



# Marine Safety Information Bulletin

Commandant  
U.S. Coast Guard  
Office of Commercial Vessel Compliance  
2703 Martin Luther King Jr Ave, SE, STOP 7501  
Washington, DC 20593-7501

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Contact: CG-CVC  
Phone: (202) 372-1251  
E-Mail: portstatecontrol@uscg.mil

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## USCG Port State Control Detention Deficiency Areas

This bulletin addresses the top five deficiency areas that U.S. Coast Guard Port State Control Officers (PSCOs) find on foreign vessels and that have led to detentions in 2015. The purpose of this bulletin is to share this information so that owners, operators, and other involved parties can take proactive steps to identify and correct sub-standard conditions of safety and environmental stewardship, before port state control action is necessary.

### 1. Maintenance of Ship and Equipment – ISM Code

Numerous minor deficiencies may lead to expanded Coast Guard PSC exams. Within the expanded exam, there is frequently a conclusion that there were safety management system (SMS) failures and the PSCO subsequently detained the vessel. The vessel's master should ensure on board maintenance and drills are carried out and documented as required by the International Safety Management (ISM) and the International Ship and Port Facility Security (ISPS) Codes.

### 2. Oily Water Separating (OWS) Equipment - MARPOL

Vessel crews must ensure the proper operation of the OWS and be able to operationally test the system ensuring alarms and automatic stopping devices are in proper working order. In addition, unauthorized piping or modifications made to the system are unacceptable. Oil record books must also be kept and ensure all entries are made, per the guidance in MARPOL Annex I.

### 3. Fixed Firefighting Installation - SOLAS

Fixed water based fire-fighting systems that protect periodically-unattended machinery spaces must be properly charged in accordance with vessel's SMS procedures, SOLAS, flag state, and class requirements.

### 4. Rescue Boats - SOLAS

Life saving appliances shall be in working order and ready for immediate use before the ship leaves port and at all times during the voyage, per SOLAS Chapter III Regulation 20.2. PSCOs have discovered a number of vessels' rescue boats not meeting this standard. Additionally, in several cases, the rescue boat launching arrangements were unable to launch or retrieve the rescue boat.

### 5. Fire Detection Equipment - SOLAS

The common item leading to a detention for fire detection systems involves the smoke detectors. In many cases smoke detectors were simply discovered to be inoperable with no record of being tested, or, the detectors were found covered with plastic thus eliminating their value.

These five items are not all inclusive and in no way cover the entire scope of detainable deficiencies found during PSC examinations. They merely represent a top view summary of what Coast Guard PSCOs have discovered throughout this past year. The Coast Guard's 2015 PSC Annual Report will provide greater analysis of these topics and detainable deficiencies in general. Vessels are reminded that if any system on board the vessel is not in good working condition, the crew should take the necessary actions to remedy the situation in accordance with their SMS. A record of any actions taken should be maintained as evidence that the SMS is being used effectively in conjunction with all routine maintenance programs.

Questions regarding this bulletin should be forwarded to the Office of Commercial Vessel Compliance (CG-CVC) at **202-372-1251** or by email at [portstatecontrol@uscg.mil](mailto:portstatecontrol@uscg.mil). This bulletin is provided for informational purposes only and does not relieve vessel owners/operators from any domestic or international safety, operational or material requirement.

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