

November 27, 2006

Via UPS 2<sup>nd</sup> Dav Air 1Z 379 772 37 1069 6323

Mr. Ray Hellwig Regional Director Washington State Department of Ecology Northwest Regional Office 3190 160th Avenue SE Bellevue, WA 98008-5452

> Re: Washington Cruise MOU Compliance Report: 2006 Cruise Season

Dear Mr. Hellwig:

In accordance with the provisions of Memorandum of Understanding for Cruise Operations in Washington State (April 20, 2004 as amended 06 March 2006), please accept this letter on behalf of Celebrity Cruises Inc. for the 2006 cruise season.

The following Celebrity Cruises Inc. ship(s) operated in Washington waters during 2006:

Celebrity Cruises Inc:

Mercury - Seattle:

May 19, 26, June 2, 9, 16, 23, 30, July 7, 14, 21, 28,

August 4, 11, 16, 25, September 1, 8, 15, 18, 22, 25, 29

October 2, 6, 9, 13

Summit - Seattle:

September 25

Celebrity Cruises Inc. in Washington addressed the following key provisions of the MOU as follows:

Section 1.1 - Wastewater Management - Celebrity Cruises Inc. managed its wastewater in compliance with this section as follows:

In compliance with Section 1.1.1 and 1.1.2, the Mercury and Summit, held all gray and black water onboard until the ships were outside the waters included in this MOU. The Mercury has a Rochem Reverse Osmosis advanced wastewater purification system installed that treats all black and the majority of all gray water to Alaska legislation standards. The ship is currently certified by the US Coast Guard for continuous discharge in Alaska. The Summit has Hamann Marine Sanitation Devices installed However, neither of these systems is currently approved by the DOE for discharge in Washington. Based on a thorough review of ships' logs and records, we certify that our ships complied with these provisions of the MOU. Celebrity Cruises Inc. will make these records available to Ecology upon request.

Section 1.1.4 - Discharge of Residual Solids - Based on a review of Celebrity Cruises Inc. ships' logs and records, Celebrity Cruises Inc. certifies that we complied with the prohibition on discharging residual solids coming from any type of treatment system within 12 nautical miles from shore and while within the IMO "Area to Be Avoided" off the Washington Coast. Celebrity Cruises Inc. will make these records available to Ecology upon request.

Section 1.2 - Solid Waste Management - Based on a review of Celebrity Cruises Inc. ships' logs and records, Celebrity Cruises Inc. certifies that no solid wastes were discharged into waters subject to the MOU. Celebrity Cruises Inc. will make these records available to Ecology upon request. All solid wastes are held onboard for landing to an approved facility of for onboard

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incineration. In some instances, food wastes are processed onboard and discharged while underway at more than 6 knots speed and while the ship is greater than 12 nautical miles from the nearest land, thus exceeding the International Maritime Organization's MARPOL Annex V requirements.

<u>Section 1.3.1 through 1.3.4 - Hazardous Waste Management</u> - Based on a review of Celebrity Cruises Inc. ship's logs and records, Celebrity Cruises Inc. certifies that Hazardous Wastes were managed in accordance with these sections of the MOU. Hazardous waste was offloaded by *Summit* and *Mercury* when they called in:

Mercury.

Victoria: 09/16/ 06 (oily waste disposal), 09/30/06 (oily waste disposal), 10/14/06 (oily waste disposal): Contractor: Peninsula waste water services Ltd. This sludge is characterized Hazardous - all hazardous manifests are available for review upon request.

Vancouver: 10/07/06 (hazardous waste disposal): Contractor: Tymac Launch Service Ltd.

 Non hazardous sludge oil disposals at the port of Seattle - All received by an authorized contractor (Clean Harbors), all non-hazardous waste manifests are available for review upon request:

Date 05/19/06 05/26/06 06/02/06 06/09/06 06/16/06 06/23/06 06/30/06	Qty 5,274 gallons 4,800 4,716 4,800 5,000 4,540 4,782 +	Contractor Clean Harbors (Emerald Services Inc.)
07/07/06 07/14/06 07/21/06 07/28/06 08/04/06 08/11/06 08/18/06 08/25/06 09/01/06	4,314 5,000 3,800 4,771 4,610 4,588 4,699 4,800 + 5070 4,850 4,800 4,900	Clean Harbors (Emerald Services Inc.)

Summit

Landed all non-hazardous and hazardous waste in other locations outside of Washington Celebrity Cruises Inc. will make these additional records available to Ecology upon written request.

Section 5 - Marine Mammal Protection Act, Invasive Species Act, and the Washington Ballast Water Management Act - Based on a review of Celebrity Cruises Inc. ships' logs and records, Celebrity Cruises Inc. certifies that the provisions of the above laws were implemented as required by these laws. Celebrity Cruises Inc. will make these records available to Ecology upon request. All Celebrity Cruises Inc. ships fully comply with the appropriate sections of the Invasive Species Act by meeting and exceeding all international and U.S. Ballast Water Management and Reporting requirements found in Subpart D of 33 CFR part 151. Prior to each Alaska Cruising season, Celebrity Cruises Inc. prepares a binder for all ships deploying to the Pacific Northwest that includes all relevant environmental regulations for all west coast of North America and specifically the U.S. states and Canada. In that binder, we included the ballast water handling requirements for the state of Washington. The ship's specific management strategy was to eliminate the discharge of ballast. In this case, the ship managed to meet stability requirements



with other onboard liquid weight. No actions were taken by the ship that would have harassed or hazarded any protected mammal species.

Section 10 - Immediate self-reporting to Ecology of any incidences of non-compliance with any provisions of the MOU - Describe any incidences of non-compliance and when they were reported to Ecology and any corrective actions taken. Celebrity Cruises Inc. Ships experienced no violations of the provisions of the MOU during the 2006 season. We continue to fully cooperate with the Department of Ecology to fully investigate and correct the discharges that apparently occurred in MOU waters in September and October 2005.

I hereby certify that the above information is true and can be verified through documentation. If you have any questions or concerns, please call me at 305-982-2738.

Sincerely,

CELEBRITY CRUISES, INC

John Krousouloudis Senior Vice President,

arine Operations

JK/sbn

cc: Richard Pruitt

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December 1, 2006

Jeannie Summerhayes, Regional Director Washington State Department of Ecology Northwest Regional Office 3190 160th Avenue SE Bellevue, WA 98008-5452

Dear Ms. Summerhayes:

Re: Washington Cruise MOU Compliance Report: 2006 Cruise Season

In response to the request of the Washington State Department of Ecology for a certification of compliance with the provisions of the Memorandum of Understanding for Cruise Operations in Washington State (April 28, 2006); please accept this letter on behalf of Holland America Line for the 2006 cruise season

In calendar year 2006 the following Holland America Line (HAL) vessels operated in Washington State waters: Oosterdam, Ryndam, Veendam, Volendam, Westerdam and Zaandam. Dates of the calls were as follows:

- Oosterdam: Seattle, May 6 to September 23, 2006, weekly calls
- Ryndam: Port Angeles, May 4, 2006 one call; Seattle, May 5, 2006 one call
- Veendam: Seattle, May 5 and September 25, 2006, two calls
- Volendam: Seattle, April 22, 2006, one call
- Westerdam: Seattle May 7 to September 24, 2006, weekly calls
- Zaandam: Seattle May 5 to September 29, 2006, weekly calls

Holland America line (HAL) operations in Washington State addressed the following key provisions of the MOU as follows:

<u>Section 1.1. Wastewater Management.</u> HAL managed its wastewater in compliance with this section as follows: In compliance with Section 1.1.3, HAL submitted several emails documenting the issuance of the U.S. Coast Guard "Continuous Discharge" letters for the Oosterdam, Westerdam, Volendam, Zaandam, Statendam, Veendam, and Ryndam.

HAL certifies that these ships comply with the requirements of the MOU. HAL will make these records available to Ecology upon request.

<u>Section 1.1.4 Discharge of Residual Solids.</u> Based on a review of HAL ships' logs and records, HAL certifies that we complied with the prohibition on discharging residual solids coming from any type of treatment system within 12 nautical miles from shore

and while within the IMO "Area to Be Avoided" off the Washington Coast HAL will make these records available to Ecology upon request.

Section 1.2. Solid Waste Management. Based on a review of HAL ships' logs and records, HAL certifies that no solid wastes were discharged into waters subject to the MOU. No HAL vessels discharged solid waste in Washington State in 2006. HAL will make these records available to Ecology upon request

Section 1.3.1 through 1.3.4 Hazardous Waste Management. Based on a review of HAL ship's logs and records, HAL certifies that Hazardous Wastes were managed in accordance with these sections of the MOU HAL will make these records available to Ecology upon request. Hazardous waste was not offloaded from HAL vessels in Washington State in 2006.

Section 5. Marine Mammal Protection Act. Invasive Species Act and the Washington Ballast Water Management Act. Based on a review of HAL ship's logs and records, HAL certifies that the provisions of the above laws were implemented as required by these laws. HAL will make these records available to Ecology upon request

Section 10. Immediate self-reporting to Ecology of any incidences of non-compliance with any provisions of the MOU. On May 5, 2006, while Ryndam was in Seattle during it's only 2006 visit to Washington State waters, a sample was scheduled to be taken to meet the requirements of section 1 1.3 a) of the MOU. Due to a misunderstanding by the lab's sampling technician of the ships location in Seattle, the sample was not taken. Because it was the only opportunity in Seattle for a sample to be taken on Ryndam while in Washington State waters, no sample could be submitted to meet this requirement of the MOU. This was verbally reported to Amy Jankowiak of WDOE, by David Wetzel of Admiralty Environmental (on behalf of HAL) on May 10, 2006. To preclude further instances of this missed sample opportunity, the sample takers have been instructed to immediately contact their supervisors or a HAL representative when they can not locate a ship scheduled for sampling.

If you have any questions or concerns, please call me at (206) 301-5343.

Very truly yours,

William Morani Jr

Vice President Environmental Compliance

**Holland America Line** 

WAnoran



November 22, 2006

Ms. Jeannie Summerhays Regional Director Washington State Department of Ecology Northwest Regional Office 3190 160th Avenue SE Bellevue, WA 98008-5452

Dear Ms Summerhays:

Re: Washington Cruise MOU Compliance Report: 2006 Cruise Season

Section 10 of the Memorandum of Understanding for Cruise Operations in Washington State requires an annual submittal detailing the compliance with the MOU for each vessel within the NWCA that calls to a port in Washington for the previous cruise season

Please accept this letter on behalf of NCL for the 2006 cruise season.

The following ships operated in Washington waters during 2006:

- NORWEGIAN STAR Sailed from Seattle on 5/07, 5/14, 5/21, 5/28, 6/04, 6/11, 6/18, 6/25, 7/02, 7/09, 7/16, 7/23, 7/30, 8/06, 8/13, 8/20, 8/27, 9/03, 9/10, 9/17, and 9/24
- NORWEGIAN SUN Sailed from Seattle on 5/13, 5/20, 5/27, 6/03, 6/10, 6/17, 6/24, 7/01, 7/08, 7/15, 7/22, 7/29, 8/05, 8/12, 8/19, 8/26, 9/02, 9/09, 9/16 and 9/23
- NORWEGIAN WIND likely passed through Washington waters on the voyage to Vancouver on 4/30 and the voyage from Vancouver on 9/17 but never made a Washington port call. No discharges of any kind were made in waters subject to the MOU, within 12 nautical miles from shore and while within the IMO "Area to Be Avoided" off the Washington Coast.

NCL's operations in Washington State addressed the following key provisions of the MOU as follows:

Section 1.1. Wastewater Management. NCL managed its wastewater in compliance with this section as follows:

## Section 1.1.3 Advanced Wastewater Discharge Approval

NCL submitted information supporting its request to discharge treated wastewater while at berth to Ecology and was approved for continuous discharge in Washington waters on May 4th for both the NORWEGIAN STAR and NORWEGIAN SUN. Both of these ships are equipped with the Scanship Advanced Wastewater Treatment System and were sampled twice a month for the entire season. All sample results were submitted to Department of Ecology and were well within the standards detailed in the MOU.

Section 1.1.4 Discharge of Residual Solids.

Based on a review of NCL ships' logs and records, NCL certifies that it complied with the prohibition on discharging residual solids coming from any type of treatment system in waters subject to the MOU, within 12 nautical miles from shore and while within the IMO "Area to Be Avoided" off the Washington Coast NCL will make these records available to Ecology upon request

Section 1.2. Solid Waste Management.

Based on a review of NCL ships' logs and records, NCL certifies that no solid wastes were discharged into waters subject to the MOU NCL will make these records available to Ecology upon request All solid waste was collected and held aboard all ships and discharged ashore in Canada in accordance with Canadian and Company policies. Only compressed aluminum cans were landed in Seattle for recycling.

Section 1.3.1 through 1.3.4 Hazardous Waste Management.

Based on a review of NCL ship's logs and records, NCL certifies that Hazardous Wastes were managed in accordance with these sections of the MOU NCL will make these records available to Ecology upon request. All hazardous waste was collected and held aboard all ships and discharged ashore in Canada in accordance with Canadian and Company policies

Section 5. Marine Mammal Protection Act, Invasive Species Act, and the Washington Ballast Water Management Act.

Based on a review of NCL ship's logs and records, NCL certifies that the provisions of the above laws were implemented as required by these laws. NCL will make these records available to Ecology upon request.

- Prior to initial entry to Washington the NORWEGIAN STAR conducted a deep ocean exchange of ballast, but then held all ballast water aboard during the season
- The NORWEGIAN SUN also conducted a deep ocean exchange of ballast enroute to Washington. During each voyage, the vessel also exchanged some ballast tanks south of 50-deg N latitude, but was forced, due to design and safety considerations, to discharge limited quantities of Canadian ballast water in Seattle. Prior to each arrival, the vessel submitted the appropriate Ballast Report Form indicating the exemption.

Section 10. Immediate self-reporting to Ecology of any incidences of non-compliance with any provisions of the MOU.

There were no incidents of non-compliance.

I hereby certify that the above information is true and can be verified through documentation. If you have any questions or concerns, please call me at 305-436-4956.

Tilleand -

Since sely,

Randall R. Fiebrandt. P.E.

Director, Environmental Operations Norwegian Cruise Line/Orient Lines

7665 Corporate Center Dr.

Miami, FL 33126

(T) 305-436-4956 (F) 305-436-4159



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20 November 2006

Jeannie Summerhays, Regional Director Washington State Department of Ecology Northwest Regional Office 3190 160<sup>th</sup> Avenue SE Bellevue, WA 98008-5452

Dear Ms Summerhays:

Re: Washington Cruise MOU Compliance Report: 2006 Cruise Season

In accordance with the requirements of section 10 requiring certification of compliance with the provisions of Memorandum of Understanding for Cruise Operations in Washington State (April 20, 2004), please accept this letter on behalf of Princess Cruises. Our report for the 2006 cruise season is provided below.

The following ships cruised on regular itineraries in Washington waters during 2006:

## SUN PRINCESS DAWN PRINCESS

Princess Cruises operations in Washington State addressed the following key provisions of the MOU as follows:

<u>Section 1.1.</u> Wastewater <u>Management.</u> Sun, Diamond and Sapphire managed their wastewater in compliance with this section as follows:

- In compliance with Section 1.1.1 and 1.1.2, Dawn Princess held all treated and untreated gray and black water while in Washington waters. Based on a review of the ship's logs we confirm that the ship complied with the provisions of the MOU. The ship is fitted with three Hamworthy Membrane Bioreactors (MBRS) that treat Black and domestic grey water to meet the Alaskan in-port continuous discharge standard.
- In compliance with Section 1.1.1, 1.1.2 and 1.1.3, Sun Princess held all treated and untreated gray and black water while in Washington waters, with the exception of one voyage when the ship discharged all treated gray and black water and held all untreated gray water. Based on a review of the ship's logs we confirm that the ship complied with the provisions of the MOU. The ship is fitted with three Hamworthy Membrane Bioreactors (MBRS) that treat Black and domestic grey water to meet the Alaskan inport continuous discharge standard. The discharges in Washington State waters were in accordance with the approval granted by Dept. of Ecology on 04 May 2006

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<u>Section 1.1.4 Discharge of Residual Solids.</u> Records have been reviewed and no discharge of residual solids took place in Washington State waters or within 12 miles of land

Section 1.2. Solid Waste Management. Records have been reviewed and no solid wastes were discharged into Washington State waters. All waste management services are arranged and provided through our North American contractor, Waste Management Inc. To the best of our knowledge, we believe that solid waste management practices were in compliance with the MOU.

Section 1.3.1 through 1.3.4 Hazardous Waste Management. All of our hazardous waste operations in Seattle were handled by PSC as a subcontractor to Waste Management, Inc. Princess Cruises uses Waste Management, Inc. for all waste handling services in North America. All of the TSDF signed manifests that were received in our office were scanned and electronically sent to the ships so that they could be matched with the ship's copy. These records are available for you anytime you would like to review them. We are not aware of any problems or violations concerning Hazardous Waste operations in Seattle.

Section 5. Marine Mammal Protection Act, Invasive Species Act, and the Washington Ballast Water Management Act. Ballast water forms have been renewed and we confirm, to the best of our knowledge, that the DAWN PRINCESS did not discharge ballast water in Washington State waters. The SUN PRINCESS did discharge ballast water that complied with the State of Washington Ballast Water Management regulations.

I hereby certify that the above information is true and can be verified through documentation. If you have any questions or concerns, please call me at 661 753 2712.

Sincerely,

Andrew Phillips

Manager, Environmental Compliance

**Princess Cruises** 



Royal Caribbean International 1050 Caribbean Way Miami FL 33132 tel: 305 539 6000 www.royalcaribbean.com

November 27, 2006

Mr. Ray Hellwig
Regional Director
Washington State Department of Ecology
Northwest Regional Office
3190 160<sup>th</sup> Avenue SE
Bellevue, WA 98008-5452

Dear Mr. Hellwig:

Re: Washington Cruise MOU Compliance Report: 2006 Cruise Season

In accordance with the provisions of the Memorandum of Understanding for Cruise Operations in Washington State (April 20, 2004, amended April 2006), please accept this letter on behalf of Royal Caribbean International for the 2006 cruise season.

The following Royal Caribbean International ship operated in Washington waters during 2006:

:Vision of the Seas, Seattle: May 19<sup>th</sup>, 26th, June 2, 9, 16, 23, 30 July, 7,14, 21, 28, August 4, 11, 18, 25, September 1, 8,

Royal Caribbean International's operations in Washington addressed the following key provisions of the MOU as follows:

Section 1.1. Wastewater Management. Royal Caribbean International managed its wastewater in compliance with this section as follows:

In compliance with Section 1.1.1 and 1.1.2, Royal Caribbean International's ship, the *Vision of the Seas* held all gray and black water onboard until the ship was outside the waters included in this MOU. The Vision of the Seas has a Hydroxyl Advanced Wastewater Purification treatment system installed that treats all black water to international and US Federal standards. However, it was not approved for discharge in Washington State waters. Based on a thorough review of ships' logs and records, we certify that our ships complied with these provisions of the MOU. Royal Caribbean International will make these records available to Ecology upon request.

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Section 1.1.4 Discharge of Residual Solids. Based on a review of ship's logs and records, Royal Caribbean International certifies that we complied with the prohibition on discharging residual solids coming from any type of treatment system within 12 nautical miles from shore and while within the IMO "Area to Be Avoided" off the Washington Coast Royal Caribbean International will make these records available to Ecology upon request.

Section 1.2. Solid Waste Management. Based on a review of ship's logs and records, Royal Caribbean International certifies that no solid wastes were discharged into waters subject to the MOU. Royal Caribbean International will make these records available to Ecology upon request. All solid wastes are held onboard for landing to an approved facility or for onboard incineration. In some instances, food wastes are processed onboard and discharged while underway at more than 6 knots speed and while the ship is greater than 12 nautical miles from the nearest land, thus exceeding the International Maritime Organizations MARPOL Annex V requirements.

Section 1.3.1 through 1.3.4 Hazardous Waste Management. Based on a review of ship's logs and records, Royal Caribbean International certifies that Hazardous Wastes were managed in accordance with these sections of the MOU. Hazardous waste was offloaded by Vision of the Seas when they called in Victoria, BC. Royal Caribbean International will make these records available to Ecology upon written request.

Section 5. Marine Mammal Protection Act, Invasive Species Act, and the Washington Ballast Water Management Act. Based on a review of ship's logs and records, Royal Caribbean International certifies that the provisions of the above laws were implemented as required by these laws, Royal Caribbean International will make these records available to Ecology upon request. All Royal Caribbean International ships fully comply with the appropriate sections of the Invasive Species Act by meeting and exceeding all international and U.S. Ballast Water Management and Reporting requirements found in Subpart D of 33 CFR part 151. Prior to each Alaska Cruising season, Royal Caribbean International prepares a binder for all ships deploying to the Pacific Northwest that includes all relevant environmental regulations for all west coast U.S. states and Canada. In that binder, we included the ballast water handling requirements for the state of Washington. The ship's specific management strategy was to not discharge ballast. In this case, the ship managed to meet stability requirements with other onboard liquid weight. No actions were taken by the ship that would have harassed or hazarded any protected mammal species.

Mr. Ray Hellwig November 27, 2006 Page 3

Section 10. Immediate self-reporting to Ecology of any incidences of non-compliance with any provisions of the MOU. The Vision of the Seas experienced no violations of the provisions of the MOU.

I hereby certify that the above information is true and can be verified through documentation. If you have any questions or concerns, please call me at 305-982-2469.

Sincerely,

Captain William S. Wright

Senior Vice President Marine Operations

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