked the presence of a tamper evident seal.**

**15106 - Shipboard operations**

**Objective evidence discovered during an expanded ISM exam revealed requirements of the ISM Code through their SMS procedures as evident by the following deficiencies indication that the ship and/or company are not meeting the SMS requirements. Recommend an external audit.**

**The company should establish procedures for key shipboard operations concerning the safety of personnel, ship, and the protection of the environment. The Chief Engineer was unfamiliar with the procedures to perform the operation test of the OWS and was unable to access the history of the Oil content meter as required by MEPC 107(49).**

**13101 - Propulsion main engine**

**After any survey of the ship has been completed no change shall be made without the sanction of the Administration. The main propulsion engine governor has been disconnected and is controlled manually via a nylon string.**

Ship Name: **CARIBE ROSA**

Ship Type: **Chemical Tankship**

Flag: **Liberia**

IMO Number: **9286451**

Date of Action: **3/14/2019**

Action Taken: **Detention**

Port: **Mobile, Alabama**

Unit: **Sector Mobile**

Recognized Org: **American Bureau of Shipping**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Not Class Related**

Relevant Certificates:

Organization Related  
to Detention:

Ship Management: Owners, Operators, or Managers

**ADK Maritime Pte Ltd**

**Parchem IV AS**

Charterers

**Caribe Tankers Ltd**

Deficiencies: Code - Category

**11129 - Operational readiness of  
lifesaving appliances**

**07199 - Other (fire safety)**

**02108 - Electrical installations in  
general**

Description

**All life-saving appliances shall be in working order and ready for immediate use. The davit for the rescue boat and davit-launched life raft deployment was found to be inoperable.**

**Electrical installations shall be such as to minimize the risk of fire and explosion from flammable products. Electrical equipment located on the cargo deck grounding straps are disconnected or missing.**

**Independent cargo tanks shall be electrically bonded to the hull along with all gasketed cargo pipe joints and hose connections shall be electrically bonded. Bonding cables located on the cargo deck are either missing or deteriorated.**

Ship Name: **CEPHEUS LEADER**

Ship Type: **Ro-Ro-Cargo Ship**

Flag: **Panama**

IMO Number: **9308883**

Date of Action: **9/11/2019**

Action Taken: **Detention**

Port: **Tacoma, Washington**

Unit: **Sector Puget Sound**

Recognized Org: **Nippon Kaiji Kyokai**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Not Class Related**

Relevant Certificates:

Organization Related  
to Detention:

Ship Management: Owners, Operators, or Managers

**Ocean Empire (Panama) SA**

**Excel Marine Co Ltd**

Charterers

**Nippon Yusen Kaisha (NYK) Lines**

Deficiencies: Code - Category

**11119 - Immersion suits**

Description

**An immersion suit , complying with the requirements of section 2.3 of the code, of an appropriate size, shall be provided for every person assigned to crew the rescue boat or assigned to the marine evacuation system party. At least 10 of the vessel immersion suits zippers were separated from the body of the suit.**

Ship Name: **CINDY TIDE**

Ship Type: **Supply Ship**

Flag: **Mexico**

IMO Number: **9421702**

Date of Action: **9/17/2019**

Action Taken: **Detention**

Port: **Houma, Louisiana**

Unit: **MSU Houma**

Recognized Org: **American Bureau of Shipping**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Not Class Related**

Relevant Certificates:

Organization Related  
to Detention:

Ship Management: Owners, Operators, or Managers

**Tidewater de Mexico S de RL de CV**

Deficiencies: Code - Category

**04114 - Emergency source of power -  
Emergency generato**

Description

**Each emergency generating set arranged to be automatically started shall be provided with a second source of energy which shall be provided for an additional three starts within 30 minutes unless manual starting can be demonstrated to be effective. The ship is provided with two means of start for the emergency generator, one of which is electrical and the other is a manual hand crank. During examination of emergency generating sets, PSCO's observed the manual crank starter to be missing from the prime mover.**



Ship Name: **CLIPPER KAMOSHIO**

Ship Type: **Bulk Carrier**

Flag: **Panama**

IMO Number: **9400899**

Date of Action: **1/15/2019**

Action Taken: **Detention**

Port: **Philadelphia, Pennsylvania**

Unit: **Sector Delaware Bay**

Recognized Org: **Nippon Kaiji Kyokai**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Not Class Related**

Relevant Certificates:

Organization Related  
to Detention:

Ship Management: Owners, Operators, or Managers  
**Moon Rise Shipping Co, SA**  
**Seyeong Maritime Co., Ltd**  
Charterers  
**Clipper Bulk A/ S**

Deficiencies: Code - Category

**07113 - Fire pumps and its pipes**

**07108 - Ready availability of fire  
fighting equipment**

**07126 - Oil accumulation in engine  
room**

Description

The machinery, boilers and other pressure vessels, associated piping system and fittings shall be of a design and construction adequate for the service for which they are intended. The design shall have regard to materials used in construction, the purpose for which the equipment is intended, and conditions on board. A temporary repair consisting of a rubber patch was observed on the discharge side of the fire/general service pump. The repair leaked significantly when the system was pressurized. The Responsible Organization did not authorize the repair.

Fire-extinguishing appliances shall be readily available. All three fire pumps have a manual valve closed on the suction side making remote starting and immediate water delivery unavailable.

The purpose of this regulation is to prevent the ignition of combustible materials or flammable liquids. For this purpose, the following shall be met: means shall be provided to control leaks of flammable liquids. Observed excessive oil leaks on the fuel oil and lube oil purifying units and associated piping. Crew attempted to reduce these leaks using rags that were hidden by cardboard which had been painted to match the purifiers and associated piping. Additional significant oil leads were found on the main engine and energy generator.

**15109 - Maintenance of the ship and equipment**

The company should establish procedures to ensure that the ship is maintained in accordance with the provision of the relevant rules and regulations and with any additional requirements which may be established by the company. In meeting these requirements, the company should ensure that : any non-conformity is reported, with its possible causes, if known; and ensure appropriate corrective action is taken. An unauthorized temporary repair was made to the discharge side of the fire and general service pump and was not reported to the Recognized Organization. Excessive oil leaks were observed on the oil purifier pumps and on the emergency generator, representing a significant fire hazard. Cardboard was painted and placed on the piping and oil purifier pumps which concealed rags and leaks. The crew made unsatisfactory repairs to the oily water supply piping that were not reported to the Responsible Organization. Operational-related deficiencies collectively provide objective evidence of a serious failure, or lack of effectiveness, of the implementation of the ISM Code. No evidence of required reporting to the designated person was observed. An external audit is recommended to be conducted within 30 days by the flag state or RO to determine whether the ship is operating in accordance with the ISM Code. Provide decision to USCG prior to departing port.





Ship Name: **CLOVER**

Ship Type: **Chemical Tankship**

Flag: **Marshall Islands**

IMO Number: **9307994**

Date of Action: **2/7/2019**

Action Taken: **Detention**

Port: **Jacksonville, Florida**

Unit: **Sector Jacksonville**

Recognized Org: **Lloyd's Register**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Not Class Related**

Relevant Certificates:

Organization Related  
to Detention:

Ship Management: Owners, Operators, or Managers  
**Bernhard Schulte Shipmanagement (India)**  
**Fulton Clover Ltd**

Charterers  
**Petrobras**

Deficiencies: Code - Category  
**15101 - Safety and environment  
policy**

Description

**Objective evidence discovered during an expanded ISM exam revealed the following nonconformities: The vessel failed to fully implement the requirements of the ISM code through their SMS procedures as evident by the following deficiencies indicating that the ship and/or company are not meeting the SMS requirements. Recommend an external audit. The safety management system shall be maintained in accordance with the provision of the International Safety Management Code.**

**The company should establish procedures, plans and instructions including checklist, as appropriate, for key shipboard operations concerning the safety of the personnel and ship and protection of the environment. The various task should be defined and assigned to qualified personnel.**

**The company should identify equipment and technical system the sudden operational failure of which may result in hazardous situations. The safety management system should provide for specific measures at promoting the reliability of such equipment or systems. These measures should include the regular testing of standby arrangements and equipment or technical systems that are not in continuous use. The following were noted:**

**1) The ship' safety management system requires three (3) operational person gas detectors. Out of six (6) detectors on board, five (5) were not operational, leaving only one (1) to be utilized by 21 crew members for the first line of defense on a chemical tank ship. The ship's safety management system requires a 12-month supply of calibration gas on board for the personal gas detectors. There was no calibration gas non board for the personal gas detectors. The vessel's Class Society and Administration were not notified of these non-conformities.**

**2) The inert gas generator requires calibration to cargo operations per the ship's Safety Management System. The vessel's last calibration was recorded on**

18DEC2018. The crew state that the last calibration was conducted two days ago, this was not logged. Furthermore, the crew displayed unfamiliarity with the process of calibration.

3) The inert gas generator was actively leaking water form its cover plate. This cover plate showed signed of previous temporary repairs for patches. The vessels' Class Society Administration were not notified, confirmed by the Flag State Surveyor on board the vessel.

07102 - Inert gas system

The inert gas generator requires calibration to cargo operations per the ship's Safety Management System. The vessels last calibration was recorded on 18DEC2018. The crew state that the last calibration was conducted two days ago, this was not logged. Furthermore, the crew display unfamiliarity with the process of calibration.

07102 - Inert gas system

The inert gas generator was actively leaing water form the cover plate. This cover plate showed signed of previous temporary repairs for patches. The vessels' Class Society Administration were not notified, confirmed by the Flag State Surveyor on board the vessel.

15102 - Company responsibility and authority

The company should establish procedure to ensure that the ship is maintained in conformity with the provision of relevant rules and regulations and with any additional requirements which may be established by the company. Means shall be provided to control leaks of flammable liquids. Per the Shipboard Preventative Maintenance Schedule, all fuel oil pumps on both #2 and #3 ships service generators were overdue of inspection and overhaul. The #1 fuel oil pump on the #2 ship's service generator was actively spraying fuel oil, creating a fire hazard. The #2 fuel oil pump on the #3 ships service generator was actively weeping fuel.

15102 - Company responsibility and authority

The company should establish procedure to ensure that the ship is maintained in conformity with the provisions of relevant rules an regulations and with any additional requirements which may be established by the company. The condition of the ship and its equipment shall be maintained to ensure that the ship in all respect will remain fit to proceed to sea. The jacked water seal o cylinder #2 of the main diesel engine is actively leading jacket water at tan approximate rate of one gallon per hour. The vessel's Class Society and Administration were not notified.



Ship Name: **CMA CGM AMAZON**

Ship Type: **Containership**

Flag: **Liberia**

IMO Number: **9706308**

Date of Action: **1/17/2019**

Action Taken: **Detention**

Port: **Los Angeles, California**

Unit: **Sector Los Angeles-Long Beach**

Recognized Org: **Lloyd's Register**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Not Class Related**

Relevant Certificates:

Organization Related  
to Detention:

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

Charterers  
**CMA CGM Lines**

Deficiencies: Code - Category

**15101 - Safety and environment  
policy**

Description

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: "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 "I".... 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 "I". 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." The ship operating manual is referenced by the ship's safety management system manual.

**15108 - Reports of non-conf., accidents & hazardous occur.**

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.

**07199 - Other (fire safety)**

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 JAN20 18, when report No. 137 was generated.

**14105 - Pumping, piping and discharge arrangements**

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.

**14101 - Control of discharge**

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.

**13105 - UMS - Ship**

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.

**14101 - Control of discharge**

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.

Ship Name: **CMA CGM EIFFEL**

Ship Type: **Containership**

Flag: **Malta**

IMO Number: **9248112**

Date of Action: **3/10/2019**

Action Taken: **Detention**

Port: **Seattle, Washington**

Unit: **Sector Puget Sound**

Recognized Org: **Bureau Veritas**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Not Class Related**

Relevant Certificates:

Organization Related  
to Detention:

Ship Management: Owners, Operators, or Managers

**CMA CGM International Shipping Company  
Pte Ltd**

Deficiencies: Code - Category

**11118 - Lifejackets incl.provision  
and disposition**

**15107 - Emergency preparedness**

Description

**A lifejacket complying with the requirement of paragraph 2.21 or 2.222 of the LSA code shall be provided for every person on board. The ship has a crew of 21 persons but no individually dedicated lifejackets. There are a total of 14 adult lifejackets onboard the ship.**

**Ships shall comply with the requirements of the ISM Code. The code requires that the safety management shall ensure compliance with mandatory rules and regulations. The portion of the ships SMS regarding lifejackets required only 15 adult lifejackets onboard. The requirement is not in compliance with 74 SOLAS (2014 Cons). Recommend external audit of the life-saving appliance (LSA) part of the ship's SMS.**





Ship Name: **COLUMBIA**

Ship Type: **Bulk Carrier**

Flag: **Liberia**

IMO Number: **9423530**

Date of Action: **3/14/2019**

Action Taken: **Detention**

Port: **Portland, Oregon**

Unit: **Sector Columbia River**

Recognized Org: **Nippon Kaiji Kyokai**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Not Class Related**

Relevant Certificates:

Organization Related  
to Detention:

Ship Management: Owners, Operators, or Managers

**MS Nova "Columbia" Schiffahrtsgesellschaft  
Mbh & C**

**Orion Reederei GmbH & Co KG**

Charterers

**New Columbia Maritime Ltd**

Deficiencies: Code - Category

**11135 - Maintenance of Life Saving  
Appliances**

**11112 - Launching arrangements  
for survival craft**

**02199 - Other (Structural condition)**

Description

Falls used in launching shall be inspected periodically with special regard for areas passing sheaves, and renewed when necessary due to deterioration of the falls or at intervals of not more than 5 years, whichever is the earlier. The port and starboard lifeboat falls were last renewed in January 2014 and passed the required 5 year renewal.

Maintenance, testing and inspections of life-saving appliances shall be carried out based on the guidelines developed by the organization and in a manner having due regard to ensuring reliability of such appliances. The crew made unapproved weld repairs to the port side lifeboat davit, which was not evaluated or properly weight tested in accordance with SOLAS as LSA Code regulations.

In addition to the requirements contained elsewhere in present regulation, ships shall be designed, constructed, and maintained in compliance with the structural, mechanical and electrical requirements of a classification society. Piping on the main diesel engine's salt water cooling system has approximately 08 leaks with temporary repairs made by the crew without approval of the vessel's classification society.

**15109 - Maintenance of the ship and equipment**

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. Objective evidence during an expanded ISM exam revealed that the ship's procedures, related to the inspection of the survival craft and associated equipment are not followed as stated in regulations and onboard documentation. The crew made unauthorized repairs to the port side life boat launching arrangement with no notification to the company in accordance with ship's procedures. In addition, at least 08 active leaks and 08 temporary repairs were discovered on salt water cooling system piping, however, the repairs performed by the crew were not approved by the classification society. The crew did not advise the company per ship's procedures. It is recommended that an external third party audit of the SMS be conducted with regard to deficiencies No. 01, No. 02, No. 3 and the vessel's procedures with regard to inspection intervals of survival craft and associated lifesaving equipment.



Ship Name: **CONTI LYON**

Ship Type: **Containership**

Flag: **Portugal**

IMO Number: **9222285**

Date of Action: **9/11/2019**

Action Taken: **Detention**

Port: **Staten Island, New York**

Unit: **Sector New York**

Recognized Org: **Bureau Veritas**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Not Class Related**

Relevant Certificates:

Organization Related  
to Detention:

Ship Management: Owners, Operators, or Managers  
**NSB Niaderelbe Schiffahrts GmbH & Co**  
**Conti 26 Conti Lyon**

Charterers  
**Mediterranean Shipping Company, S.A.**

Deficiencies: Code - Category

**07110 - Fire fighting equipment and  
appliances**

Description

**The purpose of this regulation is to maintain and monitor the effectiveness of the fire safety measures, the ship is provided with. For the purpose of the following functional requirements shall be met: Fire protection systems and fire fighting systems and appliances shall be maintained ready for use.**

**Activated emergency fire and tested fire hose on starboard bridge wing and tested fire hose which discharged oil mixed with fire fighting water. Examined fire stations and found additional 02 to be contaminated with oil on deck and 02 contaminated fire stations in the engine room. Also found hole in main fire pipe leaking water in to a 55-gallon drum which filled completely in one hour. Lastly, found 06 fire extinguishers overdue for servicing.**

**13104 - Bilge pumping arrangements**

**The condition of the ship and its equipment shall be maintained to conform with the provisions of the present regulations to ensure that the ship in all respects will remain fit to proceed to sea without danger to the ship or persons on board.**

**When conducting engine room exam, found 18 inches of oily water mixture in starboard side aft bilge well underneath shaft seal and in starboard side bilge well underneath propeller shaft. See first deficiency for oil found in the fire main system.**

**15108 - Reports of non-conf.,  
accidents & hazardous occur.**

The safety management system should include procedures ensuring that the non-conformities, accidents and hazardous situations are reported to the company, investigated and analyzed with the objective of improving safety and pollution prevention. Master explained that vessel sucked up oil from a sheen in the water while sailing through the Persian Gulf two months ago via the ships emergency fire pump. One month later, BOSUN reported that the pool “reeked” of a fuel oil smell while attempting to fill the pool. Captain failed to report either instance to the company and was not surprised when fire hose on bridge wing discharged oily water mixture.

In addition, galley fixed CO2 extinguisher had not been checked since March 2019. Battery room extinguisher has not been checked since June 2019. Engine room had 04 extinguishers overdue for annual servicing but are marked “OK” or “Good” on monthly servicing tag. Recommend full ISM audit.



Ship Name: **COPENHAGEN**

Ship Type: **General Dry Cargo Ship**

Flag: **Antigua and Barbuda**

IMO Number: **9457115**

Date of Action: **3/5/2019**

Action Taken: **Detention**

Port: **Wilmington, North Carolina**

Unit: **Sector North Carolina**

Recognized Org: **DNV GL MARITIME**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Not Class Related**

Relevant Certificates:

Organization Related  
to Detention:

Ship Management: Owners, Operators, or Managers  
**Sunship Schiffahrtskontor KG**  
**Reederei M Lauterjung Gmbh & Co. KG**

Deficiencies: Code - Category

**07109 - Fixed fire extinguishing  
installation**

Description

**Fire protection systems & fire fighting systems & appliances shall be maintained & ready for use. PSCO found ship's water supply valve for water mist system in closed position, which renders the automatic system inoperable. Chief Engineer stated he closed the valve for the safety of the crew & also stated he does not know how long valve was closed and there is no entry in the engine log book.**

**09210 - Machinery**

**The machinery & associated piping systems & fittings shall be of a design & construction adequate for the service for which they are intended. The lube oil heat exchanger (plate cooler) has fresh water gushing out from the water in line & there is a temporary baffle installed to direct water down into the bilge.**

**07126 - Oil accumulation in engine  
room**

**Means shall be provided to control leaks of flammable liquids. Oil soaked lagging is present in multiple places in engine room including, but not limited to, above the condenser on hot well, over the LT cooling water pump & over the lube oil 3-way valve.**

**07106 - Fire detection and alarm  
system**

**Fire detection & fire alarm systems shall be kept in good working order so as to ensure their required performance if a fire occurs. The smoke detector at the base of the stairway in the engine room was inoperable during testing.**

**07106 - Fire detection and alarm  
system**

**A ship when in a port of another contracting Govt is subject to control by officers duly authorized concerning operational requirements in respect to the safety of ships when there are clear grounds for believing the master or crew are not familiar with essential shipboard procedures relating to the safety of ships. After operational testing of smoke detectors, PSCO requested heat detectors at boiler be tested. C/E offered lighter for testing & the 2/E did not know how to test. In addition, the electrician attempted to test a different heat detector with smoke, unaware it was not a smoke detector.**



**15106 - Shipboard operations**

**The safety management system should ensure compliance with mandatory rules & regulations. The vessel was unable to provide transfer procedures & none were posted at the bunker stations.**

**15106 - Shipboard operations**

**The safety management system shall be maintained. Due to objective evidence during port state control exam, there has been a failure of SMS aboard the vessel as evidenced by the deficiencies identified, lack of crew familiarity with testing of fire fighting appliances, operation & testing of rescue boat motor, & overall condition of engine room. An SMS audit is recommended.**



Ship Name: **CS ZEPHYR**

Ship Type: **Oil Tankship**

Flag: **Liberia**

IMO Number: **9308819**

Date of Action: **10/2/2019**

Action Taken: **Detention**

Port: **Port Arthur, Texas**

Unit: **MSU Port Arthur**

Recognized Org: **Bureau Veritas**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Not Class Related**

Relevant Certificates:

Organization Related  
to Detention:

Ship Management: Owners, Operators, or Managers  
**Stealth Maritime Corporation S. A.**

**AI Giorgis Oil Trading Limited**

Charterers

**ClearLake Shipping PTE Ltd**

Deficiencies: Code - Category

**13101 - Propulsion main engine**

**13101 - Propulsion main engine**

**02108 - Electrical installations in  
general**

Description

The condition of the ship and its equipment shall be maintained to conform with the provision of the present regulation to ensure that the ship in all respects will remain fit to proceed to sea without danger to the ship or persons on board. During PSC exam, PSCOs observed fuel oil leaking out of the main propulsion engine's #6 high pressure fuel line at the cylinder ahead while the engine was not running. Under normal conditions none should be seen leaking.

The condition of the ship and its equipment shall be maintained to conform with the provision of the present regulation to ensure that the ship in all respects will remain fit to proceed to sea without danger to the ship or persons on board. During PSC exam, PSCOs observed excessive amounts of jacket water pouring out from the ship's main propulsion engine's #1 and #6 cylinder seals.

Cables and wiring shall be installed and supported in such a manner as to avoid chaffing or other damage. During PSC exam, PSCOs observed numerous electrical hazards including but not limited to chaffed and cut electrical cable insulation on the middle SSDG exhaust temperature RTD, purifier room motor controller cabling, multiple purifier room electrical valve controller wires were pulled out of the packing, sludge tank remote level indicator wires in the purifier room were pulled out of the packing, the oxygen analyzer transmitter box cables were pulled out of the packing, the emergency alarm annunciator's electrical wires were pulled out of the packing, wires to the ventilation damper motor controller were twisted and pulled out of the electrical box, a fire detector in the engine room was found with a cut cable going into the packing, exposed wiring was found near the steam heater for the fuel oil booster skid in the purifier room, and all three SSDG main electrical distribution lines at the generator boxes appeared to be cracked and deteriorated.

**02108 - Electrical installations in general**

All electrical apparatus shall be constructed and installed as not to cause injury when handled or touched in the normal manner. PSCOs observed that the means to secure power to the motor controller for the #1 and #2 HFO purifiers and fuel oil supply and circulation pumps were broken which would expose the crew to live electrical hazards in order to secure power at the motor controllers locally.

**02108 - Electrical installations in general**

Where cables which are installed in hazardous areas introduce risk of fire or explosion in the event of an electrical fault, special precaution against such risk shall be taken. During PSC exam, PSCO's observed fuel oil on and inside the motor controller of the fuel oil pump motors.

**09232 - Cleanliness of engine room**

Purpose of this regulation is to prevent the ignition of combustible material. Ignition sources shall be separated from combustible materials. PSCO observed main engine cylinder #6 was leaking fuel oil from the high -pressure fuel injector. Evidence of excessive leaking was found in the engine room. Diesel-soaked rags were found around the cylinders, unapproved plastic collection buckets full of oil mixtures are located in two separate areas in the engine room, creating a fire hazard. The oil purifier room was found in disrepair with extensive oil accumulation.

**99102 - Other (SOLAS operational)**

When defect is discovered, which affects the safety of this ship or the efficiency or completeness of its equipment, then master or vessel's representative shall report at the earliest opportunity to the Administration or the RO responsible for issuing the relevant certificate as well as the authorities of the port State in which the vessel is in. PSCOs conducted Port State Control exam and observed numerous condition which affected the safety of the ship and the completeness of its equipment and were not made aware to the USCG by the vessel's master nor the RO responsible for issuing the relevant certificates.

**15109 - Maintenance of the ship and equipment**

The Company should ensure that inspections are held at appropriate intervals, any non-conformity is reported, and appropriate corrective action is taken. The vessel's safety management system required weekly, monthly, and annual inspection of the marine sanitation device. Records show that the weekly, monthly, and annual inspections were not conducted as often as required by the ship's safety management system. PSCOs identified a crack on the marine sanitation tank as well as human feces covering the tank, both of which were not reported by the vessel, nor was there evidence of any corrective action being taken except for a bucket placed beneath the tank to collect the leaking contents.

**15102 - Company responsibility and authority**

Every company should develop, implement and maintain a safety management systems which include instructions and procedures to ensure safe operation of ships and protection of the environment in compliance with relevant international and flag State legislation. During the expanded ISM exam PSCOs received verbal statements from the crew that the vessel had not prioritized the implementation of ISM procedures prior to entry into US water. The lack of implementation became further evident during the examination of record for parts requisition by the crew to the company. It was found that the vessel had requested parts for various systems including vital equipment as early as January of 2019 which weren't received until September of 2019. The crew informed PSCOs that this was when the vessel was scheduled to operate in US waters after a 4 year gap from the previous US port state control exam. Record showed a total of 106 parts were request for the vessel since January and 44 of these parts were received on September 14, two weeks prior to the vessel arrival in US waters. 146 maintenance items were discovered to be overdue across systems which encompass machinery, lifesaving, firefighting, accommodations, cargo, ballast, and navigation. Evidence indicated that some of these items were overdue as result of the need for parts which were not readily provided to the vessel.

**15102 - Company responsibility and authority**

Objective evidence discovered during an expanded ISM examination revealed the following major non-conformity; the vessel failed to fully implement the requirements of the SMS as evident by deficiency #1-9. An external audit is required.

Ship Name: **CSL MANHATTAN**

Ship Type: **Containership**

Flag: **Liberia**

IMO Number: **9289556**

Date of Action: **5/27/2019**

Action Taken: **Detention**

Port: **Tacoma, Washington**

Unit: **Sector Puget Sound**

Recognized Org: **Lloyd's Register**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Not Class Related**

Relevant Certificates:

Organization Related  
to Detention:

Ship Management: Owners, Operators, or Managers  
**Universal Shipping Alliance Ltd**  
**Chain Maritime S.A.**  
Charterers  
**Ocean Network Express Pte Ltd**

Deficiencies: Code - Category  
**07108 - Ready availability of fire  
fighting equipment**

Description  
**The fire-fighting system and appliances shall be kept in  
good working order and readily available for immediate  
use. The PSCO discovered that 08 of the engine room  
smoke detectors were inoperable. 02 of these smoke  
detectors were the only smoke detectors in the purifier  
room.**

Ship Name: **DELPHINUS LEADER**

Ship Type: **Ro-Ro-Cargo Ship**

Flag: **Japan**

IMO Number: **9174282**

Date of Action: **8/9/2019**

Action Taken: **Detention**

Port: **Baltimore, Maryland**

Unit: **Sector Maryland-NCR**

Recognized Org: **Nippon Kaiji Kyokai**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Not Class Related**

Relevant Certificates:

Organization Related  
to Detention:

Ship Management: Owners, Operators, or Managers

**Hachiuma Steamship Co., Ltd.**

**Nippon Yusen Kabushiki Kaisha (NYK Line)**

Charterers

**Milford Shipholding S.A.**

Deficiencies: Code - Category

**07126 - Oil accumulation in engine room**

**02105 - Steering gear**

**07126 - Oil accumulation in engine room**

**15109 - Maintenance of the ship and equipment**

Description

Oil fuel and lubricating oil pipelines shall be screened or otherwise suitably protected to avoid oil spray or oil leakages on hot surfaces in periodically unattended machinery spaces. Lagging from the exhaust pipe at the main engine cylinder heads were soaked with oil. Also, lagging at the base of the turbo was deteriorated.

The condition of the ship and its equipment shall be maintained to conform with the provisions of the present convention. PSCO observed undocumented temporary patch on the #2 hydraulic return line. When the 1st Engineer was asked about the patch he stated it was there for chafing protection. PSCO asked to remove the patch to see the condition beneath it and when removed the #2 hydraulic return line started leaking excessive hydraulic fluid from the steering gear.

The condition of the ship and its equipment shall be maintained to conform to the provisions of the present convention. PSCO observed fuel leak at main engine crank case and main engine cylinders. Oil soaked rags and oil filled containers were also observed throughout the engine room.

The company should ensure that inspections are held at regular intervals, any non-conformity is reported, appropriate corrective action is taken and records are maintained. PSCO observed, for at least the previous 6 months, the engineering watch has not been logging rounds, documenting known discrepancies or including discrepancies into their maintenance plan in accordance with their SMS including, but not limited to, the previously identified discrepancies.





Ship Name: **DORIS T**

Ship Type: **General Dry Cargo Ship**

Flag: **Tanzania**

IMO Number: **7626748**

Date of Action: **1/28/2019**

Action Taken: **Detention**

Port: **Miami, Florida**

Unit: **Sector Miami**

Recognized Org: **CONARINA**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Class Related**

Relevant Certificates: **Safety Management Certificate**

Organization Related  
to Detention: **CONARINA**

Ship Management: Owners, Operators, or Managers  
**Caribbean Ship Services**  
**Eva De Shipping L.L.C.**

Deficiencies: Code - Category

**15105 - Resources and personnel**

Description

Objective evidence discovered during an expanded ISM exam revealed the following nonconformities: the vessel failed to fully implement the requirement of the ISM Code through their SMS procedures as evident by the following deficiencies indicating that the ship and/or company are not meeting the SMS requirements. Recommend and external audit.

The company should ensure that each ship is appropriately manned in order to encompass all aspects of maintaining safe operation on board. The following manning deficiencies have been found:

1) Captain did not display proper practical knowledge or understanding of vital equipment on board in order to properly operate the GMDSS, MF/HF Radio and other crucial equipment for safe navigation. Captain could not identify MF/HF on board and when pointed out, he explained he was only familiar with Furnuno system. Captain explained MF//HF had not been in use or tested since he has been on board.

2) Chief Engineer is unfamiliar with requirements for conducting oil transfer operations in the United States. Chief could not produce or explain U.S regulation for bunkering in the United States. Chief was unaware such regulations existed.

**15106 - Shipboard operations**

The company should establish procedures, plans and instructions, including checklists as appropriate, for key shipboard operations concerning the safety of the personnel, ship and protection of the environment. The various task should be defined and assigned to qualified personnel. Company did not provide specific instructions to the captain or Chief Mate regarding operations in United States Waters. Captain asked PSCO for a list of U.S. requirements because they had not been provided to him. Chief Mate made pre-arrival entry in logbook and stated he was only making the entry base off of knowledge from previous ships and no SMS procedure existed. PSCO was asked by the Captain how the update charts and publications. Ship's crew did not have any means to update charts and relied on U.S. agents provide chart corrections.

**15108 - Reports of non-conf., accidents & hazardous occur.**

The company should establish procedures for the implementation of corrective action, including measures intended to prevent recurrence. Radar had been reported as broke by previous Master via Company's NCR in April of 2017 and has not been fixed by the company.

**15102 - Company responsibility and authority**

The company should ensure that all personnel involved in the company's safety management system have an adequate understanding of relevant rules, regulations, and codes. Captain has little knowledge of applicable rules and regulations. Captain was not able to provide PSCO with MARPOL regulations for garbage, did not know how to identify an ANNEX V special area along the route of the vessel. Chief Engineer is unfamiliar with the requirements of MARPOL ANNEX I and VI. Chief Engineer did not know of requirements for bunker delivery notes or Sulphur content. Chief Engineer was unable to properly fill out Oil Record book and left out entries for Sludge Discharges.

**01201 - Certificates for master and officers**

Each candidate for certification shall have completed approved education and training and meet the standards of competence specified in section A-II/2 of the STCW Code for masters and chief mates on ships of 3,000 gross tonnage or more. Captain is unable to meet the required competency, knowledge, proficiency, and demonstrating ability specified within tables A-II/2 including responding to navigational emergencies, and maintain safety and security of the ship's crew with regards to lifesaving, firefighting, and other safety systems. Captain has extremely limited knowledge of MARPOL STCW, SOLAS, and United States requirements.

**01201 - Certificates for master and officers**

Every candidate for certification shall have completed approved education and training and meet the standard of competence specified in section A-II/2 of the STCW Code. Chief Engineer is unable to meet the required competency, knowledge, proficiency, and demonstrating ability specified within tables A-III/2 including managing fuel, lubrication and ballast operations, and monitor control with legislative (CFR) requirements.

**01203 - Certificates for radio personnel**

Every candidate shall meet the standards of competence specified in Section A-IV/2 of the STCW Code. Master is one of the two licensed GMDSS operators as per Minimum Safe Manning and is unable to explain MF/HF system. MF/HF system had error screen that captain could not explain. System was not being used or tested during sea watches.

**01117 - International Oil Pollution Prevention (IOPP)**

Every ship of 400 gross tonnage and above shall be subject to an annual survey within three months before or after each anniversary date of the certificate, including a general inspection of the structure, equipment, systems, fittings, arrangements and material referred to in paragraph 1.1 of this regulation to ensure that they have been maintained in accordance with paragraphs 4.1 and 4.2 of this regulation and that they remain satisfactory for the service for which the ship is intended. Oily Water Separator does not have an overboard discharge line IAW the equipment manual and posted diagrams. The discharge line IAW the equipment manual and posted diagrams. The discharge pipe has been cut away and the overboard line is block off just past the three way valve. This arrangement has been in place since at the latest 16 JUNE 2018, when the Chief Engineer joined the ship. IOPP was endorsed on 21 AUG 2018 with the equipment in this condition.

**01315 - Oil record book**

The Oil Record Book Part I shall be completed whenever collection and disposal of oil residues takes place on the ship. Chief Engineer is not logging the collection or disposal of oil residues from the Sludge or Bilge Tanks. Chief Engineer presented PSCOs with receipts for sludge offloads and fuel bunkering that had no corresponding entries in Oil Record Book. Quantities listed for Sludge/oil water removal from tanks on 14SEPT2018 exceeds the capacity of tanks and could not be clearly explained by the Chief Engineer.

**14104 - Oil filtering equipment**

Oil filtering equipment referred to shall be of a design approved by the Administration and shall be such as will ensure that any oily mixture discharged into the sea after passing through the system has an oil content not exceeding 15ppm. Chief Engineer is the sole licensed Engineer onboard and could not demonstrate proper operation of the oil filtering equipment. The system has no overboard discharge. The pipe leading overboard from the 3 Wave Valve has been removed. Chief Engineer states that the system has had this arrangement since June 2018 when he joined.

**14110 - Standard disch. conn.**

To enable pipe of reception facilities to be connected with the ship's discharge pipeline for residues from machinery bilges and from oil residue sludge tanks, both lines shall be fitted with a standard discharge connection in accordance with the following table IOPP states that vessel is fitted with a standard discharge connection. Chief Engineer could not locate the connection. Due to lack of transfer procedures there is no clearly established method of removing oil residues from the ship.

**14607 - Quality of fuel oil**

The Sulphur content of fuel oil referred to in paragraph 1 and paragraph 4 of this regulation shall be documented by its supplier as required by regulation 18 of this Annex. Vessel could not produce documented Sulphur content for 9,000 GAL of fuel received on 8/21/2018.

**14604 - Bunker delivery notes**

The bunker delivery note shall be accompanied by a representative fuel sample that is to be sealed and designed by the suppliers' representative and the master or officer in charge of the bunker operation and retained for a period of not less than 12 months. Vessel only has a fuel oil sample from its most recent bunker delivery on 7DEC2018. No other samples could be provided.

**07103 - Division - decks,bulkheads and penetrations**

"A" Class Divisions are those divisions formed by bulkhead and decks which comply with the following: Shall be so constructed as to be capable of preventing the passage of smoke and flame up to the end of the one-hour standard fire test. "A" class boundary leading from steering space into engine room has a penetrating that is not properly sealed. "A" Class boundaries identified on Fire Control Plan have "MANUAL CLOSING STEEL DOORS" in those boundaries per the fire control plan. These Doors in the "A" Class boundaries identified in Fire Control Plan "MANUAL CLOSING STEEL DOORS" in those boundaries per the fire control plan.

**07122 - Fire control plan**

In any cargo ship, there shall be permanently exhibited for the guidance of the ships[s officers general arrangement plans showing clearly for each deck the control stations, the various fire sections enclosed by fire-resistant bulkheads. Fire Control Plan on board identifies "A" class boundaries. Vessel unable to provide documentation to PSCO to verify if the door was of "A" Class construction.

**07114 - Remote Means of control (opening,pumps,ventila**

Every oil fuel suction pipe from the storage settling or daily service tank shall be fitted with a cock or valve capable of being closed from outside the space concerned into the event of a fire arising in the space in which such things situated. Remote Fuel Oil shut off valve to emergency generator is inoperable.

**01105 - Cargo Ship Safety (including exemption)**

The annual survey shall include a general inspection of the equipment referred to in paragraph (b) (i) to ensure that it has been maintained in accordance with regulation 11 (a) and that it remains satisfactory for the service for which the ship is intended. 9GHz Radar was reported by previous Captain to be inoperable on 09APR2017. Annual survey was conducted in August of 2018 wit no changes or remarks about inoperable radar. Class Surveyor signed certificate confirming equipment on board was operational when Non-conformity state it has been inoperable since 09Apr2017. During exam PSCO observed radar inoperable.

**01105 - Cargo Ship Safety (including exemption)**

After any survey of the ship under regulations 7, 8, 9, or 10 has been completed, no change shall be made in the structural arrangements, machinery, equipment and other items covered by the survey, without the sanction of the Administration. Vessel added additional navigation equipment that act as the primary source of navigation on board, including non-SOLAS approved GPS equipment intended for use on recreational vessels. The safety equipment certificate has not been updated to reflect current navigational equipment onboard the vessel.

**10103 - Radar**

All Ships of 300 gross tonnage and upward shall be fitted with : a 9 GHz radar, or other means, to determine and display the range and bearing of radar transponders and of other surface craft, obstructions, buoys, shorelines and navigational marks to assist in navigation and in collision avoidance. Vessel's 9 GHz radar is inoperable.

**10113 - Automatic Identification System (AIS)**

All Ships of 300 gross tonnage and upwards engaged on international voyages shall be fitted with an automatic identification (AIS). Vessel's AIS was inoperable and not able to be used for navigation. PSCO observed error list displaying system faults for vessels heading and vessel's inability to transmit information.

**10111 - Charts**

Nautical charts and nautical publications, such as sailing directions, lists of lights, notices to mariners, tide tables, and all other nautical publications necessary for the intended voyage, shall be adequate and up to date. Paper charts on board used for current voyages were not corrected and old editions of publications were being used on board.

**05115 - Radio log (diary)**

A record shall be kept, to the satisfaction of the Administration and as required by the Radio Regulations, of all incidents connected with the radio communication service which appear to be of importance to safety of life and sea. GMDSS logbook is not being filled out sufficiently by Master or Chief Officer.

**01108 - Load Lines (including Exemption)**

All Ships, irrespective of size shall have: a properly adjusted standard magnetic compass, or other means, independent of any power supply, to determine the ship's heading and display the reading at the main steering positions. Ship's magnetic compass is unable to be displayed from the main steering position due to an inoperable light.

**10136 - Establishment of working language onboard**

On all ships a working language shall be established and recorded in the ship's logbook. Each seafarer shall be required to understand and, where appropriated, give order and instructions and to report back in that language. The established working language on board is English. During examination, it was necessary for the PSCO to speak to the Chief Engineer in Spanish in order to conduct the exam. PSCO was unable to communicate with multiple members of the crew because they did not speak the working language of the vessel. A Translator was required for the Master to communicate to the crew to pass orders and direction during the drill. Not all members of the crew speak or understand the working language of the vessel.

Ship Name: **ECO SPLENDOR**

Ship Type: **Bulk Carrier**

Flag: **Hong Kong**

IMO Number: **9659189**

Date of Action: **7/16/2019**

Action Taken: **Detention**

Port: **Portland, Oregon**

Unit: **Sector Columbia River**

Recognized Org: **American Bureau of Shipping**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Not Class Related**

Relevant Certificates:

Organization Related  
to Detention:

Ship Management: Owners, Operators, or Managers  
**ISM Ship Management PTE LTD.**

**Continent Maritime SA**

Charterers

**Canpotex International Pte Limited**

Deficiencies: Code - Category

**15106 - Shipboard operations**

Description

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 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. The vessel's crew failed to report non-conformities of critical items and function IAW chapter 9 of the their SMS as indicated by deficiency #2. It is recommended that an external third party audit of the SMS be completed with regard to deficiency #2.

**13199 - Other (machinery)**

The machinery, boilers and other pressure vessels, associated piping systems and fittings shall be of a design and construction adequate for the service for which they are intended and shall be so installed and protected as to reduce to a minimum any danger to person on board, due regard being paid to moving parts, hot surfaces and other hazards. The design shall have regard to materials used in constructions, the purpose for which the equipment is intended, the working conditions to which it will be subjected and the environmental conditions on board. Temporary repairs were found in the following spaces: Piping for the Fire/Ballast/Bilge pump has two temporary repairs; one repair has failed and is actively leaking. Seawater cooling pump piping has a failed, leaking temporary patch main engine cooling line has one temporary repair. Main engine heat exchanger seawater piping has two temporary repairs. The freshwater generator has two temporary repairs and one pinhole leak. Generator heat exchanger has two temporary repairs.



Ship Name: **ELKA SIRIUS**

Ship Type: **Chemical Tankship**

Flag: **Liberia**

IMO Number: **9234513**

Date of Action: **8/29/2019**

Action Taken: **Detention**

Port: **Corpus Christi, Texas**

Unit: **Sector Corpus Christi**

Recognized Org: **American Bureau of Shipping**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Not Class Related**

Relevant Certificates:

Organization Related  
to Detention:

Ship Management: Owners, Operators, or Managers  
**European Product Carriers**  
**Alista Maritime Inc**  
Charterers  
**Valero Marketing & Supply Company**

Deficiencies: Code - Category

**07102 - Inert gas system**

**12107 - Fire protection cargo deck  
area**

**07105 - Fire doors/openings in fire-  
resisting division**

Description

The inert gas system shall be capable of delivering inert gas with an oxygen content of not more than 5% by volume in the inert gas supply main to the cargo tanks at any required rate of flow. PSCO observed crew unable to calibrate the oxygen sensor. Crew did not follow SMS procedures for calibration of the oxygen sensor, and was unfamiliar with proper calibration. IGG was unable to operate continuously, system shut down multiple times during operation. PSCO unable to verify proper operation of the IGG.

Where cables which are installed in hazardous areas introduce the risk of fire or explosion in the event of an electrical fault in such areas, special precautions against such risks shall be taken to the satisfaction of the Administration. All electrical lines piping, and fittings of the tank gauging system, installed on deck, were found with soft patches, flex piping, and exposed wires throughout the system. All electrical connections to the pressure sensors install on the cargo lines at the tank top are sealed with silicone and loose. Electrical cable line found with soft patches, broke bonding, and loose connections on expansion joint throughout the system. Emergency lighting forward of accommodation found with loose wiring connections.

The fire resistance of doors shall, as far as practicable, be equivalent to that of the division in which they are fitted. Doors and door frame in "A" class divisions shall be constructed of steel. Doors fitted in boundary bulkheads of machinery spaces of category A shall be reasonably gastight and self-closing. The following "A" class fire doors were found with gaps in the framing, holes, and missing latches or locks: Both fire doors leading to Engine Control room, door leading from engine room to steering gear room, door leading from "A" deck to engine room, door from "A" deck to foam station, door from "A" deck to electrical equipment room, door from "A" deck to cargo valve control room, door from "A" deck to the stairway.



**15111 - Company verification,  
review and evaluation**

**Objective evidence discovered in an expanded ISM exam revealed the following major non-conformity; the vessel failed to fully implement the requirements of the SMS as evident by def. #01, #02, and #03. An external audit is required.**

Ship Name: **ERIKOUSSA**

Ship Type: **Bulk Carrier**

Flag: **Liberia**

IMO Number: **9291092**

Date of Action: **12/10/2019**

Action Taken: **Detention**

Port: **Baltimore, Maryland**

Unit: **Sector Maryland-NCR**

Recognized Org: **DNV GL MARITIME**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Not Class Related**

Relevant Certificates:

Organization Related  
to Detention:

Ship Management: Owners, Operators, or Managers

**Dileton Maritime S.A.**

**Erikoussa Maritime S.A.**

Charterers

**Nordic Bulk Carriers A/S**

Deficiencies: Code - Category

**07106 - Fire detection and alarm  
system**

Description

**Fire Detection and fire alarm systems shall be kept in good order so as to ensure their required performance if a fire occurs. The smoke and flame detectors above the #1 F/O purifier were covered by crew for 9 days following 01Dec19 maintenance on the #1 F/O purifier to avoid nuisance alarms.**

**04102 - Emergency fire pump and its  
pipes**

**The total suction head and net positive suction of the emergency fire pump shall be determined considering pump capacity and hydrant pressure under all conditions of list, trim, roll, and pitch likely to be encountered in service. Emergency fire pump had to be manually primed by ships crew to attain suction while in ballasted condition.**

**07126 - Oil accumulation in engine  
room**

**Means shall be provided to control leaks of flammable liquids. Fuel oil leaks were observed on F/O transfer pump, F/O valve to #4 F/O tank, and main engine, with excessive oil found in the bilge astern of the main engine and below the F/O transfer pump. Lagging in vicinity of leaks found oil soaked.**



Ship Name: **EUPEN**  
Ship Type: **LPG Gas Carrier**  
Flag: **Belgium**

IMO Number: **9177806**

Date of Action: **9/28/2019**

Action Taken: **Detention**

Port: **Houston, Texas**

Unit: **Sector Houston-Galveston**

Recognized Org: **Lloyd's Register**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Not Class Related**

Relevant Certificates:

Organization Related  
to Detention:

Ship Management: Owners, Operators, or Managers  
**Exmar Shipmanagement NV**  
**Exmar Shipping BVBA**  
Charterers  
**Petredec Europe Limited**

Deficiencies: Code - Category

**15105 - Resources and personnel**

Description

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 it's 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

action taken. An additional external verification of the vessels SMS, focusing on company procedures regarding resources, personnel, and maintenance of the ship is required.

**02108 - Electrical installations in general**

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.

**06199 - Other (cargo)**

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.

**06107 - Cargo operation**

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.

Ship Name: **EVRIDIKI**

Ship Type: **Oil Tankship**

Flag: **Liberia**

IMO Number: **9318137**

Date of Action: **3/11/2019**

Action Taken: **Detention**

Port: **Philadelphia, Pennsylvania**

Unit: **Marine Safety Detachment Lewes**

Recognized Org: **DNV GL MARITIME**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Not Class Related**

Relevant Certificates:

Organization Related  
to Detention:

Ship Management: Owners, Operators, or Managers  
**Liquimar Tankers Management, Inc**  
**Evridiki Navigation Inc**  
Charterers  
**Blue Fin Tankers Inc**

Deficiencies: Code - Category

**14104 - Oil filtering equipment**

Description

**Oil filtering equipment shall be of a design approved by the administration and shall be such as will ensure that any oily mixture discharged into the sea after passing through the system has an oil content not exceeding 15 ppm. Upon conducting an operational test of the oily water separator in accordance with procedures outlined in Marine Safety Manual Vol II, the effluent being processed would not go below 15 ppm on the oil content meter. The system was ran by the crew intermittently for over an hour, and at no time, while the system sampled effluent could the system produce an effluent below 15 ppm.**

**15101 - Safety and environment  
policy**

**The company and the ship shall comply with the requirements of the ISM Code. The company should establish a safety and environmental protection policy. The company should ensure that the policy is implemented and maintained at all levels of the organization, both ship-based and shore-based. Posted instructions for operating the ship's oily water separator (OWS) state "Open the sampling water inlet valve to the sensing unit for the 15 PPM alarm". PSCO observed that during testing of the OWS and the Oil Content Meter (OCM) the crew was unable to demonstrate proper operation of the system. The sample inlet valve from the OWS was secured by the ship's crew thereby simulating 0 PPM of oil in the discharge effluent and allowing for an overboard discharge of unmonitored oily bilge water. When the sample valve inlet was opened, the OCM immediately sensed an oil content above 15 PPM and alarmed.**

Ship Name: **EXEMPLAR**

Ship Type: **LNG Gas Carrier**

Flag: **Belgium**

IMO Number: **9444649**

Date of Action: **8/19/2019**

Action Taken: **Detention**

Port: **Boston, Massachusetts**

Unit: **Sector Boston**

Recognized Org: **Bureau Veritas**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Not Class Related**

Relevant Certificates:

Organization Related  
to Detention:

Ship Management: Owners, Operators, or Managers  
**Exmar Shipmanagement NV**  
**Exemplar LLC**

Deficiencies: Code - Category  
**09213 - Gas instruments**

Description  
**Gas detection equipment acceptable to the Administration and suitable for the gases to be carried should be provided in accordance with column f in the table of chapter 19. When PSCO requested to test fixed gas detection, crew applied 60% LEL methane span gas. System read 107%, 32%, and 54% on the entrance to accommodation space D deck, GVU room, and the boiler fuel double pipe 1 fixed gas sampling points, respectively, of 04 sampling points, tested on GS3000 panel.**

Ship Name: **FAMILY ISLAND**

Ship Type: **General Dry Cargo Ship**

Flag: **Tanzania**

IMO Number: **7637345**

Date of Action: **10/9/2019**

Action Taken: **Detention**

Port: **Miami, Florida**

Unit: **Sector Miami**

Recognized Org: **CONARINA**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Not Class Related**

Relevant Certificates:

Organization Related  
to Detention:

Ship Management: Owners, Operators, or Managers  
**Marine Sale and Trading, S.A.**  
**Caribbean Ship Services**

Deficiencies: Code - Category

**01107 - Safety Management  
Certificate (SMC/ ISM)**

Description

**Objective evidence discovered during an expanded ISM exam revealed the following nonconformities: The vessel failed to fully implement the requirements of the ISM Code through their SMS procedures as evident by the following deficiencies indicating that the ship and/or company are not meeting the SMS requirements. Recommend an external audit.**

**In meeting these requirements, the company should ensure that inspections are held at appropriate intervals, any non-conformity is reported, and records of these activities are maintained. The ships weekly test and inspections for rescue boat, life rafts, and general alarm have not been conducted since September 05, 2019. The ships monthly test and inspection of life-saving appliances, firefighting appliances, emergency fire pump, and emergency generator last conducted August 30, 2019. Quarterly inspections have not been conducted since March 2019.**

**Section A 11 of the company's SMS procedures require pressure testing of CO2 bottles for fixed firefighting systems every 5 years. The ship's fixed CO2 system bottles were pressure tested hydrostatically in July 2009, as indicated by the bottle markings. No non-conformity report was made.**

**The company's SMS requires the vessel to conduct and record monthly fire and abandon ship drills and bimonthly enclosed space entry drills. No fire and abandon ship drill conducted in September. No enclosed space entry drill conducted since March 2019**

**01113 - Minimum Safe Manning  
Document**

**Deficiencies which may be deemed to pose a danger to persons, property or the environment includes failure to comply with the applicable safe manning requirements of the Administration. The vessel has no Chief Mate on board the vessel as required by the minimum safe manning document. The Captain indicated the vessel has not had a Chief Mate since September 12, 2019.**





Ship Name: **FLAGSHIP LOTUS**

Ship Type: **Oil Tankship**

Flag: **Marshall Islands**

IMO Number: **9321184**

Date of Action: **4/5/2019**

Action Taken: **Detention**

Port: **Houston, Texas**

Unit: **Sector Houston-Galveston**

Recognized Org: **DNV GL MARITIME**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Not Class Related**

Relevant Certificates:

Organization Related  
to Detention:

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

Charterers  
**Equinor ASA**

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 from the OWS discharge was closed, resulting in no flow through 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.

#### **01315 - Oil record book**

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 following 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 the 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 tank as 8.2 cubic meters and 5.0 cubic meters, respectively. The quantity listed in the 03MAR2019 soundings logs are 14.0 cubic meters and 15.1 cubic meters, respectively.

#### **07126 - Oil accumulation in engine room**

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 oil in multiple locations in engine room, most notably on top of the Heavy Fuel Oil service tank, waste oil settling tanks No. 1 and NO. 2, and waste oil service tank.

Ship Name: **FMT KNIDOS**

Ship Type: **Chemical Tankship**

Flag: **Malta**

IMO Number: **9544683**

Date of Action: **3/21/2019**

Action Taken: **Detention**

Port: **Port Arthur, Texas**

Unit: **MSU Port Arthur**

Recognized Org: **Bureau Veritas**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Not Class Related**

Relevant Certificates:

Organization Related  
to Detention:

Ship Management: Owners, Operators, or Managers  
**M.T.M. Ship Management Pte. Ltd.**  
**Mysia Shipping Ltd**

Deficiencies: Code - Category  
**09209 - Electrical**

**11101 - Lifeboats**

**15101 - Safety and environment  
policy**

Description

**Electrical equipment , cables and wiring shall not be installed in the hazardous locations unless it conforms with standard acceptable to the Organization. Numerous lights located in the hazardous location on deck have exposed wiring, or have water inside the fixtures; so they are no longer safe for use.**

**Chemical tankers and gas carriers carrying cargo emitting toxic vapors or gas shall carry, in lieu of totally enclosed lifeboats complying with the requirements of section 4.6 of the code, lifeboats with a self-contained air support system complying with the requirements of section 4.8 of the code. During an operational test, there is an uncontrollable leak between the air cylinder and regulator rendering the require pressure unverifiable. Additionally, the vessel does not have the correct adapter necessary for filling the air cylinders.**

**Objective evidence discovered during an expanded ISM exam revealed the following nonconformities: The vessel failed to fully implement the requirements of the ISM Code through their SMS procedures as evident by the above deficiencies, indicating that the ship and/or company are not meeting the SMS requirement. Recommend external audit.**

**No. 1 - In meeting these requirements, the company should ensure that: inspections are held at appropriate intervals, any non-conformity is reported, with its possible cause , if known; corrective action is taken; and records of these activities are maintained. The vessel's crew logged that maintenance has been performed on deck lighting in hazardous areas, lifeboat compressed air system, ballast tank fixed hydrocarbon gas detection system, the nitrogen systems, and OSME; however, during an expanded examination those systems on board displayed signs of long lasting, lack of preventative maintenance and/or are inoperable.**



Ship Name: **FUKUICHI MARU NO. 112**

Ship Type: **Other**

Flag: **Japan**

IMO Number: **9009736**

Date of Action: **4/1/2019**

Action Taken: **Detention**

Port: **Apra, Guam**

Unit: **Sector Guam**

Recognized Org: **Not Classed**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Not Class Related**

Relevant Certificates:

Organization Related  
to Detention:

Ship Management: Owners, Operators, or Managers  
**Fukuichi Gyogyo KK**

Deficiencies: Code - Category

**01315 - Oil record book**

Description

**The Oil Record Book (ORB) Part I shall be completed on each occasion, whenever any of the following machinery space operations take place on the ship: collection and disposal of oil residues (Sludge and other oil residues). The vessel's ORB Part I is missing required entries for collection and disposal of oil residues.**

**01315 - Oil record book**

**The Oil Record Book (ORB) Part I shall be completed on each occasion, whenever any of the following machinery space operations take place on the ship: discharge overboard or disposal of bilge water in machinery spaces. The vessel's ORB Part I is missing required entries for disposal of bilge water.**

**01315 - Oil record book**

**The Oil Record Book (ORB) Part I shall be completed on each occasion, whenever any of the following machinery space operations take place on the ship: bunkering of fuel or bulk lubricating oil. The vessel's ORB Part I does not have entries for bunkering of fuel or lube oil.**

**01315 - Oil record book**

**Each operation shall be fully recorded without delay in the Oil Record Book Part I. Entries required in ORB Part I were not logged as required without delay.**

**01315 - Oil record book**

**The entries in the ORB Part I shall be at least in English, French or Spanish. No entries in ORB Part I have translations in English, French or Spanish.**

**01320 - Garbage record book**

**Each discharge operation shall be recorded in the Garbage Record Book (GRB) and signed for by the officer in charge. Entries for categories other than food waste are not being recorded in vessel's GRB.**

**01320 - Garbage record book**

**The entry for each discharge shall include date & time, position of the ship, description of the garbage and estimated amount discharged. GRB does not contain required entry information.**

**01320 - Garbage record book**

**The entries in the GRB shall be at least in English, French or Spanish. Entries in vessel's GRB do not have translations in English, French or Spanish.**

**14104 - Oil filtering equipment**

**Oil filtering equipment shall be such as will ensure that any oily mixture discharged into the sea after passing through the system has an oil content not exceeding 15 ppm. C/E could not prove OWS proper operation ensuring oil content discharged did not exceed 15 ppm.**

**14101 - Control of discharge**

Any discharge into the sea of oil or oily mixtures from ships of 400 GT and above shall be prohibited except when all the following conditions are satisfied. The vessel did not meet the condition of ensuring the oil content effluent without dilution does not exceed 15 ppm when discharged into the sea on occasions as admitted to by Chief Engineer.

**01320 - Garbage record book**

Every ship of 400 GT and above shall carry a garbage management plan which the crew shall follow. Designated person in charge failed to follow the garbage management plan in regards to logging required entries in the garbage record book.





Ship Name: **GAS ALKHALEEL**

Ship Type: **LPG Gas Carrier**

Flag: **Panama**

IMO Number: **9385685**

Date of Action: **11/3/2019**

Action Taken: **Detention**

Port: **Galveston, Texas**

Unit: **Sector Houston-Galveston**

Recognized Org: **Lloyd's Register**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Not Class Related**

Relevant Certificates:

Organization Related  
to Detention:

Ship Management: Owners, Operators, or Managers

**Arab Maritime Petroleum Transport Compan**

Charterers

**Petreddec**

Deficiencies: Code - Category

**09213 - Gas instruments**

Description

A permanently installed system of gas detection and audible and visual alarms should be provided for other enclosed spaces in the cargo area where vapor may accumulate including hold spaces and interbarrier spaces for independent tanks other than type [13.6.7]. For spaces listed in 13.6.7, alarms should be activated for flammable products when the vapour concentration reaches 30% of the lower flammable limit [13.3.10].

When testing the fixed gas detection for the cargo tank hold spaces, crewmember supplied 50% LEL propane test gas directly to the catalytic gas sensor and the digital LEL readout stabilized at 24% LEL. Crewmembers then tried carrying out tests from different hold space sampling lines and internal gas cabinet sampling line with no successful LEL readings on the display.

**15105 - Resources and personnel**

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.

While carrying out tests of the cargo tank high pressure alarms, the crew did not use the appropriate hand pump [Yokogawa BT200] as required by ship's established SMS [Ship work order/requisition form No:3011893 dated 20-10-2019]. While testing, the crew seemed unfamiliar with how to use the test equipment and instead used a bottle with compressed nitrogen to carry out local tests.

**15105 - Resources and personnel**

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.

The vessel documented deck water spray system testing and servicing on 07 Oct 2019 and 31 Oct 2019. While testing during the COC examination, PSCOs observed inadequate coverage on over 50% of the water spray system including the number 2/3/4 cargo tank domes, port/starboard manifolds, forward of the compressor room and over the cargo booster pumps and vaporizer.

**15105 - Resources and personnel**

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.

When questioned about the ship's procedures for carrying out tests of the fixed gas detection, the ship's crew informed the PSCOs that there were no written procedures for carrying out tests. When asked to test the fixed gas detection, the crew was not following any written procedures.

**06199 - Other (cargo)**

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 vapour 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 COC examination, PSCOs observed inadequate coverage on over 50% of the water spray system including the number 2/3/4 cargo tank domes, port/starboard manifolds, fwd of the compressor room and over the cargo booster pumps and cargo vaporizer.



Ship Name: **GENCO NORMANDY**

Ship Type: **Bulk Carrier**

Flag: **Marshall Islands**

IMO Number: **9347877**

Date of Action: **7/17/2019**

Action Taken: **Detention**

Port: **New York, New York**

Unit: **Sector New York**

Recognized Org: **DNV GL MARITIME**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Not Class Related**

Relevant Certificates:

Organization Related  
to Detention:

Ship Management: Owners, Operators, or Managers  
**Wallem Shipmanagement Limited**  
**Genco Ship Management LLC.**  
**Genco Normandy Limited**

Charterers  
**Titan Cement**

Deficiencies: Code - Category

**11101 - Lifeboats**

**07110 - Fire fighting equipment and  
appliances**

**10114 - Voyage data recorder  
(VDR)/Simplified Voyage data  
recorder(S-VDR)**

**09232 - Cleanliness of engine room**

Description

**Before the ship leaves port and at all times during the voyage, all life saving appliances shall be in working order and ready for immediate use. While lowering the starboard lifeboat, it was observed that the remote control/brake release line had previously become unbraided/broke and was spliced back together.**

**Fire fighting systems and appliances shall be kept in good working order and readily available for immediate use. Fire hose boxes on deck were observed in poor condition and not able to be opened or closed properly due to broken latches. Additionally, 02 fire hose boxes were observed with the fire hose missing and the forward fire box is missing the nozzle.**

**To assist in casualty investigations, ships when engaged on international voyages, subject to the provisions [of regulation]  
1.4 shall be fitted with a voyage date recorder (VDR) as follows: Ships other than passenger ships , of 3,000 gross tonnage and upwards constructed on or after 1 July 2002. Voyage date recorder (VDR) not connected to the ECDIS or the echo sounder. When the above mention devices are turned off no VDR alarm is present.**

**Provisions shall be made to facilitate cleaning, inspection and maintenance of main propulsion and auxiliary machinery. Excessive collections of fuel oil were observed around the main engine due to leaking fuel injectors. Pooled oil was observed in purifier room around purifiers and stored in a bucket. Excessive oil was found in the bilge underneath the shaft seal.**

**15109 - Maintenance of the ship and equipment**

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.

The crew lowered the starboard lifeboat and maneuvered it the water on 24JUN19. They identified the remote control/brake release wire [was] broken. The crew spliced the wire together and did not report to company or class. Also, multiple fire boxes are in poor condition, unable to open or close properly or are missing the fire hose or nozzle. The 3/O, C/O, and Master all reported the items in good condition during the monthly LSA/FSS inspection. The excessive oil in the engine room is due to a lack of maintenance. The crew identified multiple maintenance items, but have made no attempt to rectify the problems. On 20JUN19, the crew identified M/E cylinder #1 piston ring is broken but have yet to replace it. An ISM audit is recommended.

Ship Name: **HANTON TRADER II**

Ship Type: **Bulk Carrier**

Flag: **Philippines**

IMO Number: **9691424**

Date of Action: **1/23/2019**

Action Taken: **Detention**

Port: **New Orleans, Louisiana**

Unit: **Sector New Orleans**

Recognized Org: **Bureau Veritas**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Class Related**

Relevant Certificates: **Safety Equipment**

Organization Related  
to Detention: **Bureau Veritas**

Ship Management: Owners, Operators, or Managers  
**Victoria Ship Management, Inc.**

Charterers  
**Western Bulk AS**

Deficiencies: Code - Category

**11104 - Rescue boats**

Description

Before a ship leaves port and at all times during the voyage all life saving appliances shall be in working order and ready for immediate use. PSCO observed rescue boat inoperable. Further investigation indicates that the rescue boat has been inoperable since at least September 2018.

**15110 - Documentation-ISM**

As far as is reasonable and practicable, rescue boats other than life boats which are also rescue boats, shall be launched each month with their assigned crew aboard and maneuvered in the water. In all cases this requirement shall be complied with at least once every three months. Documentation collected from the master of the vessel indicated that the last launch and recovery of the rescue boat was conducted in November 2018. However, after further investigation the PSCO identified the documentation presented for the November 2018 launch and recovery of the rescue boat was modified with corrective fluid. The documentation provided was actually from July 2018.

**15108 - Reports of non-conf.,  
accidents & hazardous occur.**

In meeting the requirements of clause 10.1 of the ISM Code for the maintenance of the ship and equipment, the company should ensure that: (1) Inspections are held at appropriate intervals. (2) Any non conformity is reported. (3) Appropriate corrective action is taken. PSCO believes, in reference to deficiency 001, the master failed to implement any of the requirements of this clause as specified in vessel's safety management system. Recommend an additional ISM verification audit.

**15107 - Emergency preparedness**

The company should establish programs for drills and exercises to prepare for emergency actions. PSCO believes, in reference to deficiency 002, the master failed to conduct necessary exercises related to essential life saving equipment in accordance with the requirements set out in the vessel's safety management system. Recommend an additional ISM verification audit which may be combined with the additional ISM verification audit requested in deficiency 0003.

Ship Name: **HC BEA LUNA**

Ship Type: **General Dry Cargo Ship**

Flag: **Antigua and Barbuda**

IMO Number: **9235488**

Date of Action: **3/17/2019**

Action Taken: **Detention**

Port: **New Orleans, Louisiana**

Unit: **Sector New Orleans**

Recognized Org: **RINA Services S.p.A.**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Not Class Related**

Relevant Certificates:

Organization Related  
to Detention:

Ship Management: Owners, Operators, or Managers

**"HC Bea-Luna" Schiffahrts UG  
(Haftungsbeschränk) &**

**IMM Shipping GmbH & Co. KG**

Charterers

**IMM Bea-Luna Ltd**

Deficiencies: Code - Category

**11101 - Lifeboats**

**15102 - Company responsibility and  
authority**

Description

**Before the ship leaves port at all times during the voyage, all life-saving appliances shall be in working order and ready for immediate use. PSCO found both independent rechargeable energy sources discharged and unable to start life boat engine. Second rechargeable energy source has been identified as inoperable since Feb 2019. Maintenance records indicate that the lifeboat engine has not been started since 16 Feb 2019.**

**Objective evidence discovered in an expanded ISM exam revealed the following non-conformity; the vessel failed to fully implement the requirements of the SMS as evident by deficiency #01. An external audit is recommended.**

Ship Name: **HONOURABLE HENRY JACKMA**

Recognized Org: **Lloyd's Register**

Ship Type: **Bulk Carrier**

Recognized Security  
Organization (RSO):

Flag: **Bahamas**

IMO Number: **7926174**

Recognized Org  
(RO) Related: **Not Class Related**

Date of Action: **3/1/2019**

Relevant Certificates:

Action Taken: **Detention**

Organization Related  
to Detention:

Port: **San Francisco, California**

Unit: **Sector San Francisco**

Ship Management: Owners, Operators, or Managers  
**Algoma Ship Tech Ltd**

Charterers  
**CSL International Inc.**

Deficiencies: Code - Category

Description

**99101 - Other (Safety in general)**

The condition of the ship and its equipment shall be maintained to conform with the provision of the convention and the protocol to ensure that the ship in all respect will remain fit to proceed to sea without danger to the ship or person onboard. Heavy exhaust discharge from main engine within the engine room was witnessed by the PSC team during ignition and transition between ahead and astern propulsion. Both PSCOs 4-gas detectors alarmed when entering the vicinity of the main engine. Approximately 40% of the E/R overhead space is covered in the exhaust residue. Crew noticed that this has been a reoccurring issue for the past 2 months. Required that the vessel supply a marine chemist to gas free the space to ensure that the space is safe for work.

**07126 - Oil accumulation in engine room**

The condition of the ship and its equipment shall be maintained to conform with the provision of the convention and the protocol to ensure that the ship in all respect will remain fit to proceed to sea without danger or the ship or persons onboard. 03 different sections of the bilge were found with thick waste oil accumulation. Locations of oily bilge water included; underneath the shaft, ports side of the main engine beneath a leaking drain pipe, and through the area around the lube oil purifier section of the engine room. Specifically, the area around the shaft was approximately 3 feet deep with oily water. The crew attempted to remove the majority of oil from the bilge.



Ship Name: **IGLC ANKA**

Ship Type: **LPG Gas Carrier**

Flag: **Panama**

IMO Number: **9666663**

Date of Action: **11/4/2019**

Action Taken: **Detention**

Port: **Houston, Texas**

Unit: **Sector Houston-Galveston**

Recognized Org: **American Bureau of Shipping**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Not Class Related**

Relevant Certificates:

Organization Related  
to Detention:

Ship Management: Owners, Operators, or Managers  
**Negmar Denizcilik Yatirim A.S.**  
**IGLC Anka Shipping Investment S.A.**  
Charterers  
**Vitol Inc**

Deficiencies: Code - Category

**06105 - Atmosphere testing  
instruments**

Description

The gas detection equipment should be capable of sampling and analyzing for each sampling head location sequentially at intervals not exceeding 30 mins, except that in the case of gas section for the ventilation hoods and gas duct referred to in 13.6.7.6 sampling should be continuous. Common sampling lines to the detection equipment should not be fitted.

Witnessed crew testing fixed gas detection using 1.1% by volume propane (50% LEL). The cabinet registered a maximum value of 02% by volume (10% LEL). The cabinet cannot accurately measure the sample gas being introduced into the system

**12107 - Fire protection cargo deck  
area**

The system should be capable of covering all area mentioned in 11.3.1 with a uniformly distributed water-spray of at least 10 l/m2 per minute for horizontal projected surfaces and 4 l/m2 per minute for vertical surfaces.

The water spray system coverage was not adequate. The #1 cargo tank had no coverage, the deck tank had 50% coverage, and the port and starboard manifolds only had 66% coverage.

Ship Name: **IKAN SELIGI**

Ship Type: **Bulk Carrier**

Flag: **Panama**

IMO Number: **9479058**

Date of Action: **1/30/2019**

Action Taken: **Detention**

Port: **Vancouver, Washington**

Unit: **Sector Columbia River**

Recognized Org: **Nippon Kaiji Kyokai**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Not Class Related**

Relevant Certificates:

Organization Related  
to Detention:

Ship Management: Owners, Operators, or Managers  
**Ever Bright Shipping S.A.**

**KISM PTE LTD**

Charterers

**Oldendorff Carriers**

Deficiencies: Code - Category

**15109 - Maintenance of the ship and  
equipment**

**14101 - Control of discharge**

**07113 - Fire pumps and its pipes**

Description

The company should establish procedures for the implementation of corrective action, including measures intended to prevent recurrence. Objective evidence during the expanded ISM exam revealed that the vessel's company is not taking corrective action on long-standing non-conformities; vessel crew reported serious long-standing holes in the fire main to the company, but the company failed to implement corrective action to rectify the deficiency. Additionally, objective evidence during the expanded ISM exam revealed the vessel crew is not taking corrective action for major pollution non-conformity. The crew failed to report the inoperable three-way valve as described in deficiency 2. These deficiencies are objective evidence that the crew and company is not meeting the SMS requirements. It is recommended that an external third-party audit of the SMS be conducted regarding deficiencies 1-3.

The oil filtering equipment system shall be provided with arrangement to ensure that any discharge of oily mixtures is automatically stopped when the oil content of the effluent exceeds 15 PPM. The oily water separator three-way valve is seized in the open position preventing oily water greater than 15 PPM from recirculating back to storage slop tanks.

Fire fighting systems and appliances shall be kept in good working order and readily available for immediate use. Multiple steady leaks from holes and temporary patches were found on fire main piping located on the main deck.



Ship Name: **ILIA**  
Ship Type: **Bulk Carrier**  
Flag: **Liberia**

IMO Number: **9490650**

Date of Action: **11/21/2019**

Action Taken: **Detention**

Port: **Houston, Texas**

Unit: **Sector Houston-Galveston**

Recognized Org: **Nippon Kaiji Kyokai**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Not Class Related**

Relevant Certificates:

Organization Related  
to Detention:

Ship Management: Owners, Operators, or Managers  
**Aquamarine Seaway S.A.**

**White Sea Navigation**

Charterers

**Phaethon International Ltd.**

Deficiencies: Code - Category

**14108 - 15 PPM Alarm arrangmts.**

Description

Oil filtering equipment shall also be provided with arrangements to ensure that any discharge of oily mixtures is automatically stopped when the oil content of the effluent exceeds 15ppm. In considering the design of such equipment and approvals, the administration shall have regard to the specification recommended by the Organization.

To avoid willful manipulation of 15ppm bilge alarms, the 15ppm bilge alarms should be so constructed that the alarm is always activated whenever clean water is used for cleaning or zeroing purposes.

Port State Control Officers (PSCOs) identified faulty solenoid valve stuck in the open position on the fresh water line to the Oil Content Meter (OCM). During operational tests, the fresh water diluted the sample reading to zero PPM with open solenoid valve. The three-way valve remained in the open position, with no alarm activation, to overboard despite the OCM being actively flushed with fresh water for over twenty minutes. In its current condition, the OCM is unable to detect the oil concentration in the discharge effluent and does not prevent overboard discharge when the OCM is utilizing fresh water for cleaning or zeroing purposes.

**01315 - Oil record book**

Each operation described in paragraph 2 of this regulation shall be fully recorded without delay in the Oil Record Book Part I (ORB), so that all entries in the book appropriate to the operation are completed. Each completed operation shall be signed by the officer or officers in charge of the operations concerned and each completed page shall be signed by the master of the ship.

The ORB presented to the PSCOs had multiple discrepancies. Approximately eight additional cubic meters of bilge water was observed on board by PSCOs through soundings during the exam. According to the ORB entry on 20NOV2019 there was 9.2 m3 and the PSCOs observed soundings of 17.3 m3. Additionally, on 05NOV2019 the ORB entry sounding for the bilge tank was 10.6 m3 while the company provided daily tank sounding log states it was 6.3 m3. It was determined through crew statements and sounding logs that the presented ORB is not a true account of the handling of oily waste and bilge water on the ship.

**15101 - Safety and environment policy**

The company should ensure that the (safety and environmental) policy is implemented and maintained at all levels of the organization, both ship-based and shore-based.

PSCOs found several entries in the ORB that contradicted sounding logs (SMS - 7.4.5.3.7) and violated company environmental protection policy. The ship's last operation of OWS was on 12NOV19 at 1630 to 0352. Company policy on OWS operation (SMS - 7.6.6.5.7) clearly states that routine overboard discharges are prohibited except during daylight hours. That same policy also states prior to commencing the operation the Officer Of the Watch (OOW) must be advised and the position of the ship relative to land must be ascertained; the OOW is to record the position in the deck logbook. There were no entries of this operation recorded in the deck logbook. Furthermore, the operating instructions for the OWS do not specify proper valve alignment and checks to prevent pollution. As delineated in deficiencies #1 and #2 and in review of the ship's records, vessel has failed to fully implement functional requirements of a safety and environmental-protection policy. An external audit of the Safety Management System is required with a focus on environmental protection policies

Ship Name: **INDUSTRIAL CHARGER**

Ship Type: **Heavy Load Carrier**

Flag: **Portugal**

IMO Number: **9213959**

Date of Action: **4/10/2019**

Action Taken: **Detention**

Port: **Wilmington, North Carolina**

Unit: **Sector North Carolina**

Recognized Org: **DNV GL MARITIME**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Class Related**

Relevant Certificates: **Safety Equipment**

Organization Related  
to Detention: **DNV GL MARITIME**

Ship Management: Owners, Operators, or Managers  
**Interscan Schiffahrtsgesellschaft m.b.h**  
**Charger Interscan UG**

Charterers  
**MV "Charger" Shipping Company Ltd**

Deficiencies: Code - Category

**07109 - Fixed fire extinguishing  
installation**

**15102 - Company responsibility and  
authority**

Description

**Fire-fighting systems and appliances shall be kept in good working order and readily available for immediate use. Annual servicing of the fixed CO2 system was conducted on Aug 18, 2018 by a 3rd party servicing technician. The technician report indicated three (3) items "were found non conforming and require service" but servicing was not conducted. Those items include five (5) 45kg CO2 cylinders of main system for E/R and cargo holds needed recharging; the single 45kg CO2 cylinder for the EDG room needs replacing or reconditioning and the single 45kg CO2 cylinder for the paint locker was condemned for excess rust on bottom. Those items were not completed during servicing and PSCO found the cylinders for the EDG room and paint locker to have "condemned" stickers prominently placed on the cylinder.**

**The company is responsible for ensuring that adequate resources and shore based support are provided. The ship's captain sent a "request for repair/service" to company to rectify items found by servicing technician during annual servicing of the fixed CO2 system on Aug 18, 2018. Company responded by instructing the vessel to close the request and the items would be addressed during the "next annual verification".**

Ship Name: **JAKOB SELMER**

Ship Type: **Bulk Carrier**

Flag: **Marshall Islands**

IMO Number: **9474228**

Date of Action: **10/5/2019**

Action Taken: **Detention**

Port: **Baton Rouge, Louisiana**

Unit: **MSU Baton Rouge**

Recognized Org: **DNV GL MARITIME**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Not Class Related**

Relevant Certificates:

Organization Related  
to Detention:

Ship Management: Owners, Operators, or Managers  
**Oskar Wehr KG. (GMBH & Co.)**

**Jakob Selmer Shipping Limited**

Charterers

**Weco Bulk A/S**

Deficiencies: Code - Category

**11104 - Rescue boats**

Description

**Before the ship leaves port and at all times during the voyage, all life-saving appliances shall be in working order and ready for immediate use. PSCO observed the crew unable to start the rescue boat engine for over two hours.**

Ship Name: **KIRAN ANATOLIA**

Ship Type: **Bulk Carrier**

Flag: **Malta**

IMO Number: **9650171**

Date of Action: **9/9/2019**

Action Taken: **Detention**

Port: **Baltimore, Maryland**

Unit: **Sector Maryland-NCR**

Recognized Org: **Lloyd's Register**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Class Related**

Relevant Certificates: **Safety Construction**

Organization Related  
to Detention: **Lloyd's Register**

Ship Management: Owners, Operators, or Managers  
**Pasifik Gemi Isletmeciligi Ve Ticaret A.S**  
**Border Shipping Ltd**

Charterers  
**Norden A/S**

Deficiencies: Code - Category

**07126 - Oil accumulation in engine  
room**

Description

Means shall be provided to control leaks of flammable liquids. PSCO observed that #1 and #2 Generators were excessively leaking fuel at the pump and a significant amount of fuel collected between the cylinder heads. PSCO also observed fuel leaks at the fuel feeder pumps, the boiler burner fuel pump, and the MDO tank temperature sensor.

**07114 - Remote Means of control  
(opening,pumps,ventila**

Oil fuel pipes, which if damaged would allow oil to escape from a storage, settling or daily service tank, having a capacity of 500 and above shall be fitted with a cock or valve directly on this tank capable of being closed from a safe position outside the space. PSCO observed oil leaking from the #2 cylinder oil tank quick closing valve. The Chief Engineer was unable to demonstrate proper operation of the remote closing mechanism when asked.

**15109 - Maintenance of the ship and  
equipment**

The company should ensure that inspections are held at regular intervals, any non-conformity is reported, appropriate corrective action is taken and records are maintained. PSCO observed, for at least the previous five months, the engineering dept. has not been documenting known discrepancies in accordance with their SMS, including these previously identified discrepancies. Additionally, their pre-arrival check list states that cleaning of the main engine diesel generators, purifier area, pumps & filters are all "ok" despite the fact that the Chief Engineer has stated the conditions onboard have been in that condition since his arrival in March 2019.





Ship Name: **KOTA HARUM**

Ship Type: **Containership**

Flag: **Singapore**

IMO Number: **9238636**

Date of Action: **10/4/2019**

Action Taken: **Detention**

Port: **Apra, Guam**

Unit: **Sector Guam**

Recognized Org: **Nippon Kaiji Kyokai**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Not Class Related**

Relevant Certificates:

Organization Related  
to Detention:

Ship Management: Owners, Operators, or Managers  
**Pacific International Lines (Private) Limited**

Charterers  
**Mariana Express Lines Pte. Ltd.**

Deficiencies: Code - Category

**15101 - Safety and environment  
policy**

**15104 - Masters responsibility and  
authority**

**01315 - Oil record book**

**01315 - Oil record book**

Description

**The company and the ship shall comply with the requirements of the international safety management code. The company did not ensure that the policy is implemented and maintained at all levels of the organization in contradiction to ISM Code 2.2**

**The company and the ship shall comply with the requirements of the international safety management code. Vessel master did not motivate crew to observe company ISM plans and procedures in contradiction to ISM Code 5.1.2.**

**The oil record book (ORB) part I shall be completed on each occasion, whenever any of the following machinery space operations take place on the ship: discharge overboard or disposal of bilge water in machinery spaces. The vessel's ORB Part I is missing required entries for disposal of bilge water.**

**Each operation shall be fully recorded without delay in the Oil Record Book Part I. Entries required in ORB Part I were not logged as required without delay.**

**15102 - Company responsibility and authority**

Due to the multiple deficiencies of such serious nature found within key components of the vessel Safety Management System, the U.S. Coast Guard requires an external audit of the Safety Management System. The safety management objectives of the Company should, provide for safe practices in ship operation and a safe working environment; assess all identified risks to its ships, personnel and the environment and establish safeguards; and continually improve safety management skills of personnel ashore and aboard ships, including preparing for emergencies related both to safety and environmental protection. The external audit is required based on the following objective evidence found during expanded examination: The Port State Control Officers identified that the vessel's crew were not following the Safety Management System established by the Company, the Company was not providing adequate support in parts delivery and oversight, and the Master and Chief Engineer were unfamiliar with their responsibilities defined by the Company's Bilge Management Plan and Chapter 4, paragraph 4.2 in the Company's Environment Protection Program Manual and not following the procedures outlined therein.

Ship Name: **KRISTINA**  
Ship Type: **General Dry Cargo Ship**  
Flag: **Saint Vincent and the Grenadines**  
IMO Number: **7358705**  
Date of Action: **3/14/2019**  
Action Taken: **Detention**  
Port: **Miami, Florida**  
Unit: **Sector Miami**

Recognized Org: **Tsunami Marine Limited**  
Recognized Security Organization (RSO):  
Recognized Org (RO) Related: **Not Class Related**  
Relevant Certificates:  
Organization Related to Detention:  
Ship Management: Owners, Operators, or Managers  
**Grace Holding International S.A.**  
**Island Holding International**

Deficiencies: Code - Category  
**2515 - Company responsibility and authority**

Description  
**Objective evidence discovered during an expanded ISM Exam revealed the following on-conformities: the vessel failed to fully implement the requirements of the ISM code through their SMS procedures as evident by the following deficiencies indicating that the ship and/or company are not meeting the SMS requirements. Recommend an external audit. The company is responsible for ensuring that adequate resources and shore-based support are provided to enable persons to carry out their functions. During a conversation with the current Captain and previous Captain, it was determined the previous Captain of the vessel made mention to the company that the overall condition of the fire main had been in need of immediate repair for several months. The previous Captain additionally informed the PSCO that the DPA was verbally notified several times dating back to October 2018. The safety management system should include procedures ensuring that nonconformities and hazardous situations are reported to the company. Although the vessel Captain made verbal notification of the condition of the fire main they did not follow SMS procedures by properly filling out and filing the "Advice of Defect and Repair" form.**

**07113 - Fire pumps and its pipes**

**A cargo ship shall be provided with fire pumps, water service pipe, hydrant and hoses complying with Regulation 56: shall be sufficient for the effective distribution of the maximum required discharged. The ship's fire main piping on the weather deck was severely wasted showing signs of a large size holes. During the operational test of the system significant leaks were discovered which rendered the system unable to properly maintain water supply to the system in order to fight a fire. The water was leaking at approximately 100-150 gallon per minute.**

**07108 - Ready availability of fire fighting equipment**

**Fire extinguishing appliances shall be kept in good order and available for immediate use. The fire hydrant on the second deck (aft) had a barbecue grill tied off to fire hose connection blocking access, preventing immediate use.**



Ship Name: **LENA**

Ship Type: **Containership**

Flag: **Cyprus**

IMO Number: **9347750**

Date of Action: **3/12/2019**

Action Taken: **Detention**

Port: **St. Petersburg, Florida**

Unit: **Sector St Petersburg**

Recognized Org: **DNV GL MARITIME**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Not Class Related**

Relevant Certificates:

Organization Related  
to Detention:

Ship Management: Owners, Operators, or Managers

**Ragero Shipping Company Limited**

**Marlow Ship Management Deutschland  
GMBH & Co KG**

Charterers

**World Direct Shipping LLC**

Deficiencies: Code - Category

**15109 - Maintenance of the ship and  
equipment**

**15109 - Maintenance of the ship and  
equipment**

**11104 - Rescue boats**

Description

**Objective evidence discovered during an expanded ISM examination revealed the vessel failed to fully implement the requirement of the ISM Code through their safety Management System (SMS) as evident in the identified major non-conformities listed in the deficiencies. An external audit is recommended.**

**The company should establish procedures to ensure that the ship is maintained in conformity with the provisions of the relevant rules and regulations. In meeting these requirements, the company should ensure that; any non-conformity is reported; and appropriate corrective action is taken. The vessel's onboard safety management system states that a non-conformity should be report "If objective evidence indicates that a procedure was not followed". PSCO observed multiple situation where a non-conformity should have been reported to the company in accordance with the "nonconformities correction action" procedures (MSD-18-330) as evidenced by the following: Rescue boat not able to start due to dead battery, quick closing valves on diesel generator's fuel system modified to remain open, fuel oil and lube oil leaks through the engine room. A soft patch on emergency diesel generator fuel line. Inadequate firefighting equipment, and smoke detection on the boiler flat was intentionally blocked by a plastic cover. There were no nonconformities issued to the company for these conditions.**

**Rescue boat shall be stowed in a state of continuous readiness. PSCO observed rescue boat was unable to start due to battery not being charged.**

<b>07114 - Remote Means of control (opening,pumps,ventila</b>	<b>In multi-engine installations which are supplied from the same fuel source, means of isolating the fuel supply and spill piping to individual engines shall be provided. PSO observed the quick closing valves on the #1 and #2 ship service diesel generators tied with wire in the open position. PSCO asked the vessel's crew to test the offline #2 ship service diesel generator's quick closing valve an it failed to operate.</b>
<b>07126 - Oil accumulation in engine room</b>	<b>Means shall be provided to control the leaks of flammable liquids. PSCO observed lube oil pooled under and round both ship service diesel generator in excess of five gallons. Lube oi, fuel oil, and water was pooled and coated the engine room's bilge well and bilge wells walls. Additionally, lube and fuel oil was pooled under and around the oily water separator creating a fire hazard.</b>
<b>07110 - Fire fighting equipment and appliances</b>	<b>Two spare charges shall be provided for each required breathing apparatus. The vessel's fire plan requires four firefighting ensemble to include a self-contained breathing apparatus for each. Additionally, the vessel holds a dangerous good document of compliance requiring two additional self-contained breathing apparatuses. Therefore, the vessel is required 16 total self-contained breathing apparatus bottles on board. The vessel had nine total self-contained breathing apparatus bottles on board.</b>
<b>07123 - Operation of Fire protection systems</b>	<b>A fixed fire detection and fire alarm system shall be of an approved type and comply with the fire system safety coded. PSCO observed plastic covering the smoke detector in the engine room above the boiler's exhaust leak.</b>
<b>15101 - Safety and environment policy</b>	<b>Entry into an enclosed space should be planned out and the use of an entry permit system is recommended. An enclosed space entry permit should be issued by the master or a nominated responsible person and completed prior to entry into the space. The vessel' safety management system (MSD-51-360) states that the master shall ensure that for all entries into enclosed spaced, an enclosed space entry permit (MSD-51-360F) is completed and filed. PSCO identified that the electrician entered through a manhole to a forward bilge well piping trunk on 9MAR19 to conduct maintenance. An enclosed space entry permit (MSD-51-360F1) was not completed.</b>
<b>07126 - Oil accumulation in engine room</b>	<b>Means shall be provided to control the leaks of flammable liquids. PSCO observed crew fabricated catch pans filled with a lube oil/fuel oil mixture under each crank case exposing cover on the main engine holding up to one gallon.</b>

Ship Name: **LEO C**

Ship Type: **Containership**

Flag: **Liberia**

IMO Number: **9229312**

Date of Action: **12/12/2019**

Action Taken: **Detention**

Port: **Baltimore, Maryland**

Unit: **Sector Maryland-NCR**

Recognized Org: **Lloyd's Register**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Not Class Related**

Relevant Certificates:

Organization Related  
to Detention:

Ship Management: Owners, Operators, or Managers  
**Leo Shipping and Trading S.A.**  
**Danaos Shipping Co., Ltd**

Deficiencies: Code - Category

**07126 - Oil accumulation in engine  
room**

**07126 - Oil accumulation in engine  
room**

**15102 - Company responsibility and  
authority**

**04114 - Emergency source of power -  
Emergency generato**

Description

In a ship which oil fuel is used, the arrangements for the storage, distribution, and utilization of the oil fuel shall be such to ensure the safety of the ship and persons on-board. PSCO observed oil accumulated under the lube oil purifiers, to include a drip pan with oil in it. Fuel was surrounding all four auxiliary generators, on the main engine around and below all cylinders, including soaked fuel piping and double jacketed hoses. Oil was caked on the deck below all HFO purifiers and a bucket of fuel was hanging behind the NO. 2 HFO purifier pump.

The condition of the ship and its equipment shall be maintained to conform with the provisions of the present convention. PSCO observed oil soaked lagging throughout the engine room to include around all four generators, fuel pipes on the main engine, pipelines to multiple tanks and HFO purifier rooms.

The company should ensure inspections are held at regular intervals. PSCOs were provided with the monthly maintenance checklists for November 2019. The engine room portion of the checklist shows piping systems and steering gear were checked for leaks weekly in November 2019. The pipelines and lagging in the engine room led the PSCO to believe inspections are not being conducted in accordance with the maintenance plan.

Each emergency generating set arranged to be automatically started shall be equipped with starting devices approved by the administration with a second source of stored energy capable of at least 03 consecutive starts. PSCO observed hydraulic oil pooled on the deck of the emergency generator room resulting in the PSCO requesting the Chief Engineer to test the secondary means of start. The Chief Engineer was not able to start the emergency generator using the secondary starting device.



Ship Name: **MACONDO**

Ship Type: **Bulk Carrier**

Flag: **Panama**

IMO Number: **9299109**

Date of Action: **12/14/2019**

Action Taken: **Detention**

Port: **Charleston, South Carolina**

Unit: **Sector Charleston**

Recognized Org: **Bureau Veritas**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Not Class Related**

Relevant Certificates:

Organization Related  
to Detention:

Ship Management: Owners, Operators, or Managers  
**Navesco S.A.**

Charterers  
**Nucor Corporation**

Deficiencies: Code - Category  
**99101 - Other (Safety in general)**

Description  
**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 persons onboard. PSCO observed numerous and excessive fuel leaks from main engine constituting an ongoing, immediate, and extreme fire hazard.**

Ship Name: **MAERSK MEMPHIS**

Ship Type: **Containership**

Flag: **Singapore**

IMO Number: **9348651**

Date of Action: **2/20/2019**

Action Taken: **Detention**

Port: **Elizabeth, New Jersey**

Unit: **Sector New York**

Recognized Org: **Lloyd's Register**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Class Related**

Relevant Certificates: **Safety Construction**

**Safety Equipment**

Organization Related  
to Detention: **Lloyd's Register**

Ship Management: Owners, Operators, or Managers  
**A.P. Moller Singapore PTE LTD**  
**Maersk Line A/S**

Deficiencies: Code - Category

**07126 - Oil accumulation in engine  
room**

Description

**Provision shall be made to facilitate cleaning, inspection and maintenance of main propulsion and auxiliary machinery including boiler and pressure vessels. Excessive oil found in three separate buckets underneath the heavy fuel oil purifiers and pooled around the buckets. Several spots surrounding the heavy fuel oil purifiers found with soiled insulation. Excessive oil found pooled in spots on the main engine fuel pumps located on the second deck starboard side of the engine room. Excessive oil was also beneath generators number one and number three.**

**07110 - Fire fighting equipment and  
appliances**

**Fire fighting systems and appliances shall be kept in good working order and readily available for immediate use. Out of 10 high pressure CO2 bottles that were checked, 02 were found empty and 08 were found partially empty.**

**07110 - Fire fighting equipment and  
appliances**

**Fire protection systems and fire-fighting systems and appliances shall be properly tested and inspected. Vessel has 69 portable fire extinguishers on board that have not received their annual inspections. Order was made to replace all 69. however only 14 were replaced, 55 extinguishers remain outstanding for their annual inspections.**



Ship Name: **MAGESTIC**

Ship Type: **General Dry Cargo Ship**

Flag: **Saint Vincent and the Grenadines**

IMO Number: **8117421**

Date of Action: **3/1/2019**

Action Taken: **Detention**

Port: **Miami, Florida**

Unit: **Sector Miami**

Recognized Org: **Not Classed**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Not Class Related**

Relevant Certificates:

Organization Related  
to Detention:

Ship Management: Owners, Operators, or Managers  
**Magestic Holdings International S.A.**  
**Grace Holding International S.A.**

Deficiencies: Code - Category

**07121 - Crew alarm**

**04104 - Low level lighting in  
corridors**

**03106 - Windows, sidescuttles and  
deadlights**

Description

**All required fire detection systems shall be capable of automatically indicating the presence or indication of fire and also its location on the navigational bridge. The fire detection system required by the approved fire control plan does not have the means to indicate the location of a fire. The smoke detectors are independent, household type detectors, not tied into a ship-wide system, nor is there a fire alarm panel on the bridge or elsewhere.**

**In cargo ships of less than 5, 000 tons gross tonnage there shall be a self-contained emergency source of power capable of supplying the illumination to other services as the Administration may require. Emergency lighting was extinguished and did not sufficiently illuminate escape routes form steering gear room, purifier room, and emergency exit ladder in the forward part of the upper engine room upon testing by PSCO.**

**Sidescuttles and window, together with their glasses, shall be of an approved design and substantial construction. Window frame on aft superstructure adjacent to the officer's mess is warped and compromise the strength and weathertight integrity of the window. The window frame does not support the glass and the window pane is only held in by paint and caulking.**

**02110 - Beams, frames, floors-  
op.damage**

After any survey of the ship under Regulation 7, 8, 9 or 10 of this Chapter has been completed, no change shall be made in the structural arrangements, machinery, equipment, etc. Covered by the survey, without the sanction of the Administration. PSCOs identified deck plating and structural frame work surrounding access opening leading to lower engine room with evidence that it had been cut out. The size of the removed area was approximately five good wide by seven foot long and had three severed frames in five different locations. Cut deck plating was reinstalled and welded on the topside only. Evidence of incomplete welding on the deck plate underside utilized sporadic tack welds and no welding to support the severed frames. Additionally, overhead frames 34 and 29 of upper engine room had circular cutouts approximately 1/4 the width of the frame removed from them to be used for lifting points. Chief Engineer state the deck plating was removed and the holes cut into overhead frames to facilitate the change out of an auxiliary engine. Vessel could not provide documentation to verify flag approval for these modifications.



Ship Name: **MAPLE PIONEER**

Ship Type: **Bulk Carrier**

Flag: **Hong Kong**

IMO Number: **9493494**

Date of Action: **11/8/2019**

Action Taken: **Detention**

Port: **Philadelphia, Pennsylvania**

Unit: **Sector Delaware Bay**

Recognized Org: **China Classification Society**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Not Class Related**

Relevant Certificates:

Organization Related  
to Detention:

Ship Management: Owners, Operators, or Managers  
**Maple Leaf Shipping Co Ltd**  
**United Fame Shipping Limited**  
Charterers  
**Lauritzen Bulkers**

Deficiencies: Code - Category

**11119 - Immersion suits**

**07109 - Fixed fire extinguishing  
installation**

**14105 - Pumping, piping and  
discharge arrangements**

Description

**Before the ship leaves port and at all times during the voyage, all lifesaving appliances shall be in working order and ready for immediate use. 34 immersion suit zippers are not in working order or the seams are severely deteriorated, rendering them inoperable.**

**Machinery spaces of category A above 500 m3 in volume shall be protected by an approved type of fixed water based or equivalent local application fire-extinguishing system. The system should be available for immediate use and capable of continuously supplying water based medium for at least 20 min. During test of fuel oil purifier local water fire-extinguishing system (hypermist), nozzle discharge pressure and volume inadequate to extinguish fire. During test of generator #1 local water fire-extinguishing system, smoke detector did not activate, preventing the system from automatically operating to extinguish a fire.**

**The arrangement on board ship for the extraction of samples from the 15ppm bilge separator discharge line to the 15ppm bilge alarm should give a truly representative sample of the effluent with an adequate pressure and flow. PSCO conducted test of oil content meter while the oily water separator was operating in recirculation mode and discovered that the system would still simulate an overboard discharge when oil content meter was presented with a fresh water sample. Additionally, the oil content meter's sample valve was labeled incorrectly, and crew has been operating system in fresh water sample mode when thought to be in bilge water or discharge sample mode.**

The company should establish procedures to ensure that the ship is maintained in accordance with the provisions of the relevant rules and regulations and with any additional requirements which may be established by the company. (1) 34 immersion suits found in unsatisfactory condition. Vessel's SMS ( Doc#SMO-412, 6.8.4) requires monthly checks and once in three months donning of suit. Three months (August, September, October 2019) of monthly maintenance and inspection checklists (form 07) signed by 3/0 and Master indicate satisfactory condition of immersion suits.

(2) Fuel oil purifying unit local water fire-extinguishing system nozzle discharge unsatisfactory. Generator #1 local water fire-extinguishing system smoke alarm inoperable. Vessel conducts monthly and annual checks of water mist system per Monthly Maintenance and Inspection checklist-FFA form 08 and form 12 (Annual). Three months ( August, September and October) and 2018 Checklist records indicate satisfactory condition of all equipment. During test of smoke detector, crew attempted to use a heat gun to test. Crew was unable to reset water mist system for 30+ minutes following activation, incorrectly believing that the bridge panel must reset the system.

(3) Improper operation of OWS permits oily waste to be discharged overboard. Crew is unfamiliar with operation of OWS and OCM. No procedures available for testing of OCM alarms . Improper labeling of valve.

Due to the objective evidence in the above deficiencies that the vessel is not in substantial compliance with relevant conventions, the Captain of the Port questions the adequacy and/or implementation of the vessel's SMS under the ISM code. An audit is recommended to be conducted within 30 days by the flag state or RO to determine whether the ship is operating in accordance with the ISM code. Provide decision to the U.S. Coast Guard.



Ship Name: **MELINDA**

Ship Type: **Bulk Carrier**

Flag: **Marshall Islands**

IMO Number: **9623881**

Date of Action: **12/21/2019**

Action Taken: **Detention**

Port: **New Orleans, Louisiana**

Unit: **Sector New Orleans**

Recognized Org: **Bureau Veritas**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Not Class Related**

Relevant Certificates:

Organization Related  
to Detention:

Ship Management: Owners, Operators, or Managers

**SPV 4 LLC**

**Technomar Shipping Inc**

Charterers

**Pacnav De Mexico**

Deficiencies: Code - Category

**01315 - Oil record book**

Description

**The Oil Record Book Part I shall be completed on each occasion on a tank-to-tank basis if appropriate, whenever any of the following machinery space operations take place in the ship: discharge overboard or disposal otherwise of bilge water which has accumulated in machinery spaces. PSCO observed that Oil Record Book entries did not accurately reflect the overboard discharge operation conducted on 2 September 2019 or the overboard discharge operation conducted on 07 October 2019.**



Ship Name: **MIDNIGHT CHIEF**

Ship Type: **Ro-Ro-Cargo Ship**

Flag: **Vanuatu**

IMO Number: **8115722**

Date of Action: **2/8/2019**

Action Taken: **Detention**

Port: **San Juan, Puerto Rico**

Unit: **Sector San Juan**

Recognized Org: **Bulgarian Register of Shipping**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Not Class Related**

Relevant Certificates:

Organization Related  
to Detention:

Ship Management: Owners, Operators, or Managers  
**Midnight Marine Holdings Ltd**

Deficiencies: Code - Category

**15108 - Reports of non-conf.,  
accidents & hazardous occur.**

Description

Objective evidence discovered during an expanded ISM exam revealed the following non-conformities: The vessel failed to fully implement the requirements of the ISM Code through their SMS procedures. These identified deficiencies are evidence that the ship and/or company are not meeting the SMS requirements. Recommend and external audit.

The company should ensure that the policy is implemented and maintained at all levels of the organizations, both ship-based and shore-based. The SMS has not been adequately implemented and maintained ashore or onboard as evidence by non-conformities being reported but no action was taken by the company. On 12Jan2019, vessel reported the following 04 non-conformities to the company and have not yet been resolved: broke beams on ramp need welding, bridge water tight door not closing properly, port anchor needs to be welded to adjust crossbar, and ballast water pipe broken in engine room. Since reporting the non-conformities, the vessel has entered a U.S. port 20 times, its home port more than 10, and could have received the service/parts needed to correct the reported non-conformities; however, the company has not taken corrective action. In addition, multiple non-conformities were known to the crew but went unreported. Crew members were aware of Coast Guard issued deficiencies #5, 8, 9, and 10 prior to the Port State Control boarding and did not fill out a non-conformity report in accordance with the SMS requirements. 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. The identified material deficiencies 2, 3, 4, 5, 7 and 11 were unknown to the vessel's crewmembers, and no non-conformity reports were made.

The company should establish procedures, plans, and instructions, including checklists as appropriate, for key shipboard operations concerning the safety of the personnel, ship, and protection of the environment. No checklist is provided by the company instructions how often, procedures, or list of items to check regarding the ship's first aid kits. Both first aid kits carried onboard the vessel contained in excess of 75% expired and damaged items. In addition, the crew has multiple checklist for engineering and check department rounds, maintenance, and regular task that are not listed in the

vessel's SMS. In addition, the vessel's deck department found a wasted fire hydrant pipe that was verbally reported to the DPS; however, the engineering department was not aware and did not track the required corrective actions.

#### **10111 - Charts**

All ships, irrespective of size, shall have: nautical charts to plan and display the ship's route for the intended voyage and to plot and monitor positions throughout the voyage. An Electronic Chart Display and Information System (ECDIS) is also accepted as meeting the chart carriage requirements. The ship's electronic chart display does not meet the ECDIS performance requirements as stated in resolution A.817(19). The vessel used paper chart 25640 with scale 1:326,856 which does not display detailed navigational characteristics attributing to safe and efficient course plotting into Guayanilla Harbor. The appropriate chart for Guayanilla Harbor is chart 25681 with scale 1:10,000.

Ship Name: **MILTIADES II**

Ship Type: **General Dry Cargo Ship**

Flag: **Liberia**

IMO Number: **9300831**

Date of Action: **7/2/2019**

Action Taken: **Detention**

Port: **Houston, Texas**

Unit: **Sector Houston-Galveston**

Recognized Org: **American Bureau of Shipping**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Not Class Related**

Relevant Certificates:

Organization Related  
to Detention:

Ship Management: Owners, Operators, or Managers

**PL Shipping Co**

**Milton Shipping Ltd**

Charterers

**Suisse-Atlantique**

Deficiencies: Code - Category

**11104 - Rescue boats**

Description

Before the ship leaves port and at all times during the voyage, all life-saving appliances shall be in working order and ready for immediate use (20.2). Rescue boat should be stowed in a continuous state of readiness for launching in not more than five minutes (14.1). At approximately 1145 local time, PSCO asked to witness operational test of rescue boat engine. Crew could only start rescue boat using ether and rescue boat engine would not run for more than 5 seconds after start. At 1430 local time, rescue boat engine remained inoperable. PSCO observed crew rebuilding the carburetor and replacing the spark plugs in an attempt to bring engine to operational status.

**15109 - Maintenance of the ship and equipment**

The company should ensure that inspections are held at appropriate intervals, any non-conformity is reported, and appropriate corrective action is taken.

Company SMS manual, Chapter 9.4 requires "all employees and everyone involved in Company's activities should report any deficiency or hazard. The report may be verbal or in writing, in which case the form NCR 001... may be used." There is no objective evidence of non-conformities reported via form NCR 001, nor any other objective evidence of appropriate corrective action taken, for the operational/technical deficiencies #1 and #3 - #7.

Company SMS requires Form M-028b, "Planned Maintenance Program for Bridge Equipment, Life Saving Appliances and Firefighting Equipment", to be completed each month, and to "tick with the appropriate marks for each box next to the maintenance routines". Three different marks are provided for OK (check mark), NOT APPLICABLE (N/A), and NOT OK (NOT OKAY). The May and June forms have "X" marks only and has zero items marked as "not ok", even though there are multiple items listed (ex: low pressure CO2, fixed dry powder) with which the vessel is not equipped. \*\* An additional external verification of the ISM-SMC by the RO is required.

Ship Name: **MISS LILIE I**

Ship Type: **General Dry Cargo Ship**

Flag: **PALAU**

IMO Number: **5298963**

Date of Action: **3/7/2019**

Action Taken: **Detention**

Port: **Miami, Florida**

Unit: **Sector Miami**

Recognized Org: **International Register of Shipping**

Recognized Security  
Organization (RSO): **International Register of Shipping**

Recognized Org  
(RO) Related: **Not Class Related**

Relevant Certificates:

Organization Related  
to Detention:

Ship Management: Owners, Operators, or Managers

**Caribbean Ship Services**

**JJ Cargo Shipping Lines**

Deficiencies: Code - Category

**01113 - Minimum Safe Manning  
Document**

**10111 - Charts**

Description

**For every ship, the Administration shall establish appropriate minimum safe manning. Every officer in charge of an engineering watch in manned engine-room, shall hold a certificate of competency. Vessel does not have Officer in charge of an Engineering Watch as required by the Minimum Safe Manning document. Oiler is currently serving in that role without proper training or certification IAW manning document.**

**Nautical charts and publications shall be adequate and up to date. Charts on board, including charts along the vessel's route, Miami to Haiti, have been update to reflect changes since original drawing in 2017.**



Ship Name: **MOMI ARROW**

Ship Type: **Bulk Carrier**

Flag: **Panama**

IMO Number: **9385506**

Date of Action: **9/12/2019**

Action Taken: **Detention**

Port: **St. Petersburg, Florida**

Unit: **Sector St Petersburg**

Recognized Org: **Nippon Kaiji Kyokai**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Class Related**

Relevant Certificates: **Safety Equipment**

Organization Related  
to Detention: **Nippon Kaiji Kyokai**

Ship Management: Owners, Operators, or Managers  
**Santoku Senpaku Co., Ltd.**  
**San Carlos Navieros Panama SA**  
Charterers  
**G2 Ocean AS**

Deficiencies: Code - Category

**15109 - Maintenance of the ship and  
equipment**

**15109 - Maintenance of the ship and  
equipment**

**15112 - Certification, verification  
and control**

Description

The company should establish procedures, plans and instructions, including checklists as appropriate for key shipboard operations. The vessel's SMS for the checking of portable fire extinguishers requires the extinguishers to be checked in accordance with the maker's instructions. A maintenance log for firefighting appliances is being utilized to conduct monthly checks. The checklist requires the crew member to ensure the extinguisher is in its appropriate location as per the fire plan and in good condition. The maker's instructions include more items to be checked monthly; due to the limited checklist that the vessel is using, the extinguishers are not being fully inspected as per the maker's instructions. This led to the identification of 11 out of 31 for extinguishers not ready for immediate use.

Every company should develop, implement and maintain a safety management system which includes instructions and procedures to ensure safe operations of ships. The vessel's SMS section S-09.10.01-2.2 states that maintenance shall be carried out in accordance with maker's instructions. The maker's instructions were not provided to the vessel for the heat detectors installed on the vessel.

The annual survey shall include a general inspection of the structure, machinery and equipment referred to in paragraph (B)(I), to ensure that they have been maintained in accordance with regulation 11(A) and that they remain satisfactory for the service for which the ship is intended. A classification society survey was conducted on 02NOV2018 with no mention of expired and inadequate spare charges for fire extinguishers. Yamato fire extinguisher spare chargers were found to be expired after August 2014.



**07108 - Ready availability of fire fighting equipment**

Fire extinguishers shall be situated ready for use. PSCO observed a fire extinguisher next to the oil water separator whose pointer on pressure indicator was on white, indicating no pressure. As per Kidde maker's instructions, an extinguisher with a pointer not on green pressure indicator is not ready for use. PSCO observed 8 Kidde fire extinguishers in the engine room, 1 Kidde fire extinguisher on the bridge, 1 Kidde fire extinguisher in the A-Deck passage way near the galley, and 1 Kidde fire extinguisher in the starboard lifeboat whose pressure indicators were on red.

**07110 - Fire fighting equipment and appliances**

Spare charges shall be provided for 100% of the first 10 extinguishers and 50% of the remaining fire extinguishers. The vessel is required to have 31 5 kilogram fire extinguishers on board the vessel as noted on Fire Control Plan. In addition, the vessel is required to carry 21 spare 5 kilogram fire extinguishers or charges. 8 of the required extinguishers onboard were Yamato brand and 23 of the required extinguishers were Kidde. The spare charges on board are only for Yamato fire extinguisher model SA-17NR and were manufactured in August 2009. The validity of the Yamato spare charge is five years per maker's instructions. The vessel had zero spare extinguishers or charges for the Kidde brand fire extinguishers on board. All spare charges are expired, thus the vessel has zero spare charges or spare extinguishers on board.

**07106 - Fire detection and alarm system**

The function of fixed fire detection systems shall be periodically tested by means of equipment producing hot air at the appropriate temperature. During the exam, PSCO observed crew was testing heat detector with a lighter, in which crew could not prove was the appropriate temperature for heat detectors installed on vessel.

**14119 - Oil and oily mixtures from machinery spaces**

Means shall be provided to control leaks of flammable liquids. PSCO observed main engine cylinders 1, 2, 3, and 6 were leaking fuel oil from the high-pressure fuel pumps. Evidence of excessive leaking was found in the engine room. Diesel-soaked rags were found around the cylinders, unapproved plastic collection pans were installed for excessive diesel oil leaks creating a fire hazard, and the decking in the engine room near diesel leaks was slippery from the fuel.



Ship Name: **MONARCH QUEEN**

Ship Type: **Ro-Ro-Cargo Ship**

Flag: **Tanzania**

IMO Number: **7113894**

Date of Action: **1/10/2019**

Action Taken: **Detention**

Port: **West Palm Beach, Florida**

Unit: **MSD LAKE WORTH (AKA. WEST**

Recognized Org: **CONARINA**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Not Class Related**

Relevant Certificates:

Organization Related  
to Detention:

Ship Management: Owners, Operators, or Managers  
**Monarch Shipping Co., Ltd.**

Deficiencies: Code - Category

**15102 - Company responsibility and  
authority**

Description

**Objective evidence discovered during an expanded ISM exam revealed the following nonconformities: The vessel failed to fully implement the requirements of the ISM Code through their SMS procedures as evident by the following deficiencies indicating that the ship and/or company are not meeting the SMS requirements. Recommend an external audit.**

**No 1 - The company should ensure that each ship is manned with qualified, certificated, and medically-fit seafarers in accordance with national and international requirements. The Chief Engineer has been onboard since June of 2018 without a flag endorsement. The 2nd Engineer boarded the vessel on December 12, 2018, and does not have a flag endorsement. Evidence onboard demonstrated that a request was made by the Master to the DPA via electronic correspondence on May 3, 2018, requesting the submittal of the application for endorsement for the Chief Engineer. No action was take on the endorsement request by the company.**

**No 2 - The company should establish procedures to ensure that the ship is maintained in conformity with the provision so the relevant rules and regulations and with any additional requirements which may be established by the company.**

**In meeting these requirements, the company should ensure that appropriate corrective action is taken. On April 19, 2018, the Chief Officer submitted a non-conformance /corrective action report to the DPA reporting the failure of the HF/SSB DSC, and on June 22, 2018, the master submitted another report for the failure of one handheld VHF radio. On October 15, 2018 the Master submitted a purchase request to the DPA to attain update nautical publications to include the U.S. Coast Plot, Light List, and Sailing Directions. Although no non-conformance/corrective action report was files, it was identified that the ships[s crew notified the DPA of damage and wastage in the port anchor winch drive gear, rendering the anchor unsafe to use. Up to date, none of the identified issues have been corrected by the company.**

**No 3 - Every company should develop. Implement and maintain a safety management system which includes the following functional requirements: instructions and procedures to ensure safe operation of ships and**

protection of the environment in compliance with relevant international and flag state legislation. The vessel cargo loading procedures are not in compliance with international regulations for the loading of vehicles. Several vehicles were loaded in such a way as to prevent immediate access to fire-fighting equipment, rendering unavailable for immediate use.

**01214 - Endorsement by flagstate**

All seafarers serving on board who are required to be certificated in accordance with the Convention hold an appropriate certificated or a valid dispensations, or provide documentary proof that an application for an endorsement has been submitted to the Administration in accordance with regulation I/10, paragraph 5. The Chief Engineer's Tanzanian endorsement became invalid on June 7, 2018, and sailed for a period of approximately six months without readily available documentary proof that an application for an endorsement had been submitted to the administration. A copy of electronic correspondence with an enclosed application was sent from the master of the vessel to the company's DPA dated May 3, 2018, but no action was taken. Additionally, the 2nd Engineer boarded the vessel on December 12, 2018, without a flag endorsement. No physical or electronic evidence was in the process of reviewing the application. The lack of flag state endorsement or readily available documentary proof that an application for an endorsement has been submitted voids compliance with meeting the minimum safe manning requirement of the administration.

**07108 - Ready availability of fire fighting equipment**

Fire extinguishing appliances in new and existing passenger ships and cargo ships shall be kept in good order and available for immediate use at all times during the voyage. Access to the fire hydrant stations were obstructed and inaccessible by loaded vehicles, rendering the equipment not available for immediate use.

**05105 - MF/HF Radio installation**

Every ship, while at sea, shall be capable of transmitting ship-to-shore, shore-to-ship, and ship-to-ship distress alerts by at least two separate and independent means, each using different radio communications service. It was discovered by PSC Officers that the VHF radio installation is not functioning and the MF/HF SSB/DSC has a malfunction, causing the installation to power cycle when attempting to transmit, thereby rendering the equipment inoperable.

Ship Name: **MOONLIGHT SERENADE**

Ship Type: **Bulk Carrier**

Flag: **Liberia**

IMO Number: **9392810**

Date of Action: **11/26/2019**

Action Taken: **Detention**

Port: **Los Angeles, California**

Unit: **Sector Los Angeles-Long Beach**

Recognized Org: **Nippon Kaiji Kyokai**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Class Related**

Relevant Certificates: **IOPP**

Organization Related  
to Detention: **Nippon Kaiji Kyokai**

Ship Management: Owners, Operators, or Managers  
**Marine Ace Co., Ltd.**  
**Hawk Marine Corporation S.A.**

Charterers  
**Daiichi Chuo Kisen Kaisha**

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

Description  
**Oil filtering equipment shall be of a design approved by the Administration and shall be such as will ensure that any oily mixture discharged into sea after passing through the system has an oil content not exceeding 15ppm. During the operational test of the OWS, fresh water was being supplied to the sample line prior to entering the OCM via additional lines not in approved vessel drawings. Fresh water was directed into OCM providing an inaccurate and diluted sample. There are no procedures or drawings identifying the existence of the fresh water supply line directly connected to the sample line nor do any records exist on the installation or approval of the fresh water supply. While demonstrating operation of the OWS crew operated OWS with fresh water valve open.**

Ship Name: **MORNING CARA**

Ship Type: **Ro-Ro-Cargo Ship**

Flag: **Panama**

IMO Number: **9574092**

Date of Action: **3/11/2019**

Action Taken: **Detention**

Port: **San Juan, Puerto Rico**

Unit: **Sector San Juan**

Recognized Org: **Nippon Kaiji Kyokai**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Not Class Related**

Relevant Certificates:

Organization Related  
to Detention:

Ship Management: Owners, Operators, or Managers

**World Marine Co. Ltd**

**Ultima Shipholding SA**

Deficiencies: Code - Category

**11112 - Launching arrangements  
for survival craft**

Description

**Before the ship leaves port and at all times during the voyage, all life saving appliances shall be in working order and ready for immediate use. During lifeboat lowering test, the davit arms lowered at a different rates, causing the lifeboat to be at an uneven trim at the embarkation level. At this time it was observed by the PSCO, that the aft wire rope was warped and beginning to become unbraided.**

Ship Name: **MSC ESTHI**

Ship Type: **Containership**

Flag: **Panama**

IMO Number: **9304411**

Date of Action: **4/17/2019**

Action Taken: **Detention**

Port: **Newark, New Jersey**

Unit: **Sector New York**

Recognized Org: **DNV GL MARITIME**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Not Class Related**

Relevant Certificates:

Organization Related  
to Detention:

Ship Management: Owners, Operators, or Managers

**Mediterranean Shipping Co. S.R.L.**

**Rapnael Shipping Company Limited**

Charterers

**MSC Mediterranean Shipping Company  
S.A.**

Deficiencies: Code - Category

**15107 - Emergency preparedness**

Description

The company and the ship shall comply with the requirements of the ISM Code. The crew identified the fire main was leaking on deck, yet they failed to report their finding to the company through their electronic maintenance system. Additionally, their SMS identifies that the fixed high pressure CO2 system shall be checked monthly, verifying all releasing controls are in the proper position and readily accessible for immediate use. While conducting a deck walk, the PSCE Identified a weather tight box containing the CO2 release controls and fire dampener to the emergency generator space was wasted. Upon further investigation the box was extremely difficult to open and the responsible crewmember admitted he bypasses inspecting the equipment as required by the SMS. Additionally, the SMS identifies verifying all discharge piping and pneumatic tubing is intact and has not been damaged on the fixed CO2 system. A natural vent in the CO2 room is causing wastage on the system which has not been identified by the crew during their monthly maintenance. They report the system is in good order. Finally, crewmembers are to conduct joint inspections when being relieved and record the changeover on the "Handing over form. These forms reflect crewmembers are copying previous entries only making minor modifications such as changing the date. The SMS, nor the electronic maintenance system, does not identify the fire main as a critical system or required maintenance on the system. A full audit of the SMS recommended.

Ship Name: **NEDERLAND REEFER**

Ship Type: **Refrigerated Cargo Carrier**

Flag: **Bahamas**

IMO Number: **9015199**

Date of Action: **2/21/2019**

Action Taken: **Detention**

Port: **Philadelphia, Pennsylvania**

Unit: **Marine Safety Detachment Lewes**

Recognized Org: **Bureau Veritas**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Not Class Related**

Relevant Certificates:

Organization Related  
to Detention:

Ship Management: Owners, Operators, or Managers

**Chartworld Shipping Corp**

**Nederland Shipping Corporation**

Charterers

**Seatrade Reefer Chartering NV**

Deficiencies: Code - Category

**14104 - Oil filtering equipment**

Description

**Oil filtering equipment shall be of design approved by the administration and shall be such as will ensure that any oily mixture discharge into the sea after passing through the system has oil content not exceeding 15PPM. Upon conducting an operational test of the oily water separator (OWS) in accordance with procedures outlined in USCG Marine Safety Manual (MSM) Volume II, the effluent being processed registered out of range (EE/Oil content too high) on the oil content meter. The system was ran by the crew intermittently for over an hour, and at no time could the system produce an effluent below 15ppm.**





Ship Name: **NEPTUNE**

Ship Type: **Research Ship**

Flag: **Marshall Islands**

IMO Number: **7504237**

Date of Action: **3/15/2019**

Action Taken: **Detention**

Port: **East Providence, Rhode Island**

Unit: **Sector Southeastern New England**

Recognized Org: **Not Classified**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Not Class Related**

Relevant Certificates:

Organization Related  
to Detention:

Ship Management: Owners, Operators, or Managers  
**Neptune EHF**

Deficiencies: Code - Category

**01199 - Other (certificates)**

Description

**The certificate is invalid and considered revoked without prior notice when the certificate fails to maintain acceptable financial responsibility. Vessel's current company is bankrupt; therefore, their COFR and financial responsibility is invalid. Does not reflect current operator.**

**0899 - Other (accid. prevent.)**

**Non tank vessel subject to this subpart may not continue to operate on the navigable waters of the U.S. if the period of the VRP authorization has expired. The NT VRP is considered invalid because the company has gone bankrupt. Does not reflect current operator.**

**0100 - Ship's certificates and documents**

**A cargo ship safety construction certificate, cargo ship safety equipment certificate, and cargo ship safety radio certificate shall be issued for a period specified by the administration, which shall not exceed five years. All SOLAS documents are expired from the date of 11 MAR 19.**

**0150 - Oil pollution prevention (IOPP)**

**An international oil pollution preventing certificate shall be issued for a period specified by the administration , which shall no exceed five years. The IOPP expired on 11MAR19.**

**0160 - IAPP Certificate**

**An international air pollution preventing certificate shall be issued for a period specified by the administration , which shall not exceed five years. The IAPP expired on 11MAR19.**

**0100 - Ship's certificates and documents**

**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. Due to the vessel company's bankruptcy. The ISM document of compliance and the ISM-safety management certificate are considered to be invalid because they do not reflect the current operator.**

**0120 - Load lines**

**An international load line certificate shall be issued to every ship which has been surveyed and marked in accordance with the present convention. The international load line certificate expired on 11MAR19.**

**1400 - Propulsion & aux. machinery**

After any survey of the ship under regulations 7,8,9 or 10 has been completed, no change shall be made in the structural arrangements, machinery, equipment and other items covered by the survey, without the sanction of the administration. Vessel had a temporary service generator on deck that was connected to the shore based connection with the capability of connecting to the vessel's main switchboard installation. This configuration was not approved by administration.

**2500 - ISM related deficiencies**

Every company should develop ,implement and maintain a safety management system which includes the following compliance with relevant international and flag state legislation defined line of communication between shore and shipboard personnel and procedures for reporting non-conformities. The vessel's SOLAS and Load Line certificates and regulatory required vessel response plan and COFR expired or otherwise became invalid in US waters. The vessel remained at sea for four days continuing of operations, and then arrived in port in non-compliance with international and flag , state legislation. The master failed to report a non-conformities to the company. The company failed to communicate to the vessel it was in non-compliance with international and flag state legislation.



Ship Name: **NIKOS P**

Ship Type: **Containership**

Flag: **Marshall Islands**

IMO Number: **9329629**

Date of Action: **5/22/2019**

Action Taken: **Detention**

Port: **Los Angeles, California**

Unit: **Sector Los Angeles-Long Beach**

Recognized Org: **DNV GL MARITIME**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Not Class Related**

Relevant Certificates:

Organization Related  
to Detention:

Ship Management: Owners, Operators, or Managers  
**Technomar Shipping Inc**  
**Newco3 Maritime Corporation**

Charterers  
**CMA CGM**

Deficiencies: Code - Category  
**15101 - Safety and environment  
policy**

Description  
**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-based 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 identified deficiencies are evidence that the ship and/or company are not meeting the SMS requirements. Recommend external audit.**  
**PSCO identified that weekly checks as required by Technomar Management System Procedure QP13 were not carried out properly. The check sheets filled out by the crew state that the following systems were "OK" without any amplifying remarks: the fire alarm and fire detection system, condition of fire-fighting outfits, stowage of flammable liquids in engine room, and condition of securing devices for watertight doors and hatches. PSCO identified deficiencies on all these systems and found objective evidence that crewmembers were aware of the tear in fire-fighting outfit and excessive fuel oil in the machinery space but had not reported them to the appropriate officers and master. The crew failed to implement their SMS procedures as per the ISM code.**

**15108 - Reports of non-conf.,  
accidents & hazardous occur.**

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. PSCO identified substantial sea water ingress into the engine room. Upon further questioning of the crew, the 2/E stated he had identified the leak two weeks ago, installed a soft patch, and notified the Chief Engineer. The Master had no knowledge of the ingress of water.

**13199 - Other (machinery)**

The condition of the ship and its equipment shall be maintained to conform with the provisions of the present regulations to ensure that the ship in all respects will remain fit to proceed to sea without danger to the ship or persons on board. The machinery, boilers and other pressure vessels, associated piping systems and fittings shall be of a design and construction adequate for the service for which they are intended and shall be so installed and protected as to reduce to a minimum any danger to persons on board, due regard being paid to moving parts, hot surfaces and other hazards. PSCO witnessed substantial sea water ingress of approximately one gallon per minute emanating from the main raw water riser to the marine sanitation device. Sea water was draining into bilge pockets via a crew-constructed catchment basin. Additionally, crew had installed a soft patch to limit the ingress. Statements from the crew indicate the condition had been allowed to exist for at least two weeks.

**07118 - International shore-  
connection**

Fire-fighting systems and appliances shall be kept in good working order and readily available for immediate use. At approximately 1015 local time, PSCO discovered that the international shore connections were not in the location as designated per local signage and Fire Control Plan. The crew did not know where the international shore connection was located. It took the crew approximately 04 hours to locate the international shore connections and place them in the location designated by the Fire Control Plan.



Ship Name: **ORANGE WAVE**  
Ship Type: **Refrigerated Cargo Carrier**  
Flag: **Liberia**  
IMO Number: **9507123**  
Date of Action: **9/11/2019**  
Action Taken: **Detention**  
Port: **St. Petersburg, Florida**  
Unit: **Sector St Petersburg**

Recognized Org: **Lloyd's Register**  
Recognized Security Organization (RSO):  
Recognized Org (RO) Related: **Class Related**  
Relevant Certificates: **Safety Equipment**  
Organization Related to Detention: **Lloyd's Register**  
Ship Management: Owners, Operators, or Managers  
**International Bulk Reefers**  
**Atlanship S.A.**  
Charterers  
**Citrus Products Inc**

Deficiencies: Code - Category

**15109 - Maintenance of the ship and equipment**

Description

Every company should develop, implement and maintain a safety management system which includes instructions and procedures to ensure safe operations of ships. The vessel's SMS section 1.17.2 requires the Chief Engineer to ensure all smoke/heat detectors to be tested in accordance with the maker's instructions. The maker's instructions were not provided to the vessel for the installed heat detectors.

**15112 - Certification, verification and control**

The annual survey shall include a general inspection of the structure, machinery and equipment referred to in paragraph (B) (I), to ensure that they have been maintain in accordance with regulation 11 (A) and that they remain satisfactory for the service for which the ship in intended. Fire detection system was recently surveyed 02AUG2019 with no mention of malfunction. The new detector had been onboard and uninstalled since 2018.

**07106 - Fire detection and alarm system**

A fixed fire detection and fire alarm system of an approved type in accordance with the relevant provisions of regulation 13 shall be installed in periodically unattended machinery spaces. PSCO observed eight of nine heat detectors the engine room were unable to be tested in accordance with the maker's temperature limits. Multiple heat detectors were meted and no longer operating as originally installed and do not meet the requirements for the reduction in crew authorized on the minimum safe manning document for an unattended machinery space.



**07106 - Fire detection and alarm system**

Fire detection and fire alarm systems shall be kept in good order so as to ensure their required performance if a fire occurs. PSCO observed eight of nine heat detectors in the engine room were inoperable and heat detector above the deep fat fryer in galley was inoperable. New heat detectors and proper testing equipment were delivered to the vessel in 2018, but the new heat detectors were never installed.

**07106 - Fire detection and alarm system**

The function of the detection system shall be periodically tested by means of equipment producing hot air at the appropriate temperature. PDCO observed multiple heat detectors in engine room and galley were melted. During the exam, PSCO witnessed crew testing heat detectors with a heat gun, in which crew could not prove was the appropriate temperature for heat detectors installed on vessel.

**07124 - Maintenance of Fire protection systems**

Suitable instructions and component spares for testing and maintenance shall be provided. PSCO observed that the vessel does not have maker's instructions on board that explain maintenance and testing procedures for heat detectors installed on vessel.



Ship Name: **PAC ANTARES**  
Ship Type: **General Dry Cargo Ship**  
Flag: **Singapore**  
IMO Number: **9262962**  
Date of Action: **10/1/2019**  
Action Taken: **Detention**  
Port: **Fort Macon**  
Unit: **Sector North Carolina**

Recognized Org: **American Bureau of Shipping**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Not Class Related**

Relevant Certificates:

Organization Related  
to Detention:

Ship Management: Owners, Operators, or Managers  
**PACC Ship Managers PTE Ltd**  
**Antares Maritime PTE LTD**  
Charterers  
**PACC Line**

Deficiencies: Code - Category

**14199 - Other (MARPOL Annex I)**

**15109 - Maintenance of the ship and equipment**

**14121 - Suspected of discharge violation**

Description

A ship when in the port of another party is subject to inspection by officers duly authorized by such party concerning requirements under Annex I, when there are clear grounds for believing that the master or crew are not familiar with essential shipboard procedures relating to the prevention of pollution by oil. PSCO identified an unrelated water mixed oil residue in the engine room, pipe duct tunnel. PSCO believes the installed service pump was used to bypass the installed OWS filtering equipment.

The company should establish procedures to ensure that the ship is maintained in accordance with the provisions of the relevant rules and regulations established by the company. Due to the objective evidence in the above deficiencies, the vessel is not in substantial compliance with relevant conventions. The COTP questions the adequacy and or implementation of the vessels SMS under the ISM Code. An external audit is recommended to be conducted within 30 days by the flag or RO to determine whether the ship is operating in accordance with the ISM Code. Provide decision to USCG prior to departure from port.

A ship when in a port of an offshore terminal of another party is subject to inspection by officers duly authorized by such party concerning operational requirements under this Annex , where there are clear grounds for believing that the master or crew are not familiar with essential shipboard procedures relating to the prevention of pollution by oil. During an expanded MARPOL exam, PSCO discovered debris in the starboard emergency bilge suction strainer, indicating discharge or oily water from the bilges. Upon further findings Captain stated (August 25, 2019) he was told flooding from the ship's cooling water pump filled the bilges up to the deck plates. The ship's installed emergency bilge pump was used to discharge the oily water to the sea. During review of the ship's logs, there was no indication of oily water discharge officially recorded.

**14121 - Suspected of discharge violation**

**A ship when in a port of another party is subject to inspection by officers duly authorized where there are clear grounds for believing that the master or crew are not familiar with shipboard procedures relating to the prevention of pollution by oil. During an expanded MARPOL exam, PSCO discovered oily water mixtures located inside the vessel's sewage treatment holding tank. PSCO believes the vessel treatment system and associated piping is contaminated as a result of unapproved oil discharge into the system. Ship's records did not align with PSCO's findings.**

Ship Name: **PAC ATHENA**

Ship Type: **General Dry Cargo Ship**

Flag: **Singapore**

IMO Number: **9262950**

Date of Action: **3/13/2019**

Action Taken: **Detention**

Port: **Fort Macon**

Unit: **Sector North Carolina**

Recognized Org: **Lloyd's Register**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Not Class Related**

Relevant Certificates:

Organization Related  
to Detention:

Ship Management: Owners, Operators, or Managers  
**PACC Ship Managers PTE Ltd**  
**Athena Maritime Pte Ltd**

Charterers

Deficiencies: Code - Category

**12109 - Special requirement**

Description

The carriage of solid bulk cargoes other than grain shall be in compliance with relevant provisions of the IMSBC Code. The vessel has 2,500 MT of Ferrosilicon (UN1408) loaded in cargo hold #2. PSCO noted that Ferrosilicon is not listed as a cargo permitted for carriage on the vessel's Solid Bulk Cargo Certificate of Compliance issued by Lloyds' Register. Mechanical ventilation for cargo hold #2 was not in operation during the exam, as required by the IMSBC Code. Additionally, it has been determined that the vessel's installed ventilation fans are not certified as explosion proof, which prohibits the vessel from providing mechanical ventilation to cargo hold #2 as required by the code. Vessel's inability to provide required ventilation poses a potential threat to the vessel and its crew.

**15102 - Company responsibility and authority**

The company should establish procedures to ensure that the ship is maintained in accordance with the provisions of the relevant rules and regulations established by the company. The vessel is not in substantial compliance with relevant conventions, the COTP questions the adequacy and/or implementation of the vessel's SMS under the ISM Code. PSCO questions whether the ship will be able to safely handle and carry its cargo throughout its forthcoming voyage. An external audit is recommended to be conducted within 30 days by the flag or RO to determine whether the ship is operating in accordance with the ISM Code.



Ship Name: **PAC ATHENA**

Ship Type: **General Dry Cargo Ship**

Flag: **Singapore**

IMO Number: **9262950**

Date of Action: **8/21/2019**

Action Taken: **Detention**

Port: **Corpus Christi, Texas**

Unit: **Sector Corpus Christi**

Recognized Org: **Lloyd's Register**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Class Related**

Relevant Certificates: **Safety Equipment**

**Safety Construction**

Organization Related  
to Detention: **Lloyd's Register**

Ship Management: Owners, Operators, or Managers  
**PACC Ship Managers PTE Ltd**

**Athena Maritime Pte Ltd**

Charterers

**PACC Container Line PTE LTD**

Deficiencies: Code - Category

**07116 - Ventilation**

**11134 - Operation of Life Saving  
Appliances**

**07101 - Fire prevention structural  
integrity**

**11110 - Stowage and provision of  
liferafts**

Description

**Structural fire protection, including fire-resisting divisions, and protection of openings and penetrations in these divisions shall be kept in good order so as to ensure their required performance if a fire occurs. 80 percent of all ventilator ducts from the bridge to the main deck are severely wasted, seized and unable to provide a complete seal due to the wastage, to include the emergency generator and CO2 storage space. As per SMS procedures, crew to provide maintenance monthly.**

**Recovery time of the rescue boat shall be not more than 5 min in moderate sea conditions when loaded with its full complement of persons and equipment. Rescue boat davit limit switch seized during the recovery of the rescue boat. As per SMS procedures, crew is to check condition of the limit switch every 3 months.**

**Air and overflow pipes and relief valves shall discharge to a position where there is no risk of fire or explosion from the emergence of oils and vapor. Multiple fuel vents on the deck and in the house found wasted, covers holed, and damaged flame screens. As per the vessel SMS procedures, the fuel vents are to be examined and checked operational monthly.**

**Before the ship leaves port and at all times during the voyage, all life-saving appliances shall be in working order and ready for immediate use. Four life rafts were found improperly stowed which would prevent the life rafts from floating free in the case of an emergency. As per the vessel's SMS procedures, crew to provide examination weekly.**

**15111 - Company verification,  
review and evaluation**

**Objective evidence discovered in an expanded ISM exam revealed the following major non-conformity; the vessel failed to fully implement the requirements of the SMS as evident by def. #01,#02, #03, and #04. An external audit is required.**





Ship Name: **PGC STRIDENT FORCE**

Ship Type: **LPG Gas Carrier**

Flag: **Portugal**

IMO Number: **9205574**

Date of Action: **3/25/2019**

Action Taken: **Detention**

Port: **Houston, Texas**

Unit: **Sector Houston-Galveston**

Recognized Org: **Nippon Kaiji Kyokai**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Not Class Related**

Relevant Certificates:

Organization Related  
to Detention:

Ship Management: Owners, Operators, or Managers

**Paradise Navigation S.A.**

**VOM Panama S.A.**

**European Mar II, LDA & Comandita  
(EUROMAR)**

Deficiencies: Code - Category

**06199 - Other (cargo)**

Description

**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, cargo liquid and vapour discharge and loading manifolds, and boundaries of superstructures and cargo compressor rooms (facing the cargo area) (11.3.1). The system should be capable of covering all areas mentioned in 11.3.1 with a uniformly distributed water-spray of at least 10 l/m2 per minute for horizontal projected surfaces and 4 l/m2 per minute for vertical surfaces (11.3.1).**

**Per the Certificate of Fitness, vessel is authorized carriage of multiple flammable and toxic products and has recently carried flammable products. Furthermore, vessel intended to load propylene upon completion of USCG port state control exam.**

**During operational test, PSCO noted that installed deck water spray system provided inadequate coverage to the following required locations: #1 and #2 cargo tank domes/exposed compressor room boundary, and boundary at front of superstructure.**

**06199 - Other (cargo)**

Electrical installations should be such as to minimize the risk of fire and explosion from flammable product [IGC 10.1.21]. Electrical equipment, cabled, and wiring should not be installed in hazardous locations unless it conforms with the standards not inferior to those acceptable to the Organization [IGC 10.1.4 refer to IEC 60092.502]. Cables shall enter in explosion protected enclosure only by means of a gland or equivalent device cable of maintaining the integrity of the enclosures [IEC 7.5.1].

Cable entrance to explosion-proof junction box for #2 cargo pump motor casing was found to be missing the appropriate gland or equivalent means, compromising the integrity of the enclosure.

Cable entrances to differential pressure switches, level switches for #1 and #2 intercoolers, and level switch for #2 knockout drum within the cargo compressor room found loose and exposed.

Both the #2 cargo pump motor casing and the switches in the cargo compressor room are located in hazardous locations (gas-dangerous zones, as defined by IGC 93.1.3.17).



Ship Name: **PIA OLDENDORFF**

Ship Type: **Bulk Carrier**

Flag: **Liberia**

IMO Number: **9464675**

Date of Action: **2/19/2019**

Action Taken: **Detention**

Port: **Corpus Christi, Texas**

Unit: **Sector Corpus Christi**

Recognized Org: **Lloyd's Register**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Not Class Related**

Relevant Certificates:

Organization Related  
to Detention:

Ship Management: Owners, Operators, or Managers

**Oldendorff Carriers GMBH & CO. KG**

**Interorient Marine Services (Germany) Gmbh**

Deficiencies: Code - Category

**15109 - Maintenance of the ship and equipment**

**02107 - Ballast, fuel and other tanks**

**13102 - Auxiliary engine**

**13106 - Insulation wetted through (oil)**

Description

Objective evidence discovered during an expanded ISM exam revealed the following non-conformities: The vessel failed to fully implement the equipment of the ISM code through their Safety Management System (SMS) procedures as evident by the following deficiencies indicating that the vessel and/or company are not meeting the SMS requirements. Recommend an external audit.

The company should establish procedures, plans and instruction including checklist as appropriate for key shipboard operations concerning safety of the personnel, ship and protection of the environment. The vessel SMS does not contain any checklist or procedures regarding material conditions relating to fire hazards in the engine room.

The condition of the ship and its equipment shall be maintained to conform with the provisions of the present regulations to ensure that the ship in all respects will remain fit to proceed to sea without danger to the ship or person on board. While PSCO was conducting round of engine room they observed a clear liquid that was identified as fuel oil coming from a 6 inch fracture in the #2 port MGO storage tank.

In a ship in which fuel oil and lube oil are used, the arrangements for storage, distribution and utilization of the fuel oil shall be such to end ensure the safety of the ship and person on board. #1 and #2 ship's service diesel generators are leaking fuel oil and lube oil in numerous areas presenting a serious fire risk.

In spaces where penetration of oil products is possible, the surface of insulation shall be impervious to oil or oil vapors. Due to a crack discharging diesel from the number 2 MGO storage tank the adjacent pipe became saturated covering 25-30 feet of lagging, creating a fire risk.

**13106 - Insulation wetted through (oil)**

In space where penetration of oil products is possible, the surface of insulation shall be impervious to oil or oil vapors. PSCO observe two areas of oil soaked lagging of the heavy fuel oil piping in the purifier room and adjacent machinery space, indicating potential leaks in the piping system.

**07126 - Oil accumulation in engine room**

The machinery, boilers and other pressure vessels, associated piping systems and fittings shall be of a design and construction adequate for the service for which they are intended and shall be so installed and protected as to reduce to a minimum any danger to persons on board, due regard being paid to moving parts, hot surfaces and other hazards. The design shall have regard to material used in construction, the purpose for which the equipment is intended the working conditions to which it will be subjected and the environmental conditions on board. PSCO observe an active oil leak coming from loose hardware on the #1 crankcase access cover creating a major fire safety hazard.



Ship Name: **PORT UNION**

Ship Type: **Chemical Tankship**

Flag: **Marshall Islands**

IMO Number: **9246451**

Date of Action: **8/28/2019**

Action Taken: **Detention**

Port: **Texas City, Texas**

Unit: **MSU Texas City**

Recognized Org: **DNV GL MARITIME**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Not Class Related**

Relevant Certificates:

Organization Related  
to Detention:

Ship Management: Owners, Operators, or Managers

**V. Ships Germany Gmbh & Co. KG**

**Novellas MT "St. Georg" Gmbh & Co. KG**

Charterers

**Sankt Georg Shipping Company Limited**

Deficiencies: Code - Category

**04102 - Emergency fire pump and its  
pipes**

**07102 - Inert gas system**

Description

In cargo ships of 2, 000 gross tons and upward, if a fire in any one compartment could put all the pumps out of action there shall be an alternative means consisting of a fixed independently driven emergency pump which shall be capable of supplying two objects of water to the satisfaction of the administration. PSCO found the emergency fire pump to be inoperable. Ship's crew replaced all relays with onboard parts and emergency fire pump operation was deemed satisfactory.

The inert gas system referred to in regulation 60 shall be designed, constructed and tested to the satisfaction of administration. It shall be so designed and operated as to render and maintain the atmosphere of the cargo tanks non-flammable at all times, except when required to be gas free. Inert gas low pressure alarm and pressure gauge found inoperable. Section 4.2.4 of the ship's inert gas manual requires a "Very low inert gas deck main pressure alarm" that will trip the cargo pumps to avoid vacuum pressure in the cargo tanks. The ship's crew could not determine the set point of this alarm and because the sensor could not read properly, this trip is unable to activate. According to the ship safety management system, The pressure alarm shall be activated at 200MM WG and shutdown the cargo pumps at 100MM WG. When bleeding all pressure from the sensor, the sensor reads 300MM WG and not 0 MM WG as it should. The low pressure alarm cannot be reset and is always active.



**15109 - Maintenance of the ship and equipment**

he company should established procedures to ensure that ship is maintained in conformity with provision of the relevant rules ad regulations and with any additional requirements which may be established by the company. The condition of the ship's fire prevention, fire-fighting, and cargo tank protection arrangements demonstrates a failure of the company to ensure effective implementation of the shipboard safety management system. Regular inspections on board the ship failed to discover discrepancies that pose hazards to the ship and its crew, and appropriate corrective actions were not taken in a timely manner. Marshall Islands is requiring the ship to undergo a safety management audit onboard the vessel by the ship's third party. The U.S. Coast Guard May, at their discretion, use this audit and finings to demonstrate rectification of ISM issues on board the vessel.

Ship Name: **PORT UNION**

Ship Type: **Chemical Tankship**

Flag: **Marshall Islands**

IMO Number: **9246451**

Date of Action: **9/30/2019**

Action Taken: **Detention**

Port: **St. Petersburg, Florida**

Unit: **Sector St Petersburg**

Recognized Org: **DNV GL MARITIME**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Not Class Related**

Relevant Certificates:

Organization Related  
to Detention:

Ship Management: Owners, Operators, or Managers

**V. Ships Germany Gmbh & Co. KG**

**Novellas MT "St. Georg" Gmbh & Co. KG**

Charterers

**Sankt Georg Shipping Company Limited**

Deficiencies: Code - Category

**14101 - Control of discharge**

**11117 - Lifebuoys incl. provision and disposition**

Description

The oil discharge monitoring and control system shall come into operation when there is any discharge of effluent into the sea and shall be such as will ensure that any discharge of oily mixture is automatically stopped when the instantaneous rate of discharge of oil exceeds that permitted by regulation 34 of this annex. PSCO observed the hull of the ship coated in oil and an active discharge of black oil into a U.S. navigable waterway and producing a sheen in the water below the discharge.

After any survey of the ship has been completed, no change shall be made in the structure, equipment, systems, fittings, arrangement or material covered by the survey without the sanction of the Administration. A short term IOPP was issued on 25SEP2019 after the vessel's OWS became non-functional. This certificate stated that until repair were made and tested all the conditions specified by flag be followed. One of the requirements was "All oily bilge water is retained on board for subsequent discharge to reception facilities. The quantity, time and port of discharge are recorded in the oil record book." The oil record book (ORB) Part 1 entries on 26SEP2019 includes the transfer of tank contents to slop tank (P) (FR: 43-47: 0.44 cubic meters from stern tube lube oil drain tank, 1.3 cubic meters from lube oil drain tank, 0.2 cubic meters from scavenge air drain tank, 8.2 cubic meters from sludge tank, and 8.9 cubic meters from oily bilge tank to slop tank (P). The oil record book part 2 contains an entry on 28SEP2019 discharging the contents from slop (P) through the ODME overboard. The vessel does not have any reception facility receipts after March 2018.

Ship Name: **PORT UNION**

Ship Type: **Chemical Tankship**

Flag: **Marshall Islands**

IMO Number: **9246451**

Date of Action: **10/16/2019**

Action Taken: **Detention**

Port: **Port Canaveral, Florida**

Unit: **MSD PORT CANAVERAL**

Recognized Org: **DNV GL MARITIME**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Class Related**

Relevant Certificates: **Safety Equipment**  
**Safety Construction**

Organization Related **DNV GL MARITIME**  
to Detention:

Ship Management: Owners, Operators, or Managers  
**V. Ships Germany Gmbh & Co. KG**  
**Novellas MT "St. Georg" Gmbh & Co. KG**

Deficiencies: Code - Category

**01101 - Cargo ship safety equipment  
(including exemption)**

Description

**Before the ship leaves port and at all times during the voyage all life-saving appliances shall be in working order and read for immediate use. After multiple attempts, ship's crew was unable to start the lifeboat #1 engine, nor troubleshoot the issues.**

**04114 - Emergency source of power -  
Emergency generato**

**Each emergency generating set arranged to be automatically started shall be equipped with starting devices approved by the Administration. A second source of energy shall be provided for an additional three starts with 30 minutes unless manual starting can be demonstrated to be effective. After multiple attempts, Chief Engineer and Second Engineer were unable to start the emergency generator with the secondary spring loaded means of starting.**

**06105 - Atmosphere testing  
instruments**

**Where liquid cargoes introduce additional fire hazards, additional safety measures shall be required to the satisfaction of the Administration, having due regard to the provision of the International Bulk Chemical Code. Sample point or detector heads should be located to readily detect potentially dangerous leakages. PSCO observed a reoccurring "pump failure, low flow" alarm fault for the fixed gas detection system.**

**07102 - Inert gas system**

**The inert gas system shall be designed, constructed and tested to the satisfaction of Administration. It shall be so designed and operated as to render and maintain the atmosphere of the cargo tanks non-flammable at all times, except when required to be gas free. The inert gas system was not operating as designed due to constantly activation of low pressure alarm which cannot be reset. Additionally, the pressure gauge was observed to rapidly fluctuate between positive and negative pressure.**



Ship Name: **PREMIUM DO BRASIL**  
Ship Type: **Refrigerated Cargo Carrier**  
Flag: **Liberia**  
IMO Number: **9242089**  
Date of Action: **1/8/2019**  
Action Taken: **Detention**  
Port: **St. Petersburg, Florida**  
Unit: **Sector St Petersburg**

Recognized Org: **DNV GL MARITIME**  
Recognized Security Organization (RSO):  
Recognized Org (RO) Related: **Not Class Related**  
Relevant Certificates:  
Organization Related to Detention:  
Ship Management: Owners, Operators, or Managers  
**Exmar Shipmanagement NV**  
**Premium International Shipping Corporation**  
Charterers  
**Citrosuco, Paulista**

Deficiencies: Code - Category  
**15109 - Maintenance of the ship and equipment**

Description  
**Objective evidence discovered during an expanded ISM exam revealed the following non-conformities. These discrepancies included with the other material deficiencies are evidence that crew/company are not meeting the SMS requirements. Recommend an external audit.**

**01 - The company should establish procedures to ensure that the ship is maintained in conformity with the provision of the relevant rules and regulations. In meeting these requirements, the company should ensure that any non-conformity is reported; and appropriate corrective action is taken. PSCO observed soft patches in the engine room on the auxiliary salt water line and the #4 main engine cylinder fuel pump drain line. The patches were not approved by the vessel's class nor were there any corrective actions taken IAW the vessel's SMS.**

**02 - The company should establish procedures to ensure that the ship is maintained in conformity with the provisions of the relevant rules and regulations. In meeting these requirements, the company should ensure that any non-conformity is reported and appropriate corrective action is taken. PSCO also observed a flexible hose installed in the drain line from fuel oil hot box which was not of approved material, nor were there any corrective action taken IAW the vessel's SMS.**

**03 - The company should establish procedures to ensure that the ship is maintained in conformity with the provision of the relevant rules and regulations. In meeting these requirements, the company should ensure that any non-conformity is reported and appropriate corrective action is taken. The main engine was observed to have fuel soaked lagging, piping and housing in the vicinity of the fuel pumps. Additionally, in the automatic fuel filter area, fuel spray was apparent and observed on the ceiling, covering the piping and the lagging, and inside the electrical control boxes for the automatic fuel filter system. Being a reoccurring issue, a plastic curtain was installed around the system to shield the rest of the engine room from the fuel spray. No**

corrective action taken IAW the vessel's SMS.

**04 - The company should establish procedures to ensure that the ship is maintained in conformity with the provisions of the relevant rules and regulations. In meeting these requirements, the company should ensure that any non-conformity is reported; and appropriate corrective action is taken. PSCO observed an approximately 15 inch crack in the crank case housing of the main engine. PSCO observed documentation showing that the crack had been reported on January 18, 2018, but no non-conformity report have been filed or corrective actions have been implemented.**

**05 - The company should establish procedures, plans and instructions, including checklist as appropriate for key shipboard operations. Crew members were assigned a number and not all crew members knew their assigned number or duties. Additionally, muster list does not instruct fire fighting team to carry radios as per 74SOLAS (14 Cons). Furthermore, PSCO discovered vessel was not conducting enclosed space entry and rescue drills as required by 74SOLAS (14 Cons). Vessel was unable to produce sufficient procedures or checklist for training an ensuring personnel knew what to do in the event of an emergency.**

**06 - The company should establish procedures to ensure that the ship is maintained in conformity with the provision of the relevant rules and regulations. All items of rescue boat equipment shall be secured within the rescue boat. PSCO observed all required equipment was stored in a separate locker on deck away from the rescue boat.**

**07126 - Oil accumulation in engine room**

**In a ship in which fuel oil is used, the arrangements for the storage, distribution and utilization of the fuel oil shall be such as to ensure the safety of the ship and persons onboard. PSCO observed an overall hazardous condition of the engine room. PSCO observed the main engine to have fuel soaked, lagging, piping, and housing in the vicinity of the main engine fuel pumps. Additionally, in the automatic fuel filter area, a history of fuel spray was apparent and observed on the ceiling, covering the piping and lagging, and inside the electrical control boxes for the automatic fuel filter system. Being a reoccurring issue, a plastic curtain was placed around the system.**

Ship Name: **PRINS ALEXANDER**

Ship Type: **LPG Gas Carrier**

Flag: **Marshall Islands**

IMO Number: **9242209**

Date of Action: **11/6/2019**

Action Taken: **Detention**

Port: **Texas City, Texas**

Unit: **MSU Texas City**

Recognized Org: **Bureau Veritas**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Not Class Related**

Relevant Certificates:

Organization Related  
to Detention:

Ship Management: Owners, Operators, or Managers

**Atlantc Gas AS**

**Anthony Veder Rederijzaken B.V.**

Charterers

**Geogas Trading SA**

Deficiencies: Code - Category

**12107 - Fire protection cargo deck  
area**

Description

**On ships carrying flammable or toxic products or both, a water spray system for cooling, fire prevention, an crew protection should be installed to cover exposed cargo tank domes, exposed on deck storage vessels, cargo liquid an vapor discharge, and loading manifolds.**

**The system should be capable of covering all area with a uniformly distributed water-spray.**

**Insufficient water spray coverage was observed over tank dome #1, type "C" tanks 1 and 2 on deck, and both cargo manifolds. A rupture was also observed in the deck water spray piping leading to the port manifold.**

Ship Name: **SARI INDAH**

Ship Type: **Bulk Carrier**

Flag: **Singapore**

IMO Number: **9624964**

Date of Action: **4/27/2019**

Action Taken: **Detention**

Port: **Portland, Oregon**

Unit: **Sector Columbia River**

Recognized Org: **Lloyd's Register**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Not Class Related**

Relevant Certificates: **Safety Equipment**

Organization Related  
to Detention: **Lloyd's Register**

Ship Management: Owners, Operators, or Managers  
**MSI Ship Management PTE LTD.**  
**Sari Indah PTE. LTD.**

Charterers  
**Ocean 21 Holdings Pte Ltd**

Deficiencies: Code - Category

**07109 - Fixed fire extinguishing  
installation**

**15109 - Maintenance of the ship and  
equipment**

Description

**Fire-fighting systems and appliances shall be kept in good working order and readily available for immediate use. The fixed CO2 fire-fighting system was found with a branch line not connected to a CO2 bottle to the discharge manifold and several places where the branch lines were chaffed with wire braiding exposed.**

**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. Objective evidence during an expanded ISM exam revealed that the crew was not accurately following the ship's procedures with regard to the inspecting of the CO2 bottle storage room. It is recommended that an external third party audit of the SMS be conducted with regard to deficiency No. 1.**



Ship Name: **SELECAO**

Ship Type: **Oil Tankship**

Flag: **Liberia**

IMO Number: **9388297**

Date of Action: **1/22/2019**

Action Taken: **Detention**

Port: **Los Angeles, California**

Unit: **Sector Los Angeles-Long Beach**

Recognized Org: **American Bureau of Shipping**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Not Class Related**

Relevant Certificates:

Organization Related  
to Detention:

Ship Management: Owners, Operators, or Managers

**Tsakos Columbia Shipmanagement (TCM)  
S.A.**

**Bayswater Trading Co Ltd**

Charterers

**FLOPEC EP**

Deficiencies: Code - Category

**07114 - Remote Means of control  
(opening,pumps,ventila**

Description

**Fire-fighting systems and appliances shall be kept in good working order and readily available for immediate use. Ship's crew failed to remove the metal blocking piece after testing the H.F.O. SERV TK to M/E & G/E F.O. Supply P/P quick closing valve on 03DEC2018. Ship continued to use HFO until switching over to low Sulphur fuel on 25DEC2018. PSCO identified metal blocking piece still in place during exam. In the event of an engine room fire, the quick closing valve would not be able to fully close as designed and HFO would continue to be supplied potentially supporting the fire in the space. The remote actuator for the valve would be ineffective.**

Ship Name: **SHIMANAMI QUEEN**

Ship Type: **Bulk Carrier**

Flag: **Panama**

IMO Number: **9589786**

Date of Action: **6/12/2019**

Action Taken: **Detention**

Port: **Portland, Oregon**

Unit: **Sector Columbia River**

Recognized Org: **Nippon Kaiji Kyokai**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Class Related**

Relevant Certificates: **Safety Equipment**

Organization Related  
to Detention: **Nippon Kaiji Kyokai**

Ship Management: Owners, Operators, or Managers

**Misuga Kaiun Co., Ltd**

**Seavance Shipping S.A.**

Charterers

**Trafigura Maritime Logistics PTE**

Deficiencies: Code - Category

**07109 - Fixed fire extinguishing  
installation**

Description

**Fire-fighting systems and appliances shall be kept in good working order and readily available for immediate use. Observed 12 of 24 high expansion foam nozzles in the engine room and engine control room clogged, corroded, or leaking.**

Ship Name: **TOKI ARROW**

Ship Type: **Bulk Carrier**

Flag: **Panama**

IMO Number: **9434539**

Date of Action: **2/7/2019**

Action Taken: **Detention**

Port: **Portland, Oregon**

Unit: **Sector Columbia River**

Recognized Org: **Nippon Kaiji Kyokai**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Not Class Related**

Relevant Certificates:

Organization Related  
to Detention:

Ship Management: Owners, Operators, or Managers

**Faith Marine Limited**

**Million Comets S.A.**

Charterers

**Gearbulk Pool Ltd**

Deficiencies: Code - Category

**07124 - Maintenance of Fire  
protection systems**

**15109 - Maintenance of the ship and  
equipment**

Description

**Fire-fighting systems and appliances shall be kept in good working order and readily available for immediate use. Approximately 100 out of 122 installed CO2 actuators were found with safety pins in place, which rendered the CO2 system inoperable as indicated in the systems' operations manual.**

**TThe company should establish procedures to ensure that the ship is maintained in conformity with the provision of the relevant rules and regulations and with any additional requirements which may be established by the company. Objective evidence during an expanded ISM exam revealed that the ship's procedures related to the inspection of installed CO2 fire-fighting system do not provide enough detail to ensure adequate inspection of the CO2 system by the crew. In addition, the crew is not knowledgeable of CO2 system operations manual. It is recommended that an external third party audit of the SMS be conducted with regard to deficiencies No. 01 and No. 02.**

Ship Name: **TOPAZ EXPRESS**

Ship Type: **Oil Tankship**

Flag: **Hong Kong**

IMO Number: **9552800**

Date of Action: **7/9/2019**

Action Taken: **Detention**

Port: **Honolulu, Hawaii**

Unit: **Sector Honolulu**

Recognized Org: **American Bureau of Shipping**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Not Class Related**

Relevant Certificates:

Organization Related  
to Detention:

Ship Management: Owners, Operators, or Managers

**Bernhard Schulte Shipmanagement  
(Singapore) PTE. L**

**Winmar Shipping LTD**

Deficiencies: Code - Category

**14121 - Suspected of discharge  
violation**

**01315 - Oil record book**

Description

**The oil record book part I 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 accumulated in machinery spaces. PSCO received cause to believe a transfer was made from the aft engine room bilge well to the clean drain tank via a portable pump.**

**Each operation described in paragraph 2 of this regulation shall be fully recorded without delay in the oil record book part 1, so that all entrees in the book appropriate to that operation are completed. Each completed operation shall be signed by the officer or officers in charge of the operations concerned and each completed page shall be signed by the master of ship. A transfer from the aft engine room bilge well to the clean drain tank was not recorded in the oil record book part I.**

Ship Name: **TRANSPORT**

Ship Type: **General Dry Cargo Ship**

Flag: **Saint Vincent and the Grenadines**

IMO Number: **7122572**

Date of Action: **12/13/2019**

Action Taken: **Detention**

Port: **Miami, Florida**

Unit: **Sector Miami**

Recognized Org: **Not Classed**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Not Class Related**

Relevant Certificates:

Organization Related  
to Detention:

Ship Management: Owners, Operators, or Managers

**Morton & Company**

**Ariane Shipping Corporation**

Deficiencies: Code - Category

**14605 - Type approval certificate of  
incinerator**

Description

**Shipboard incineration shall be allowed only through only through the use of an approved shipboard incinerator. During the PSC exam, the PSCO discovered a metal drum suspect to be used by the crew to incinerate garbage. Upon further inquiry, the Master state that the crew uses the drum for incineration. The garbage record book show multiple entries for the incineration of garbage from 5/21/14 to 11/24/19. The IAPP also states that the ship is not outfitted with shipboard incinerator. Furthermore, the ship's flag administration has issued an attestation letter stating the vessel is not outfitted with an approved shipboard incinerator.**

Ship Name: **TRIUMPH-R**

Ship Type: **Towboat/Tug**

Flag: **St.Kitts & Nevis**

IMO Number: **8954350**

Date of Action: **10/29/2019**

Action Taken: **Detention**

Port: **St. Thomas, USVI**

Unit: **MSD ST. THOMAS, USVI**

Recognized Org: **Not Classed**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Not Class Related**

Relevant Certificates:

Organization Related  
to Detention:

Ship Management: Owners, Operators, or Managers  
**C & G Rentals Ltd**

Charterers  
**Bruce Devon**

Deficiencies: Code - Category

**01209 - Manning specified by the  
minimum safe manning**

**03105 - Covers (hatchway-, portable-  
, tarpaulins, etc.**

Description

**Verification that the numbers and certificates of the seafarers serving on board are in conformity with the applicable safe manning requirements of the Administration. Vessels minimum safe manning certificate issued, indicates 01 deck officer with a STCW rating of II/3 is required. Vessel sailed from Plymouth, Montserrat to St. Thomas without the II/3 deck officer.**

**The administration shall satisfy itself that the general structural strength of the ship is adequate for the draught corresponding to the freeboard assigned. Port side forward most deck prism on the main watertight deck, directly above berthing area, has been modified and temporarily repaired with wood cover creating a potential down flooding point and affecting hull seaworthiness.**

Ship Name: **UNITED HARMONY**

Ship Type: **Bulk Carrier**

Flag: **Panama**

IMO Number: **9755672**

Date of Action: **10/29/2019**

Action Taken: **Detention**

Port: **New Orleans, Louisiana**

Unit: **Sector New Orleans**

Recognized Org: **Nippon Kaiji Kyokai**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Not Class Related**

Relevant Certificates:

Organization Related  
to Detention:

Ship Management: Owners, Operators, or Managers  
**Canaveral Marine Corporation**  
**H & J Marine Inc.**

Charterers  
**ADM Intermare**

Deficiencies: Code - Category  
**04114 - Emergency source of power -  
Emergency generato**

Description  
**A self-contained emergency source of electric power shall be provided. PSCO observed that emergency generator would not operate due to No. 3 F.O. injection valve being damaged during maintenance due to heavy corrosion on 11 October 2019. Vessel is restricted from movement.**

Ship Name: **YM RIGHTNESS**

Ship Type: **Bulk Carrier**

Flag: **Liberia**

IMO Number: **9287780**

Date of Action: **4/3/2019**

Action Taken: **Detention**

Port: **Portland, Oregon**

Unit: **Sector Columbia River**

Recognized Org: **American Bureau of Shipping**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Not Class Related**

Relevant Certificates:

Organization Related  
to Detention:

Ship Management: Owners, Operators, or Managers

**Kuang Ming Shipping Corp**

**Chailease International Financial Services Corp**

Deficiencies: Code - Category

**03104 - Cargo & other hatchways**

**04114 - Emergency source of power -  
Emergency generato**

**15109 - Maintenance of the ship and  
equipment**

Description

The means for securing and maintaining weather tightness shall be to the satisfaction of the administration and shall ensure that the tightness can be maintained in any sea conditions. 12 out 152 cargo hold hatch securing devices are either seized and/or broken, which prevents the ability to secure the cargo hold and maintain weathertightness.

The electrical power available shall be sufficient to supply all those serviced that are essential for safety in an emergency, due regard being paid to such services as may have to be operated simultaneously. The emergency generator has a significant water leak from the fresh water cooling feed line and in five minutes of operation the water gauge dropped from operational levels to low levels.

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. Objective evidence during an expanded ISM exam revealed that the crew was not accurately following the ship's procedures with regard to external examination of the closed hatch covers and securing arrangements. In accordance with ship's SMS, the master shall ensure that the cargo hatches and securing arrangements are fit for the intended voyage and are examined at least once week, weather permitting. At least three consecutive log entries for examination of securing arrangements were documented as "Normal," and signed by the master, chief officer and chief engineer. In addition, the crew did not properly repair and did not report the condition of the marine sanitation device tank to the master. Various holes ranging in size from 1" - 3" in diameter were found on the top side of the tank and were extemporarily repaired with tape and paint. It is recommended that a external third party audit of the SMS be conducted with regard to deficiencies No.1, No. 2. and No. 4.



Ship Name: **ZAO GALAXY**

Ship Type: **Chemical Tankship**

Flag: **Marshall Islands**

IMO Number: **9566160**

Date of Action: **2/11/2019**

Action Taken: **Detention**

Port: **San Francisco, California**

Unit: **Sector San Francisco**

Recognized Org: **Nippon Kaiji Kyokai**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Not Class Related**

Relevant Certificates:

Organization Related  
to Detention:

Ship Management: Owners, Operators, or Managers  
**FGL Moon Marshall Limited**  
**Unix Line PTE Ltd.**

Deficiencies: Code - Category

**14107 - Oil disch. Monitoring and  
control system**

**15105 - Resources and personnel**

**13105 - UMS - Ship**

Description

The oil filtering equipment referred to in paragraph 2 of this regulation shall comply with paragraph 6 of this regulation. Additionally, the oil filtering equipment shall be provided with alarm arrangements which indicate when the oil content exceeds 15 ppm and this level cannot be maintained. The system shall also be provided with arrangements to ensure that any discharge of oily mixtures is automatically stopped when the oil content of the effluent exceeds 15 ppm. While witnessing the operation test of the Oily Water Separator (OWS) and Oil content Meter (OCM), the PSCO observed the oil content effluent reading on the OCM exceeded 15 ppm without automatically stopping and effluent continue to flow past the three way valve to the overboard valve.

A ship when in a port of an offshore terminal of another Party is subject to inspection by officers duly authorized by such Party concerning operational requirements under this Annex, where there are clear grounds for believing that the master or crew are not familiar with essential shipboard procedures relating to the prevention of pollution by oil. The PSCO requested the First Engineer to demonstrate operation of the Oily Water Separator (OWS), the First Engineer did not know how to operate the OWS and it took over 30 minutes to get the system started with other crew assistance. In accordance with ship's procedures the First Engineer is responsible for operating and testing the OWS. Additionally, the First Engineer did not know the reason why the equipment would not operate in recirculation mode, when the mode, when the OCM showed a reading above 15ppm and effluent continued to flow past the three way valve to the overboard valve.

Each operation described in paragraph 2 of this regulation shall be fully recorded without delay in the Oil Record Book Part I, so that all entries in the book, appropriate to that operation, are completed. Upon review of the Oil Record Book Part I by the PSCO, it was determined that approximately 169.5 gallons of waste oil/oily mixtures were unaccounted for in the ship's ORB and the First Engineer did not have documentation or receipts of waste oil/oily mixtures being disposed to a reception (shore side) facility.

Ship Name: **ZIM CONSTANZA**

Ship Type: **Containership**

Flag: **Israel**

IMO Number: **9471202**

Date of Action: **5/13/2019**

Action Taken: **Detention**

Port: **Staten Island, New York**

Unit: **Sector New York**

Recognized Org: **Lloyd's Register**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Not Class Related**

Relevant Certificates:

Organization Related  
to Detention:

Ship Management: Owners, Operators, or Managers  
**TACTON SHIPPING INC**  
**XT Management LTD.**

Charterers  
**Zim Integrated Shipping Services Ltd**

Deficiencies: Code - Category

**15102 - Company responsibility and  
authority**

Description

The company should establish procedures for the implementation of corrective action, including measures intended to prevent recurrence. Since the previous US Coast Guard detention of the vessel in May 2018 for excessive amounts of oily mixtures in the engine room, the company failed to take any measures to prevent recurrence. Excessive oil was observed around the main engine, in the fuel oil purifier room, underneath the main engine lube oil purifier, in the engine room bilges, and under the shaft.

**15104 - Masters responsibility and  
authority**

The company should establish in the Safety Management System that the Master has the overriding authority and the responsibility to make decisions in respect to safety and pollution prevention and to request the company's assistance as may be necessary. The Master failed to implement the safety policy on the vessel. Multiple maintenance requirements for equipment in the engine room are overdue. Crewmember observed Emergency Generator unable to start by secondary means and notified the Chief Engineer. The Chief Engineer failed to notify anyone else of the observation.

**07126 - Oil accumulation in engine  
room**

Means shall be provided to control leaks of flammable liquids. The vessel had excessive amounts of oily mixtures in bilges from leaking; main engine, generators, fuel oil purifiers, lube oil purifiers, and shaft seal. Oil soaked lagging was observed around fuel pumps on Main engine and in the Purifier room. Additionally, the main engine had pooled oil around the fuel pumps, cylinder heads, and lube oil exhaust lines.

Ship Name: **ZIM VIRGINIA**

Ship Type: **Containership**

Flag: **Israel**

IMO Number: **9231808**

Date of Action: **7/26/2019**

Action Taken: **Detention**

Port: **Charleston, South Carolina**

Unit: **Sector Charleston**

Recognized Org: **American Bureau of Shipping**

Recognized Security  
Organization (RSO):

Recognized Org  
(RO) Related: **Not Class Related**

Relevant Certificates:

Organization Related  
to Detention:

Ship Management: Owners, Operators, or Managers  
**Zim Integrated Shipping Services Ltd**  
**Ymir International Limited**

Deficiencies: Code - Category

**07105 - Fire doors/openings in fire-resisting division**

**07199 - Other (fire safety)**

**07105 - Fire doors/openings in fire-resisting division**

**01201 - Certificates for master and officers**

Description

**In addition to complying with the specific provision for fire integrity of bulkhead and decks mentioned elsewhere in the part, the minimum fire integrity of bulkheads and decks shall be prescribed in tables 44.1 and 44.2. The class 'A' fire boundaries of the purifying room were not maintained due to holes or fractures in both bulkheads at the door frames and the fire door not closing properly.**

**In a ship in which oil fuel is used, the arrangement 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. #1 supply booster pump for MGO purifier has an excessive leak on the mechanical seal causing a serious fire hazard. Purifier room has severe degradation fire boundaries.**

**Doors fitted in boundary bulkheads of machinery spaces of category A shall be reasonably gastight and self-closing. The two of the engine room doors leading to the main deck accommodation spaces were damaged and no longer functional.**

**Deficiencies which may be deemed to pose a danger to persons, property or the environment include the following: failure of seafarer to hold a certificate, to have an appropriate certificated, to have a valid dispensation or to provide documentary proof that an application for an endorsement has been submitted to the administration in accordance with regulation I/10, paragraph 5. The third deck officer, third engineering officer and fourth engineering officer, does not have proper flag state endorsement.**

