

Republic of the Marshall Islands

MARITIME ADMINISTRATOR

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MARINE SAFETY ADVISORY NO. 21-18

To: Owners/Operators, Masters, and Chief Engineers

Subject: THE IMPORTANCE OF COMPLETING THE CRITICAL ITEMS CHECKLIST PRIOR TO ARRIVAL IN UNITED STATES PORTS

Date: 02 August 2018

This Marine Safety Advisory (MSA) underscores the requirement for and importance of completing, verifying and submitting the *Critical Items Checklist* (RMI Form [MSD 340](#)) prior to arrival in any US Port. It provides an update on deficiencies in the US, including examples that have led to detentions. MSA No. 51-17 is revoked and superseded by this MSA.

Deficiency and Detention Trends

In 2017 the RMI fleet had five (5) U.S. Coast Guard (USCG) detentions in total. This compares with six (6) USCG detentions from January through July 2018. There has also been a very recent surge in detentions for fuel oil leaks in the engine room. Evidence of fuel oil leaks or oil soaked lagging in the engine room is being treated as an automatic “code 30” detainable item, no matter how slight the leak. This item along with the other items on the critical items checklist must be carefully looked at and resolved prior to entry to a US Port.

The Critical Items Checklist

The checklist’s purpose is to accurately reflect the status of the critical items that may lead to an unsafe condition or port State control (PSC) detention onboard an RMI ship. The requirement for filling out the Critical Items Checklist is contained in RMI Marine Notice [5-034-5](#), *Measures to Improve Compliance of Republic of the Marshall Islands Flagged Vessels in United States Ports* which states:

Prior to arrival in a U.S. port, the Master and Chief Engineer shall complete, sign, and submit the Critical Items Checklist (RMI Form MSD 340). The Critical Items Checklist and the requirements for its use are intended by the RMI Maritime Administrator to ensure that Masters, Chief Engineers and all persons-in-charge verify critical and essential shipboard safety, security, and environmental protection items are in working or operational condition and the applicable national and international standards are met prior to entry into a U.S. port. Failure to complete the MSD 340 may be cause for suspension of the officers’ RMI seafarer documents and/or an additional audit of the vessel or Company SMS.

This MSA expires one (1) year after its issuance, unless otherwise noted, extended, superseded, or revoked.

An informative Critical Items Checklist video is available at: <https://www.register-iri.com/index.cfm?action=page&page=240>.

Detainable Deficiencies

Deficiencies that have led to detentions on RMI vessels, include:

- Quick Closing Valves intentionally blocked or disconnected;
- Insufficient pressure from emergency fire pump;
- Emergency generator failed to start in automatic or manual mode;
- Crew unable to launch the lifeboat;
- Inflatable life rafts with hydrostatic release units not properly attached so that they could “float free”;
- Rescue boat engine was not able to start;
- Gas sampling lines disconnected during cargo operations;
- Hyper-mist systems set to manual mode or in the off position or sea suction valves closed during the PSC exam;
- Smoke detectors blocked, covered up, or inoperable;
- Lack of familiarity with the OWS;
- Oil Record Book (ORB) not accurately being maintained. The historical data on the 107(49) OCM did not match the ORB written entries;
- Poor performance during the fire, abandon ship, and confined space entry and rescue drills;
- Inoperative Inert Gas System;
- Excessive fuel oil leaks and oil-soaked lagging;¹ and
- Blocked or clogged deck water spray nozzles on LPG vessels.

ACTION

The Critical Items Checklist is essential to avoiding unsafe conditions onboard RMI-flagged vessels. It helps to prepare the vessel for its arrival into port, the goal of which is to assist in identification and elimination of any substandard conditions onboard that may be hazardous or lead to detention of the vessel.

Masters and Chief Engineers are reminded to accurately complete, verify and certify the Critical Items Checklist.

¹ This is often a subjective determination, so it is better not to have leaks or oil-soaked lagging. US PSC authorities are paying strict attention to fire hazards in the engine room, generator flat, purifier flat, and in other locations around the ship. The focus on these systems may be related to marine casualty analyses and review wherein fire hazards, control systems, and SMS failures are undergoing greater scrutiny. These fire-related deficiencies that result in detentions are avoidable with proper maintenance and housekeeping procedures, reporting, and vigilance in maintaining fire protection barriers and systems in constant working order.