Ship Name: CONTINENTAL HIGHWAY
Ship Type: Ro-Ro-Cargo Ship
Flag: Panama
IMO Number: 9238519
Date of Action: 2/18/2020
Action Taken: Detention
Port: Los Angeles, California
Unit: Sector Los Angeles-Long Beach

Deficiencies: Code - Category
07109 - Fixed fire extinguishing installation

Description
The necessary pipes for conveying fire-extinguishing medium into protected spaces shall be provided with control valves so marked as to indicate clearly the spaces to which the pipes are led. Suitable provisions shall be made to prevent inadvertent admission of the medium to any space. PSCO identified the valve on the service line for the low-pressure CO2 system to be in the open position and with no blanking flange. The pressurization of the CO2 manifold would cause the low-pressure CO2 room to be inadvertently filled with CO2 and present a danger to life in the space an the local operating station.
The company and the ship shall comply with the requirement of the International Safety Management Code. For the purpose of this regulation, the requirements of the code shall be treated as mandatory. 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 appropriate corrective action is taken; and records of these activities are maintained. 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 requirement. Recommend external audit. PSCO identified the valve on the service line for the low-pressure CO2 system to be in the open position and with no blanking flange. The release of CO2 from the system would cause the space to be filled with CO2 and present a danger to life in that space. Date of last servicing on the system was in August 2018, and the crew indicated that the system may have been altered at dry-dock in August 2019, it is unknown how long the service line on the low-pressure CO2 system was open, but potentially months. The ship's maintenance check list for the CO2 system outlines weekly and monthly checks which includes verifying valves are in the proper position. While the inspection was being done on a weekly basis, the valve on the servicing line remained open and presented a hazardous condition.