

Oil Companies International Marine Forum

Revised Ship Inspection Report (SIRE) Programme

Report Number HCCJ-3047-7117-7081

Report Template VIQ7 - Petroleum (4401)

Vessel Name PUSAKA PRIMA

IMO Number 9154141

Date of Inspection 20 Feb 2024

Port of Inspection Malaysia Port Klang (Pelabuhan Klang) [MYPKG]

Inspecting Company PREEM AB (publ)

Selected variants Pumproom

STS operations

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Section 1

Chapter 1: General Information

General Information

1.1	Name of the vessel:	PUSAKA PRIMA
1.2	Vessel IMO Number:	9154141
1.3	Date the inspection was completed:	20 Feb 2024
1.4	Was a full inspection of the vessel completed	Yes
1.5	Port of inspection:	Malaysia Port Klang (Pelabuhan Klang) [MYPKG]
1.6	Flag:	Malaysia
1.7	Deadweight: (metric tonnes)	4147.00
1.8	Date the vessel was delivered:	27 Nov 1996
1.9	Name of the OCIMF inspecting company:	PREEM AB (publ)
1.10	Date and time the inspector boarded the vessel	20 Feb 2024. 08:20 (UTC +08:00)
1.11	Date and time the inspector departed the vessel	20 Feb 2024. 18:15 (UTC +08:00)
1.12	Time taken for inspection.	9.15
	Other Inspector Comments: A 40 minute lunch break was taken.	
1.13	Name of the inspector:	For inspecting company only
1.14	Is an up to date OCIMF Harmonised Vessel Particulars Questionnaire (HVPQ) maintained and is it readily available?	No

Other Inspector Comments: The following information was not correctly updated in the HVPQ:

- a) 1.1.13.3 The amount of P&I cover was stated as USD 100 Million instead of USD 1 Billion.
- b) 1.2.2 The vessel was issued with EEXI rating, however, it was not included.
- c) 1.3.2.12 The name of the previous operator was not included.
- d) 4.1.1 The vessel was not provided with a Bow Thruster, however, it was incorrectly stated fitted with a Bow Thruster indicator.

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- e) 4.1.5 Paper charts were declared as the primary means of navigation, however, it was incorrectly stated as ECDIS.
- f) 5.3.1 The foam was renewed in Feb-2023, however, it was incorrectly stated as 09-Mar-2023.
- g) 5.3.8.1 The vessel was not fitted with a dedicated rescue boat, however, it was incorrectly stated as yes.
- h) 6.1.1.3 & 6.1.1.4 -The specific heights in question for the continuous deck fish plate were not provided.
- i) 7.1.1 The cargo tank information was not included.
- j) 7.1.3 The ballast tank coating inspection date was incorrectly stated as overdue on 10-Nov-2022.
- k) 7.1.6 A manual PMS system was used onboard, however, it was incorrectly stated as computerized.
- l) 8.1.1 The ballast tank identities differ from that listed under 7.1.3.
- m) 8.2.3.1 The vessel complied with both D1 & D2 methods, however, D1 was not included.
- n) 8.4.1 The bunker handling information for Oil was not included.
- o) 9.1.1 The tank plan for cargo handling was not provided.
- p) 9.6.2 The cargo pump data was not provided.
- q) 9.6.5 The cargo pump emergency stop location was not specified.
- r) 9.7.7 Adjustable cargo temperature alarms were fitted, however, it was not specified.
- s) 9.7.9 Adjustable cargo level alarms were fitted, however, it was not specified.
- t) 9.8.5 The name of the cargo inspection company conducting the calibration was not specified.
- u) 9.8.9.2 The high level alarms were stated as not fitted to all cargo tanks.
- v) 9.8.13.2 & 9.8.13.3 The details of the portable gauging equipment were not included.
- w) 9.8.23 No portable equipment was provided for checking the oil/water interface, however, it was incorrectly stated as MMC tape.
- x) 9.14.4 The vessel was not fitted with a fixed gas detection system, however, the responsible person for testing the same was stated as C/O.
- y) 9.17.1 The cargo pump information was not included.
- z) 10.1.2.3 The SDMBL was not specified.
- aa) 10.1.3 The diagram for the mooring winch layout was not included.
- bb) 10.1.4 The details of the winches and brake testing including rendering loads were not provided.
- cc) 10.1.7 The details for the mooring ropes, wires, tails and shackles were not included.
- dd) 10.2 The information on the mooring bollards/bitts and fairleads was not provided.

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- ee) 10.9.1 The details of the lifting equipment were not provided.
- ff) 10.10.6 The vessel was provided with portable gangways, however, it was not included.
- gg) 11.1.4.2 The rated output of the boiler was not provided.
- hh) 11.1.6 The fuel for the main propulsion was stated as HFO instead of LSFO & MGO.
- ii) 11.3.1 The information for the power generators was not provided.
- jj) 11.3.4 The primary and secondary sources of starting the emergency generator were not specified.
- kk) 11.5.1 The bunker tank capacities were not specified.
- II) 11.7.4 The vessel was not fitted with an emergency rudder arrest/rudder control, however, it was stated as yes.
- mm) 11.8.2 The number of engine bilge alarms was not specified.
- nn) 11.8.4 The number of pump room bilge alarms was not specified.
- oo) 12.2 The hose handling crane information was not included.
- pp) 12.3 The vessel was provided with cargo hoses, however, it was not included.

1.15	Vessel's operation at the time of the inspection:	Discharging
1.16	Product(s) being handled:	Dirty petroleum products (high flashpoint)
1.17	Vessel type:	Bitumen Tanker
1.18	Hull type:	Other
	Other Inspector Comments: The ship was required to be constructed acceptation 19.6.	cording to, and complies with the requirements of
1.19	Name of the vessel's operator:	May Maritime Services Sdn Bhd
1.20	Date the current operator assumed responsibility for the vessel:	21 Dec 2017
1.21	Date of the last port State control inspection:	01 Nov 2023
1.22	Port of the last Port State Control inspection:	Sampit, Indonesia
	Other Inspector Comments: There was no deficiency noted.	
1.23	Name of Classification society:	Registro Italiano Navale
1.24	Date of expiry of the Class Certificate:	26 Jan 2028

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Report for PUSAKA PRIMA [HCCJ-3047-7117-7081, Date: 20 Feb 2024]

1.25	Date of departure from the last class-credited drydock/repair period or in water survey	12 Mar 2023
1.26	Does the vessel have a recent class Survey Status Report and are past Class Survey Records complete:	Yes

Additional Comments

1.99 Additional Comments

The DPA and Marine Superintendent were present onboard to oversee the inspection.

Chapter 2: Certification and Documentation

Certification

2.1.9	What is the vessel's designation as recorded in the IOPP Certificate, Form B, Question 1.11?	7 Oil tanker dedicated to the carriage of products referred to in regulation 2.4
2.2	Is the vessel's P and I Club a member of the International Group?	Yes

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Crew details on 20 Feb 2024

Officer Crew

										Years	in servic	e			
Rank	Watch keeper on this ship?			Issuing country	Admin. accept		Specialised Tanker Training	Radio qual.	-	Rank	Tanker type	All type:			English prof.
Master	No	Indonesian	Master II/2	Indonesia	Yes	Oil and Chemic	Advanced	Yes	3.0	9.1	9.1	9.1	5.1	0.97	Good
Chief Mate	Yes	Indonesian	Master II/2	Indonesia	Yes	Oil and Chemic al	Advanced	Yes	3.8	3.4	7.7	7.7	7.7	0.67	Good
2nd Officer	Yes	Indonesian	OOW (Deck) II/1	Indonesia	Yes	Oil	Advanced	Yes	3.7	3.7	3.7	3.7	3.7	2.40	Good
3rd Officer	Yes	Indonesian	Chief Mate II/2	Indonesia	Yes	Oil and Chemic al	Advanced	Yes	2.7	1.8	1.8	2.7	2.7	4.23	Good
Engineer Crew															
Eligilie	ci cic	. • •													
									_		in servic				
Rank		Nationality r		Issuing country	Admin. accept		Specialised Tanker Training	Radio qual.	Oper- ator						English prof.
	Watch keeper on this ship?	Nationality r	Comp.	•	accept	cert.	Tanker Training				Tanker	All		tour	Ū
Rank Chief	Watch keeper on this ship? No er	Nationality r	Chief Eng III/2	country	Yes	Oil and Chemic	Tanker Training Advanced	qual.	ator	Rank	Tanker type	All types	S	0.23	prof.
Rank Chief Enginee	Watch keeper on this ship? No er Yes	Nationality 5 Indonesian	Chief Eng III/2 Second Eng III/2	country	Yes	Oil and Chemic al Oil and Chemic	Tanker Training Advanced	qual.	ator 6.5	Rank 8.2	Tanker type 6.5	All types	8.2	0.23 3.40	prof.

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Section 2

Key questions marked Yes without comment.

Chapter 2: Certification and Documentation

Safety Management and the Operators Procedures Manuals

2.3, 2.5, 2.6

Anti Pollution

2.10, 2.14

Structure

2.15

Chapter 3: Crew Management

Crew Management

3.2, 3.4

Crew Qualifications

3.5, 3.6

Chapter 4: Navigation and Communications

Policies, Procedures and Documentation

4.1, 4.2, 4.3, 4.6

Navigation Equipment

4.7, 4.9, 4.10, 4.11, 4.12, 4.13, 4.15, 4.17, 4.18, 4.20

Communications

4.21, 4.22, 4.25, 4.26, 4.27

Chapter 5: Safety Management

Safety Management

5.1, 5.2, 5.4, 5.5, 5.6, 5.9, 5.10, 5.11

Drills, Training and Familiarisation

5.12, 5.13, 5.14, 5.15

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Enclosed Space and Pump Room Entry Procedures:
5.16, 5.17, 5.18, 5.20
Monitoring Non-Cargo Spaces:
5.21
Gas Analysing Equipment
5.23
Hot Work Procedures
5.24, 5.25, 5.26
Life Saving Equipment
5.27, 5.28, 5.30, 5.31
Fire Fighting Equipment
5.34, 5.35, 5.37, 5.40, 5.42, 5.44
Material Safety Data Sheets (MSDS)
5.46
Sample Arrangements
5.48
Chapter 6: Pollution Prevention
Pollution Prevention
6.1, 6.2
Cargo Operations and Deck Area Pollution Prevention
6.6, 6.8, 6.9
Pump Rooms and Oil Discharge Monitors
6.12
Engine and Steering Compartments
6.15, 6.16, 6.18, 6.20
Ballast Water Management
6.21, 6.22

Policies and Procedures

7.1, 7.2, 7.3, 7.4, 7.7, 7.8, 7.9, 7.10, 7.12, 7.13

Cyber Security

7.14, 7.15, 7.16, 7.17

Chapter 8: Cargo and Ballast Systems - Petroleum

Policies, Procedures and Documentation

8.1, 8.2

Cargo Operations and Related Safety Management

8.7, 8.10, 8.11

Ullaging, Sampling and Closed Operations

8.16, 8.18

Manifold Arrangements

8.43

Pump Rooms

8.44, 8.45, 8.48

Cargo Hoses

8.49

Cargo Lifting Equipment

8.50

Ship to Ship Transfer Operations

8.51, 8.53, 8.54

Chapter 9: Mooring

Mooring Equipment Documentation and Management

9.1, 9.2, 9.3, 9.4, 9.5

Mooring procedures

9.9, 9.10, 9.13

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Mooring equipment

9.14, 9.15, 9.17, 9.18, 9.19

Anchoring equipment

9.20, 9.21, 9.22, 9.23, 9.24

Emergency Towing Arrangements

9.29

Chapter 10: Engine and Steering Compartments

Policies, Procedures and Documentation

10.1, 10.3, 10.5, 10.6, 10.8, 10.9, 10.10

Planned Maintenance

10.12, 10.13

Safety Management

10.15, 10.16

Fire Fighting Equipment

10.18, 10.20, 10.24, 10.25, 10.27, 10.28, 10.29

Machinery Status

10.33, 10.35, 10.37

Steering Compartment

10.41, 10.42, 10.43

Chapter 11: General Appearance and Condition

Hull, superstructure and external weather decks

11.1, 11.2, 11.3, 11.4, 11.5, 11.6, 11.7, 11.8

Electrical Equipment

11.10, 11.11

Internal Spaces

11.12

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Accomodation Areas

11.13, 11.14, 11.16

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Section 3

Chapter 2: Certification and Documentation

Certification

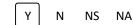
Are all the statutory certificates listed below, where applicable, valid and have the annual and intermediate surveys been carried out within the required range dates?

Y N NS NA

Other Inspector Comments: The DOC was issued by the Marine Department Malaysia whilst the SMC, MLC & ISSC were issued by class RINA.

Safety Management and the Operators Procedures Manuals

2.4 Does the Operator's representative visit the vessel at least bi-annually?



Other Inspector Comments: The last Technical Superintendent attendance was on 07-Oct-2023.

The Marine Superintendent was present during the inspection and was present onboard previously on 27-Dec-2023.

Survey and Repair History

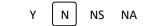
2.7 Is the vessel free of conditions of class or significant recommendations, memoranda or notations?



NA

Other Inspector Comments: As per the latest class Survey Status Report dated 19-Feb-2024, no issues of concern were highlighted.

2.8 Has the vessel been enrolled in a Classification Society Condition Assessment programme (CAP)?



Inspector Observations: The vessel was built in 1996 and there was no evidence of the vessel being enrolled in CAP.

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Initial Operator Comments: Define the Situation:

Condition Assessment Programme (CAP) is a voluntary program to document the quality of a vessel beyond the normal scope of Classification Societies, applicable to oil tankers and bulk carriers of 15 years of age and above. The company acknowledged that the vessel was 28 years old, and this voluntary program (CAP) was not carried out for the vessel, however, the vessel condition was well maintained as per class regulations.

Fix or Quick Fix:

The vessel is RINA Class and is below 10K DWT which followed strictly the RINA Class regulation and requirements to maintain the vessel condition:

- 1. RINA Class Condition Survey Report of Ballast Tank and Void Spaces on 12 March 2023 to examine the internal structure condition and Coating Condition, all found in good condition. (As the attached report, Dated 12 Mar 2023)
- 2. Latest Ultrasonic Thickness Measurement report conducted by a class-approved company found all structural conditions are in order. (As attached UTM report dated 06 Feb 2023 14 Feb 2023)
- 3. Referring to the attached vessel Class Survey Status, the vessel's Class Survey, Statutory Survey, and machinery Continuous Survey, all are valid. (As attached CSSR report Dated 11 Mar 2024)
- 4. Ship hull Coating and condition maintain every docking (As attached last report from Paint Maker, dated 19 Feb 2023).
- 5. Insulation Resistance Test for all electrical machinery conducted on a six-monthly basis and all are in order (As attached report dated24 Dec 2023)
- 6. Lub Oil Analysis is being taken regularly as per company policy, (as an attached status report 28 Feb 2024)
- 7. Vessel maintaining regular inspection for cargo tank, ballast tank void space, FW tank, and cofferdam as per the company procedure and policy (as an attached status report Dated 28 February 2024)

Identified Root Causes:

Lack of Compliance with the voluntary requirement

Long-Term Corrective Action:

- 1. Continuous monitoring of vessel tank and structure condition.
- 2. The vessel's last tank condition survey by class was satisfactory.
- 3. The company will consider enrolling in the voluntary condition assessment program in the future and when there is a requirement.

Attachments:

- 1. RINA Class Condition Survey Report of Ballast Tanks and Void Spaces On 12 Mar 2023.
- 2. Latest Ultrasonic Thickness Measurement Report Dated 06 Feb 2023 14 Feb 2023
- 3. Latest Class Survey Status Report on 11 Mar 2024
- 4. Hull Coating Report from Paint Maker "International Paint" Dated 19 Feb 2023
- 5. Resistance Test for all electrical machinery conducted on 24 Dec 2023 (6 Monthly)
- 6. Lub Oil Analysis Status Report On 28 Feb 2024
- 7. Onboard Regular Tank Inspection Status, Report dated 28 Feb 2024

Attachment: Obs No.1 VIQ 2.8 PUSAKA PRIMA - RINA Class Condition Survey of Ballast Tanks On 12 Mar 2023.pdf

Attachment: Obs No.1 VIQ 2.8 PUSAKA PRIMA - Final Report UTM PUSAKA PRIMA...pdf

Attachment: Obs No.1 VIQ 2.8 PUSAKA PRIMA - Class Survey Status on 11 Mar 2024.pdf

Attachment: Obs No.1 VIQ 2.8 PUSAKA PRIMA - IP COATING REPORT On 19 Feb 2023...pdf

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Attachment: Obs No.1 VIQ 2.8 PUSAKA PRIMA - Magger Test Report On 24 December 2023.pdf Attachment: Obs No.1 VIQ 2.8 PUSAKA PRIMA - Lub Oil Analysis Status 28 Feb 2024.pdf Attachment: Obs No.1 VIQ 2.8 PUSAKA PRIMA - Tanks Inspection Status Feb 2024..pdf 2.9 Are procedures in place to carry out regular inspections of cargo and ballast tanks, void spaces, NA trunks and cofferdams by the vessel's personnel and are records maintained? Other Inspector Comments: As per the company policy, the tank inspection frequency for Cargo Tanks and Ballast Tanks and Void Spaces were as follows: - Cargo Tanks at 30 month intervals and were last inspected on 17-Feb-2023 during docking. - Ballast Tanks at 12 month intervals and were last inspected from 30-Jan-2024 till 01-Feb-2024. - Void Spaces at 03 month intervals and were last inspected on 08-Feb-2024. Anti Pollution 2.11 If the disposal of engine room oily water or sludge to a cargo or slop tank has taken place, has the event been recorded in both Oil Record Books, was the receiving tank free of cargo and have the transfer arrangements been approved as per IOPP Form B? 2.12 Is the vessel in possession of an approved Volatile Organic Compounds (VOC) Management Plan and the deck officers aware of the general contents and requirements of the plan? 2.13 Is the vessel provided with an approved Ballast Water and Sediments Management Plan, are NS NA records maintained of all ballast water exchanges or treatment operations and are the officers aware of BWM requirements? Other Inspector Comments: The vessel was certified under both Reg D1 (ballast water exchange using flow through method) and Reg D2 (ballast water treatment plant using uv treatment and filtering method). As per the Ballast Log, the treatment plant was used onboard.

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Structure

2.16 If any cargo / ballast tanks, void or hold spaces were sighted from the deck, were they in good order, free from oil contamination and could the vessel easily check or sample segregated ballast prior to deballasting?

Y N NS NA

Other Inspector Comments: The Fore Peak Tank was sighted from top through the manhole. The coating condition was fair. No sheen or foul smell was noted.

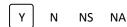
Additional Comments

2.99 Additional Comments

Chapter 3: Crew Management

Crew Management

3.1 Does the manning level meet or exceed that required by the Minimum Safe Manning Document?



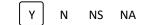
Other Inspector Comments: As per Vessel "Safe Manning Requirement" only 11 staff were required on-board as hereunder:

1 Master, 1 Chief Officer, 2 Navigation Watch Keeping Officer, 1 Chief Engineer, 1 2nd Engineer, 1 Engine Watch Keeping Officer, 2 Navigation Watch Keeping ratings and 2 Engine Watch Keeping ratings.

The actual complement of the vessel comprised 17 ship staff. As per actual manning, the following staff was on board:

1 Master, 1 Chief Officer, 2 Navigation Watch Keeping Officers, 1 Chief Engineer, 1 2nd Engineer, 2 Engine Watch Keeping Officers, 3 Navigation Watch Keeping ratings, 1 Deck Rating, 2 Engine Watch Keeping ratings, 1 Deck Cadet, 1 Engine Cadet and 1 Chief Cook.

3.3 Are all personnel able to communicate effectively in a common language?



Other Inspector Comments: The common working language was English. The vessel was manned by Indonesians along with one Malaysian Engine Cadet.

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Crew Qualifications

3.7 If the vessel is equipped with an Electronic Chart Display and Information System (ECDIS) have the Master and deck officers undertaken both, generic training and type-specific familiarisation on the system fitted onboard?

Y N NS NA

Other Inspector Comments: All navigating officers had attended the generic ECDIS course. The type specific familiarization for all was done via computer based training onboard.

Drug and Alcohol Policy

3.8 Does the operator have measures in place to prevent Drug and Alcohol abuse in accordance with OCIMF guidance?

Y N NS NA

Inspector Observations: The annual external D&A test was carried out once per year, however, it does not include the entire vessel complement but was limited to a minimum of 4 persons inclusive of one senior officer, one junior officer, one deck rating and one engine rating. It was not evident that a junior officer was tested for the annual test conducted on 08-Jan-2024 since only the Master, 2/E, Bosun, 1 AB & 1 Oiler were tested.

Other Inspector Comments: The monthly onboard random alcohol test was last dated 05-Feb-2024.

The company initiated 2 monthly alcohol tests last dated 19-Feb-2024.

The unannounced D&A test by an external agency was last dated 08-Jan-2024.

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Initial Operator Comments: Define the Situation:

The company has a strict policy against using drugs and alcohol on board the ship. The captain is in charge of enforcing this policy. According to the company rules, unannounced drug and alcohol tests are conducted once a year by an independent agency. These tests involve at least four crew members, including a senior officer, a junior officer, and one crew member from both the deck and engine departments. This test does not include the entire vessel complement. The latest test was done on January 8, 2024, but only the Master, Second Engineer, Bosun, 1AB, and 1 Oiler were tested; the junior officer was not included.

Fix or Quick Fix:

The company strictly enforces a "Zero Tolerance Policy" regarding drug and alcohol control aboard, following OCIMF guidelines outlined in the control of drug and alcohol onboard ship, June 1995. To ensure compliance, the company conducts various drug and alcohol tests as per Company Procedure SMS Chapter 11.11:

- 1. Pre-Joining Drug and Alcohol Test: Individuals are issued a certificate valid for one year upon passing.
- 2. Monthly Onboard Alcohol Test: Administered by the vessel's Master or authorized personnel, last conducted on 05 Feb 2024.
- 3. Unannounced Random Alcohol Tests: Conducted by the Company every two months for the master, ship's officers, and ratings, with detailed records maintained for alcohol beverage control. Last conducted on 19 Feb 2024.
- 4. Unannounced Drug and Alcohol Testing: Carried out by an independent agency for at least four seafarers, last performed on 08 Jan 2024.
- 5. Post-Incident Alcohol and Drug Tests: Conducted by the master for all personnel on duty or involved, including himself.

The duration of onboard contracts varies 4 months for senior officers, 6 months for junior officers, and 9 months for deck and engine ratings. Considering the current procedures and contract durations, these measures effectively control and prevent drug and alcohol abuse onboard.

Identified Root Causes:

Lack of monitoring and implementation of the procedure

Long-Term Corrective Action:

The existing measures and procedures effectively address and discourage drug and alcohol abuse onboard. However, the operator is exploring the possibility of expanding unannounced random drug and alcohol testing to include all crew members for a more thorough screening process.

Unannounced Alcohol Testing: Administered by an independent agency, this testing will be conducted twice a year, with 50% of the total complement tested during each session to cover the entire crew within a year.

The company is currently reviewing and revising its policies and procedures to underscore the significance of comprehensive drug and alcohol testing in promoting a safe and secure working environment.

Attachments:

Unannounced Drug and Alcohol Test Report 08 Jan 2024

Attachment: Obs No.2 VIQ 3.8 Unannounced Drug and Alcohol Test Report 08 Jan 2024.pdf

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Additional Comments 3.99 **Additional Comments Chapter 4: Navigation and Communications** Policies, Procedures and Documentation 4.4 Are fire and safety rounds being completed after each watch, recorded in the deck log and are NS NA the staff conducting the rounds aware of their duties here? Other Inspector Comments: The fire rounds at sea were carried out by both the outgoing officer and lookout. 4.5 Are the deck officers' familiar with the operators Under Keel Clearance policy, able to Υ NS NA demonstrate satisfactory UKC calculations for the last voyage and is the policy comprehensive? Other Inspector Comments: The UKC policy for the company was as follows: 1. Ocean Passage - 20% of the maximum draft or 3.0 metre whichever the higher. 2. On Fairway Passage outside port limit - 15% of the maximum draft or 1.0 metre whichever the higher. 3. On Fairway Passage inside port limit - 10% of the maximum draft or 0.5 metre whichever the higher. 4. Alongside Berth - 10% of the maximum draft or 0.5 metre whichever the higher. **Navigation Equipment** 4.8 Are navigation lights in good order, the OOW aware of the procedures for testing the lights and NS NA actions in event of failure? Other Inspector Comments: Random testing of the forward and main masthead lights failure alarms on both the primary and secondary systems was performed by the 2/O. 4.14 Are Master and deck officer's familiar with the operation of the ECDIS system fitted on board? NS NA Other Inspector Comments: The vessel was installed with 1 approved type ECDIS. The Records of Safety Equipment included ECDIS as fitted and backup for ECDIS was nautical charts. The paper charts were being used as the primary means of navigation whilst the ECDIS was the backup system.

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4.16 Were the charts used for the previous voyage appropriate?

NS NA

Inspector Observations: Randomly checked the paper charts used for the voyage and noted an obsolete chart (BA 2153 - Port Klang approaches) was used to plot positions and also listed on the passage plan.

Initial Operator Comments: Define the Situation:

The last voyage preceding the inspection involved the vessel sailing from Singapore to Port Klang. ECDIS is used as the primary means for navigation, and the paper charts as a backup. All ECDIS charts, BA Charts, and publications were updated to NTM 07/2024. However, it was discovered during the inspection that one of the paper charts, specifically BA 2153 – Port Klang Approaches, was an obsolete chart. this chart was still used to plot the vessel's position and was included in the passage plan.

Fix or Quick Fix:

The paper chart BA 2153 has been promptly taken out of service and clearly labeled as an "obsolete chart" to prevent any future use in navigation. The Master thoroughly audited all charts and publications onboard to identify any other outdated materials. Every BA Chart onboard has been inspected against the Cumulative List of Admiralty Notices to Mariners Weekly Edition 09, dated 29 February 2024, ensuring they are in the latest edition and fully

Please refer to the attached List of Admiralty Notices to Mariners Weekly Edition 09 and Chart inventory.

Identified Root Causes:

Lack of monitoring of the Charts on board.

Long-Term Corrective Action:

- Implement a structured chart management system to track the status of all charts and publications onboard, including their update status and expiry dates.
- Establish procedures for regularly monitoring and updating charts and publications, The charts inventory will be checked regularly and sent to the marine department monthly.
- Conduct periodic reviews and audits of the chart management system to ensure its effectiveness and compliance with industry standards and regulations.
- The ECDIS as a primary means of navigation onboard is regularly updated to the latest Information and NTM.
- Those outdated/obsolete paper charts are taken out of service, kept in separate storage, and clearly labeled as an "obsolete chart" to prevent any future use in navigation.

Attachments:

- 1. List of Admiralty Notice to Mariners Weekly Edition 09, Dated 29 Feb 2024.
- 2. **BA Chart Inventory**
- 3. Photo of Obsolete Charts

Attachment: Obs No.3 VIQ 4.16 NP234 - Comulative List of NTM Wk 09-24.pdf

Attachment: Obs No.3 VIQ 4.16 PUSAKA PRIMA-List of Onboard Nautical Chart - Feb 2024.pdf

Attachment: Obs No.3 VIQ 4.16 Photo of Obselete Charts.pdf

4.19 Is the master and deck officers aware of the requirements for the echo sounder and is there evidence that it has been in use as appropriate during the voyage?

NS NA

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	Other Inspector Comments: The echo sounder equipment included a graphical printer without any alarm facility.				
Commur	nications				
4.23	Are the officers aware of the periodical test requirements for GMDSS equipment and is the radio logbook correctly maintained with entries of such tests? Other Inspector Comments: The last MF/HF DSC was performed with coast station Wiluna on 13-Feb-2024.	Υ	N	NS	NA
4.24	Is there a maintenance programme in place to ensure availability of the radio equipment? Other Inspector Comments: The shore based maintenance agreement was noted in date with Fong Huang Electronics Pte Ltd.	Υ	N	NS	NA
Addition	al Comments				
4.99	Additional Comments				

Chapter 5: Safety Management

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Safety Management 5.3 Is the appointed Safety Officer suitably trained, aware of his responsibilities and is there NS NA evidence to show that the safety officer has been effectively performing duties associated with Other Inspector Comments: The C/O was the appointed Safety Officer onboard and his training certificate was sighted in order. Are crew members participating in safety meetings and is there evidence of effective 5.7 Υ NS NA discussions on safety related issues with shore management feedback? Other Inspector Comments: The last safety meeting was carried out on 30-Jan-2024 with office akcnowledgement dated 02-Feb-2024. 5.8 Are the crew aware of the requirements for reporting of accidents, incidents, non-conformities Υ Ν NS NA and near misses and is there an effective system of reporting and follow up investigation in place? Other Inspector Comments: 04 near miss reports raised per month in compliance with the company requirement. For Jan-2024, the near misses were reported by the Bosun, C/E, C/O and 3/0. Enclosed Space and Pump Room Entry Procedures: 5.19 Are the officers aware of the correct settings of pump room fire and flooding dampers and are NS NA the dampers clearly marked and in good order? Other Inspector Comments: The starboard side flooding damper was tested in order by the Bosun. Monitoring Non-Cargo Spaces: Where a fixed system to monitor flammable atmospheres in non-cargo spaces is fitted, are 5.22 recorders and alarms in order? Other Inspector Comments: Only manual checks were carried out onboard due to the vessel not being fitted with any fixed gas detection system.

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Life Saving Equipment									
5.29	Are lifeboats, including their equipment and launching mechanisms, in good order and have they been launched and manoeuvred in the water in accordance with SOLAS requirements? Other Inspector Comments: The starboard side lifeboat engine, lighting and emergency rudder engagement were tested by the 3/O.	Υ	N	NS	NA				
5.32	Are lifejackets in good order and correctly located? Other Inspector Comments: Randomly tested the lifejacket light provided in the Forward Store.	Υ	N	NS	NA				
5.33	Are immersion suits in a good order, correctly positioned and officers aware of maintenance and carriage requirements? Other Inspector Comments: Randomly checked one immersion suit light located in the Forward Store.	Υ	N	NS	NA				

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Fire Figh	iting Equipment				
5.36	Are records available to show that samples of foam compound have been tested at regular intervals? Other Inspector Comments: The low expansion foam was renewed in Feb-2023.	Y	N	NS	NA
5.38	Are fire mains, pumps, hoses, nozzles and isolating valves in good order, available for immediate use and clearly marked? Other Inspector Comments: Two fire hoses were tested during the inspection, with one located on the Bridge and the other on the forward deck.	Υ	N	NS	NA
5.39	Are officers aware of the requirements for testing fixed fire detection and alarm systems and are the systems in good order and tested regularly? Other Inspector Comments: The heat detector located within the ECR was tested in order. The vessel was provided with heat and smoke detectors along with an approved test kit.	Y	N	NS	NA
5.41	Is the emergency fire pump in full operational condition, starting instructions clearly displayed and are officers able to operate the pump? Other Inspector Comments: The crank start emergency fire pump was started by the 4/E during the steering gear room rounds.	Υ	N	NS	NA
5.43	Are crew members familiar with donning breathing apparatus and are Fireman's Outfits in good order and ready for immediate use? Other Inspector Comments: The breathing apparatus located within the accommodation was randomly tested in order for the low pressure alarm.	Υ	N	NS	NA
5.45	Are fire flaps clearly marked to indicate the spaces they serve and is there evidence of regular testing and maintenance? Other Inspector Comments: The starboard side manual operated funnel fire flap was tested in order.	Υ	N	NS	NA

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Access

5.47 Is the vessel provided with a safe means of access and are all available means of access (gangway / accommodation ladder / pilot ladder / transfer basket) in good order and well maintained?

Y N NS NA

Other Inspector Comments: The vessel's portable gangway was used for boarding the vessel. A safety net was rigged in place.

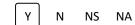
Additional Comments

5.99 Additional Comments

Chapter 6: Pollution Prevention

Pollution Prevention

6.3 Are means readily available for dealing with small oil or chemical spills?



Other Inspector Comments: The common wilden pump operation was tested in order.

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Cargo Op	perations and Deck Area Pollution Prevention				
6.4	Are Annex 1 and 2 overboard valves and cargo system sea valves suitably secured, thoroughly checked closed prior to commencement of cargo transfer and where provided, sea valvetesting arrangements in order and regularly monitored for leakage?	Y	N	NS	NA
6.5	If ballast lines pass through cargo and/or Bunker tanks are they tested regularly, and the results recorded?	Υ	N	NS	NA
6.7	Have bunker pipelines been satisfactorily tested on an annual basis and is there suitable evidence of this test? Other Inspector Comments: The bunker pipelines were pressure tested to 100% MAWP of 4.0 bars on 01-Oct-2023 and to 150% MAWP of 6.0 bars on 15-Feb-2023 during the last docking.	Υ	N	NS	NA
6.10	Are the arrangements for the disposal of oily water in the forecastle and other internal spaces adequate and are officers aware of these requirements? Other Inspector Comments: The forward store common bilge alarm was tested in order.	Υ	N	NS	NA
Pump Ro	ooms and Oil Discharge Monitors				
6.11	Are pump room / trunk space bilge high level alarms fitted, regularly tested and the results recorded? Other Inspector Comments: The pump room starboard side bilge alarm was tested in order by the Bosun.	Υ	N	NS	NA
6.13	If an ODME is fitted, is it in good order, well maintained and any operational downtime recorded in the ORB? Other Inspector Comments: The ship was exempted from the requirements of MARPOL Regulations 29, 31 & 32 in accordance with Regulation 2.4.	Y	N	NS	NA

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Engine a	and Steering Compartments				
6.14	Are the engine room bilge oily water pumping and disposal arrangements in good order?	Υ	N	NS	NA
	Other Inspector Comments: The Fire/GS pump and Bilge pump were directly connected to the main bilge system.				
6.17	Is the oily water separator in good order, free from unauthorised modifications and are the engineers well familiar with its operation and data recovery procedure where applicable? Other Inspector Comments: The OWS 15 ppm alarm and 3 way valve operation were tested in order by the 2/E.	Υ	N	NS	NA
6.19	If the oily water separator is not fitted with an automatic stopping device, do entries in the Oil Record Book Part 1 indicate that it has not been used in a Special Area?	Υ	N	NS	NA
Addition	nal Comments				
6.99	Additional Comments				

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Chapter 7: Maritime Security

Policies and Procedures

7.5 Has the ship's security officer been trained to undertake this role and do they understand their responsibilities?

NS

Other Inspector Comments: The Master was the appointed Security Officer onboard and his training certificate was sighted in order.

7.6 If fitted, is the vessel's dedicated standalone security communications equipment regularly tested?

NS

NA

7.11 Does the Master/SSO have a clear understanding of the procedures for voluntary security reporting?

Υ

NS NA

Other Inspector Comments: The vessel participated in IFC voluntary security reporting during her present voyage.

Additional Comments

7.99 **Additional Comments**

Chapter 8: Cargo and Ballast Systems - Petroleum

Policies, Procedures and Documentation

8.3 Are cargo pump performance curves available, are deck officers aware of the test requirements for the cargo lines, vapour lines and inert gas lines in good order and is there recorded evidence of regular testing where applicable?



NS NA

Other Inspector Comments: The cargo pipelines were pressure tested to 100% MAWP of 8.0 bars on 30-Sep-2023 and to 150% MAWP of 12.0 bars on 15-Feb-2023 during the last docking.

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Stability	and Cargo Loading Limitations				
8.4	If a loading computer or programme is in use, is it class approved, regularly tested and are officers aware of the test requirements including damage stability? Other Inspector Comments: The loading computer was fitted with "CyberMaster" stability software and tested at quarterly intervals. The last annual class verification was dated 27-Dec-2023.	Y	N	NS	NA
8.5	Has a cargo plan been prepared and followed with a detailed sequence of cargo and ballast transfers documented, stress, intact and damage stability and are any limitations, where applicable understood by the cargo watch officers and clearly documented? Other Inspector Comments: The vessel planned to offload the entire cargo onboard during her current operation.	Υ	N	NS	NA
8.6	Is the vessel free of inherent intact stability problems, are officer's aware of these problems or risks of structural damage due to sloshing, and actions required if the vessel takes on an unstable condition and/or an angle of loll. Other Inspector Comments: The intact stability booklet does not identify any stability restrictions.	Υ	N	NS	NA
Cargo O _l	perations and Related Safety Management				
8.8	Are the cargo, ballast and stripping pumps, eductors and their associated instrumentation and controls including temperature monitoring, in good order and is there recorded evidence of regular testing? Other Inspector Comments: The No. 2 cargo pump was in use and noted with 4.5 bar pressure in the pump room bottom.	Y	N	NS	NA
8.9	Are officers aware of the column/cofferdam purging routines where deep well pumps are fitted and is the pump leakage within tolerable limits?	Υ	N	NS	NA
8.12	Are the cargo system ullage gauges, vapour locks and UTI tapes in good order and is there recorded evidence of regular testing? Other Inspector Comments: All tanks were fitted with fixed tank gauges. No UTI tapes were provided. Two sounding tapes were available onboard for manual gauging when required.	Y	N	NS	NA

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8.13 Are the remote and local temperature and pressure sensors and gauges in good order and is there recorded evidence of regular testing?

Y N NS NA

Inspector Observations: The vessel was discharging heated cargoes, however, the remote temperature alarms were set to zero instead.

Initial Operator Comments: Define the Situation:

The vessel is an asphalt carrier transporting bitumen 80/100, a heated cargo requiring a minimum temperature of 145°C as per charterer instructions. The vessel is equipped with a cargo tank radar system to monitor ullage and temperature, which includes a temperature alarm feature. However, it was observed that the low-temperature alarm function was not being utilized and was instead set to zero.

Fix or Quick Fix:

The Chief Officer thoroughly reviewed cargo temperature monitoring procedures and alarm configurations to ensure compliance with charter instructions and cargo requirements. To provide early warnings, the low-temperature alarm is set at 110°C, below the cargo's melting point range of 100°C to 150°C.

Please refer to the attached photo displaying the low-temperature alarm set at 110°C

Identified Root Causes:

Lack of monitoring

Long-Term Corrective Action:

The Chief Officer trains all duty officers extensively, focusing on cargo temperature monitoring and alarm operation to ensure everyone understands and excels in these procedures. We maintain constant surveillance of cargo temperature and keep detailed records of all temperature-related tasks.

Before starting operations, the Chief Officer confirms and reviews the alarm settings of the cargo tanks, documenting these specifics in the prior discharge operation test log, which is attached for reference.

Attachments:

- 1. Photo of Temperature alarm setting at Tank Radar
- 2. Training Report
- 3. Prior Discharge Operation Test Log
- 4. Cargo Heating Record

Attachment: Obs No.4 VIQ 8.13 Cargo Heating Record Voy 06-24.pdf

Attachment: Obs No.4 VIQ 8.13 SMS-07-08 Training Report TANK RADAR SYSTEM 21 Feb 2024.pdf

Attachment: Obs No.4 VIQ 8.13 VOY 08.D Prior Ops Test Log - Discharge Samarinda.pdf Attachment: Obs No.4 VIQ 8.13 Photo of Temp Alarm Setting in Tank Radar System.pdf

8.14 Are the cargo tank high level and overfill alarms in good order and is there recorded evidence

of regular testing?

dent

NS NA

Other Inspector Comments: The high level alarms and overfill alarm system were independent of the main gauging system. The overfill alarm was tested from the CCR for the No. 1S cargo tank during the inspection.

	Other Inspector Comments: The heating system was in use during the discharge operation.				
Ullaging,	, Sampling and Closed Operations				
8.17	Is the vessel provided with an approved vapour control system?	Y	N	NS	NA
Venting	Arrangements				
8.19	Are the officers aware of the primary and secondary cargo tank venting systems and are the systems functioning correctly? Other Inspector Comments: The Bitumin carrier was only provided with a common mast riser.	Y	N	NS	NA
8.20	If stop valves are fitted which permit isolation of individual tanks from the common venting system, are they provided with positive locking arrangements and are the keys under the control of the person in overall charge of the cargo transfer?	Y	N	NS	NA
8.21	Are the P/V valves in good order, inspected and cleaned as part of a regular planned maintenance routine and are there records to support this?	Υ	N	NS	NA
Manifolo	d Arrangements				
8.41	Are the manifolds and associated valves in good order, blank flanges of an equivalent rating to that of the pipelines and pressure gauges fitted outboard of the manifold valves on both sides and monitored for leakage? Other Inspector Comments: The port side manifold was connected to an 8 inch cargo hose and noted with 2.0 bar pressure during the inspection.	Y	N	NS	NA
8.42	If the vessel is fitted with vapour return manifolds, are they in good order including those for SBM use as appropriate?	Υ	N	NS	NA

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Pump Ro	ooms				
8.46	Is the pump room gas monitoring system in good order, regularly checked and are officers aware of the alarm settings? Other Inspector Comments: The vessel was built in 1996.	Υ	N	NS	NA
8.47	Is the bilge pump in good order and can it be operated from a position outside the pump room?	Y	N	NS	NA
Ship to S	hip Transfer Operations				
8.52	Does the POAC have the necessary qualifications and experience and are officers aware of these requirements?	Y	N	NS	NA
8.55	If a ship-to-ship transfer was in progress during the inspection, was it conducted in accordance with the recommendations of the OCIMF/ICS STS Transfer Guide? Other Inspector Comments: No sts operation was carried out in the last 12 months.	Y	N	NS	NA
Addition	al Comments				
8.199	Additional Comments				
Chapte	r 9: Mooring				
Mooring	Equipment Documentation and Management				
9.6	If one or more bow stoppers are fitted, is a certificate attesting to the safe working load provided?	Υ	N	NS	NA
9.7	Is there a policy in place for the testing of winch brakes and are the results recorded?	Υ	N	NS	NA

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Mooring	procedures				
9.8	Are moorings satisfactorily deployed and tended?	Υ	N	NS	NA
	Other Inspector Comments: The vessel was made fast port side to the Terminal with a mooring pattern consisting of 3 x 2 forward and aft.				
9.11	On split drum winches are all the lines made fast with no more than one layer on each tension side of the drum?	Y	N	NS	NA
9.12	If mooring tails are fitted to wires or HMSF lines, do they have proper connections and are they correctly fitted?	Υ	N	NS	NA
Mooring	g equipment				
9.16	If mooring winches in a gas hazardous area are electrically powered, are motors Ex 'd' rated and have insulation tests been carried out and the results recorded.	Υ	N	NS	NA
Single Po	pint Moorings				
9.25	Is single point mooring (SPM) and associated equipment fitted to OCIMF recommendations?	Υ	N	NS	NA
9.26	If the vessel is equipped for mooring at single point moorings, does it meet the recommendations as applicable, contained in Mooring Equipment Guidelines?	Υ	N	NS	NA
9.27	If the vessel is fitted with a hydraulically operated bow stopper, are safeguards provided to prevent its accidental release?	Y	N	NS	NA

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Emergency Towing Arrangements

9.28 Are emergency towing arrangements readily available for deployment at both ends of the

Y N



Additional Comments

9.99 Additional Comments

Chapter 10: Engine and Steering Compartments

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Policies, Procedures and Documentation 10.2 If the machinery space is certified for unmanned operation is it being safely operated in that mode without regular alarms occurring under normal conditions? Other Inspector Comments: The vessel was manned continuously as per the safe manning document. 10.4 Are the engineers familiar with safe entry requirements to the machinery space when NS operating in the UMS mode, especially with regards to use of the dead man alarm where fitted? 10.7 Does the operator subscribe to a fuel, lube and hydraulic oil testing programme on a frequency Υ NS NA in accordance with the manufacturers recommendations and are there procedures to act on these results? Other Inspector Comments: The company had a contract with a shore firm (SGS) for the lube & hydraulic oil analysis. PMS requirement for the main engine, steering gear and generator was 6 monthly whilst for the EDG, emergency fire pump engine, windlass, cranes, winches and thermal oil system were 12 monthly. All the reports were normal as noted for the 6 monthly analysis dated 17-Oct-2023 and 12 monthly analysis dated 31-May-2023. The fuel oil analysis was conducted with Viswalab after each bunkering operation and the latest report was noted normal. 10.11 If the vessel is fitted with a class approved Exhaust Gas Cleaning System are the officers well NS familiar with the system and safety requirements and are these documented?

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Safety Ma	anagement				
.0.14	Is an engineer's call alarm fitted and is it in good order and tested regularly and the results recorded?	Υ	N	NS	NA
.0.17	Are engineers aware of the operation of the machinery space liquid fuel system remote closing valves, and are the closing devices regularly tested and in good order? Other Inspector Comments: The EDG quick closing valve was tested in order.	Υ	N	NS	NA
Fire Fight	ing Equipment				
.0.19	Are diesel engine fuel delivery pipes adequately jacketed or screened, exhaust lines and hot surfaces protected from spray and surrounding areas free from fuel or lube oil leakage? Other Inspector Comments: The main engine leak off alarm was tested in order.	Υ	N	NS	NA
.0.21	If the vessel class notation allows UMS operation, are main engine bearing temperature monitors, or the crankcase oil mist detector, in good order?	Υ	N	NS	NA
.0.22	Where hydraulic aggregate pumps are located within the main engine compartment, is an oil mist detector fitted?	Y	N	NS	NA
.0.23	Are the main switchboard, alternators and other electrical equipment satisfactorily protected from water spray? Other Inspector Comments: The main switchboard was located within the Engine Control Room (ECR).	Y	N	NS	NA
10.26	Are self-closing sounding devices to double bottom tanks in good order and closed?	Y	N	NS	NA
.0.26	Are self-closing sounding devices to double bottom tanks in good order and closed? Inspector Observations: The double bottom sounding pipe for the Bilge Separator Oil Tank was noted modified with a plastic hose connection secured at the side which was connected to the fuel oil tank pump drip tray.	Y	N		NS

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Initial Operator Comments: Define the Situation:

The Chief Engineer confirmed that modifications were made to the sounding pipe of the bilge separator oil tank, situated at the bottom of the engine room. These modifications involved attaching a plastic hose connection secured to the side, which was then connected to the drip tray of the fuel oil tank pump.

Fix or Quick Fix:

The modification pipe that was connected to the bilge separator oil tank sounding pipe has been promptly removed. We blanked it and applied a seal as a control measure. Details of the seal have been recorded in the Chief Engineer's seal tag log to prevent unauthorized connections to the blanked pipe.

Please refer to the attached photo for the condition of the sounding pipe and the Tag Log for reference.

Identified Root Causes:

Lack of control and monitoring

Long-Term Corrective Action:

To prevent unauthorized connections in the future and ensure the safety and integrity of vessel operations, the following measures have been implemented:

- 1. Seal tags have been applied to the current blanked lines, and the condition of these seal tags is monitored monthly.
- 2. Regular inspections of piping systems are conducted to detect any unauthorized modifications. Inspection results are documented in the Machinery and Engine Room Condition Checklist SOP-08.4-11.
- 3. Training and awareness among crew members have been enhanced regarding the importance of maintaining piping system integrity and the consequences of unauthorized modifications.
- 4. Penalties or disciplinary actions are enforced for individuals found responsible for unauthorized modifications.

Attachments:

- 1. Tag Log Report
- 2. Photo condition of sounding pipe Bilge Oil Tank
- 3. Machinery and Engine Room Condition Check List

Attachment: Obs No.5 VIQ 10.26 Tag Log Report.pdf

Attachment: Obs No.5 VIQ 10.26 Photo condition of sounding pipe Bilge Oil Tk.pdf

Attachment: Obs No.5 VIQ 10.26 Machinery and Engine Room Checklist February 2024.pdf

10.30 Is the bilge high level alarm system regularly tested and are records maintained?

Y N NS NA

Other Inspector Comments: The engine room common bilge alarm was tested in order.

10.31 Are seawater pumps, sea chests and associated pipework in good order and free of hard rust and temporary repairs, particularly outboard of the ship-side valves?

Y N NS NA

Other Inspector Comments: No straub coupling was sighted on the seawater pipeline onboard.

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Machine	ry Status				
10.32	Are the following, where applicable, all in good order and do they appear to be well maintained? Other Inspector Comments: The No. 1 A/E was in use during the cargo operation.	Y	N	NS	NA
10.34	Are officers fully familiar with all starting procedures for the emergency generator and are these procedures clearly and displayed? Other Inspector Comments: The EDG was provided with two batteries. The No. 1 battery was tried out by the 3/O whilst the No. 2 battery was tried out by the 4/E.	Υ	N	NS	NA
10.36	Where an emergency generator is not fitted, are engine room emergency batteries in good order and fully charged?	Y	N	NS	NA
10.38	Are switchboards free of significant earth faults? Other Inspector Comments: The vessel was fitted with 110 V & 440 V systems.	Υ	N	NS	NA
Steering	Compartment				
10.39	Are the officers aware of the test requirements for the steering gear both pre-departure and for emergency steering drills and have these tests been conducted satisfactorily with operating instructions clearly posted? Other Inspector Comments: The No. 1 steering motor failure alarm was tested in order.	Υ	N	NS	NA
10.40	Is the steering gear emergency reserve tank fully charged? Other Inspector Comments: The No. 1 steering motor hydraulic tank low level alarm was tested in order.	Υ	N	NS	NA
10.44	Are the officers and crew aware of the safe operating requirements of any watertight doors fitted?	Y	N	NS	NA

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The main deck was well coated.

The superstructure was cosmetically in satisfactory condition.

The accommodation was in a clean and hygienic condition.

Operator's initial comments entered by: Capt. Agustinus Terry Letsoin [operation@maytanker.com]

Operator's Initial General Comments

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