			State of W	ashingto	n Depart	tment of Ec	ology	/		Nor	thwest Regional Office
Cruise Ship Memorandum of										3190 160 <sup>th</sup> Ave SE	
DEPARTMENT OF Understanding, Cruise Operations in Bellevue, WA 98008											
ECOLOGY State of Washington State Inspection Report Phone: (425) 649-7000 Fax: (425) 649-7098											
Ir	spection Date	unty Receiving Waters					Ecology Inspector				
Septe	ember 25, 2021		NA	Kir	King Marine Waters			Evan Dobrowski & Amy Jankowiak			
Entry Time: 09:06am Photos Taken Sar			Samples	Imples Taken Inspection Announced			Discharges to: Surface Water				
Exit Time: 12:00pm Yes No				∐ Yes	res ⊠ No       Yes L_ No			Ground Water Dewater POTW			
Name and Location of Site Inspected: Additional Participants/Inspectors:									pants/inspectors:		
Pier	Pier 91										
Seat	Seattle, Washington										
On-Site Representative(s): Name/Title/Phone/e-mail											
Neda Domanovic, Environmental Officer  Responsible Official(s): Name/Title/Address/Phone/e-mail Other Facility Data:											
Patr	Patrick McGuire. Vice President. Environmental Compliance Notification made to Patrick McGuire										
Holla	and America Gro	up							on Septe	ember	13, 2021
450	Third Avenue W	est								othoric	ando
Seat	tie, WA 98119	uuira	Mhallanday	moricoa		m			IMO #93	etnena 78450	ands
200-	020-3009, PIIICg	Juire	enolianual	Sec	tion A.		aluate	he		10100	
	Black/Gray						liuatt	Hazai	dous		
	Wastewater System	$\boxtimes$	Residual Soli	ds 🛛 🖂	Record	ls/Reports		Waste Waste	e/ Solid e	$\boxtimes$	Sampling/Monitoring
	Discharge Locations	$\boxtimes$	Operation & Maintenance	$\boxtimes$	Sludge Dispos	Handling/ al	$\square$	Oily E	ilge Water	$\boxtimes$	Other
	Section	<b>B</b> :	For Vessels	Discha	rging ≥ ′	1nm from	Berth	n and a	≥ 6 Knots	Only	[2.1.3(A)]
	Schematics Match B System	lack/(	Gray Wastewate	r							
	Operations as Descr Documentation	ibed i	in Submitted								
	Daily 24-hour Contin Turbidity or Equivale	uous nt Mo	Monitoring for onitoring								
	Turbidimeter or Equi Equipment Functioni	valen ng Pr	t Monitoring operly								
	Auto Shut Down or Operational Controls to Insure System Shut Down if High Turbidity Occurs										
	Turbidity or Equivale	nt:		I							
	Trigger Level for Ear	Ly_Ala			Trigger L	evel for Shute	bwn:	51	ALD		
	Recorded Turbidity/E	Equiva	alent Levels Abc	ve Triggers	3:						
	Daily 24-hour Continuous Monitoring for Disinfection Effectiveness										
	Disinfection Effectiveness Monitoring Equipment Functioning Properly										
	Disinfection Effective	ness	Monitoring:								
	Auto Shut Down or C	pera	tional Controls t	0							
Insure System Shut Down if Disinfection System Upset Occurs											
	Disinfection System Operated and Maintained Properly										
	Disinfection System:										
			Section C:	For Ves	sels Dis	charging	Conti	inuous	sly [2.1.3(	B)]	

	Schematics Match Black/Gray Wastewater System					
	Cperations as Described in Submitted					
	Decumentation Daily 24-hour Continuous Monitoring for					
	Turbidity or Equivalent Monitoring					
	Equipment Functioning Properly					
	Auto Shut Down or Operational Controls to Insure System Shut Down if High Turbidity Occurs					
	Turbidity or Equivalent:					
	Last Calibration:					
	Trigger Level for Early Alarm:	Trigger Level for Shutdown:				
	Recorded Turbidity/Equivalent Levels Above Triggers:					
	Disinfection Effectiveness					
	Equipment Functioning Properly					
	Disinfection Effectiveness Monitoring:	APPLICABLE				
	Auto Shut Down or Operational Controls to Insure System Shut Down if Disinfection System Upset Occurs					
	Disinfection System Operated and Maintained					
	Disinfection System:					
	No Discharges Within ½ Miles From Shellfish	D. General (Approved to Discharge)				
	Beds/ Protocol (President's Point, Apple Tree Oove, Tyee Shoal, Middle Point (near Pt Townsend))					
	Discharges Immediately Stopped When High Turbidity Occurs					
	Discharges Immediately Stopped When					
	Immediate Notifications Made to WA Department of Health for Disinfection System Upset					
	Sampling Conducted 2/month, 1/month in Seattle (BOD, TSS, Fecal Coliform, pH, Chlorine Residual)					
	Whole Effluent Toxicity Testing 1 per 2 Years					
		Section E: General				
	Wastewater Discharge Records Review	Discharge records were reviewed (blackwater/graywater/residual solids) are maintained properly. No discharges found to be in the OCNMS, MOU waters or Washington state waters (MOU related waters). Further review will be done following the end of the season.				
$\boxtimes$	Wastewater Discharges protocol per MOU and managed properly	The discharge protocols are consistent with MOU requirements to not occur in MOU related waters.				
$\square$	Residual Solids Managed Properly/Disposal Protocol per MOU	Residual solids protocols are consistent with MOU requirements.				
$\boxtimes$	Hazardous Waste Managed Properly	Hazardous protocols are consistent with MOU requirements.				
$\square$	WA Hazardous Waste Guidelines Followed (Appendix vii)	Hazardous waste protocols are consistent with MOU requirements.				
	Solid Waste Managed Properly (zero garbage discharge)	Solid waste protocols are consistent with MOU requirements.				
$\square$	Photo/X-Ray Waste Managed Properly (fluids, cartridges,) and landed ashore	Photo and x-ray waste protocols are consistent with MOU requirements.				

	Dry-Cleaning Wastes and Byproducts (fluids,							
	sludge, filter materials…) Managed Properly (PERC – haz waste – landed ashore)	Dry cleaning protocols are consistent with MOU requirements.						
$\boxtimes$	Unused/Outdated Pharmaceuticals Managed Properly (safely disposed of)	Unused or outdated pharmaceuticals management protocols are consistent with MOU requirements.						
$\boxtimes$	Fluorescent and Mercury Vapor Lamp Bulbs Managed Properly (prevent release of mercury)	Fluorescent and mercury vapor lamp bulbs protocols for management are consistent with MOU requirements.						
$\boxtimes$	Waste Reduction/Reuse/Recycling Opportunities Maximized (glass, cardboard, aluminum & steel cans)	Waste reduction/reuse/recycling opportunities appear to be maximized per MOU requirements.						
$\boxtimes$	Batteries Managed Properly (recycled, reclaimed, disposed of properly)	Batteries management protocols are consistent with MOU requirements.						
$\boxtimes$	Incinerator Ash Managed Properly and minimized volume (haz waste segregation and annual testing)	Incinerator ash management is consistent with MOU requirements.						
$\boxtimes$	Oily Bilge Water Managed Properly (<15 ppm, no visible sheen and underway)	Oily bilge water protocols are consistent with MOU requirements.						
$\boxtimes$	Ballast Water Managed Properly (per Wash regs –reporting, treated or if open sea exchange >200 nm from outside EEZ, 50nm if not EEZ)	The vessel employs ballast water exchange outside 200 nm and treatment.						
$\boxtimes$	OCNMS rules and regs followed	The discharge protocols are consistent with MOU requirements and are not to occur in OCNMS waters.						
Additional General Questions								
$\boxtimes$	How is deck runoff and hull cleaning handled (scuppers) (non-toxic/phosphate free cleaners, biodegradable)	Deck runoff and hull cleaning protocols are consistent with MOU requirements.						
$\boxtimes$	How is maintenance performed on the outside of the vessel (paint chipping, painting, etc)	Outside vessel maintenance protocols are consistent with MOU requirements.						
$\boxtimes$	Sculleries and Galleys – type of detergents and degreasers used (phosphate free and non-toxic)?	Restaurants and galleys use detergents and degreasers that are non- toxic and phosphate free.						
$\boxtimes$	How are food waste discharges handled (prevention of erroneous materials)?	Food waste discharge protocols are consistent with MOU requirements and records reviewed show no discharges in MOU related waters.						
$\boxtimes$	Medical sinks/floor drains, chem. stor areas wastes go where (plugged, blackwater, bilge)?	Medical sinks/floor drains are reported as connected to Blackwater.						
$\boxtimes$	Where is pool and spa water discharged? Dechlorinated/debrominated and underway?	Pool and spa water protocols are consistent with MOU requirements.						
$\boxtimes$	What type of fuel is used and percent sulfur content?	<0.1% sulfur fuel content used when in MOU waters or EGCS treated equivalent is used throughout the route.						
Other:								
		Section F: Sampling Results						
	Parameter Results							
	Biochemical Oxygen Demand 5-Da	y (BOD <sub>5</sub> )						
	Total Suspended Solide (TSS) Fecal Coliform	APPLICABLE						
	Ph							
	Ammonia, Nitrogen							
	Section	G: Summary of Findings/Comments						

#### Introduction

Evan Dobrowski, Washington State Department of Ecology (Ecology) Northwest Regional Office, Water Quality Program (NWRO-WQ) conducted the inspection of the Holland America Line's NIEUW AMSTERDAM on September 25, 2021. Amy Jankowiak, Ecology NWRO-WQ, assisted in conducting the inspection. The main contact on board the NIEUW AMSTERDAM was Neda Domanovic, Environmental Officer (EO) for the vessel. Prior notification of the visit was given on September 13, 2021 for security protocol. The purpose of the inspection was to evaluate compliance with the *Memorandum of Understanding Cruise Operations in Washington State* (MOU), as amended. The NIEUW AMSTERDAM is not approved to discharge wastewater in MOU waters.

The NIEUW AMSTERDAM launched in 2010, and is 936 feet long with about a 26-foot draft. The passenger capacity is approximately 2,100 with a crew capacity of about 900. The vessel has six engines and two azipods for propulsion. The NIEUW AMSTERDAM is scheduled for 11 port calls in Seattle for weekly, week long cruises to Alaska between July 24, 2021 and October 2, 2021.

#### **Inspection**

We arrived at the cruise terminal at Pier 91 and began by following COVID protocols. After receiving instructions, we boarded the ship at 9:06 a.m. and began with introductions and a plan for the day with Neda Domanovic, EO. We started in the Engine Control Room (ECR) and discussed various waste streams and discharge protocols and locations of discharges with Neda Domanovic along with additional staff. We viewed records and discussed systems and protocols. We then viewed the Exhaust Gas Cleaning System (EGCS), bilge treatment, and the Hamworthy membrane bioreactor advanced wastewater treatment system (AWTS) for blackwater and graywater treatment. We then toured the food waste, laundry, garbage room material sorting, and hazardous waste areas. The inspection was then finalized with a brief debriefing and we disembarked the vessel at 12:00 p.m.

Discharge Types and Protocols in MOU waters, Washington State waters or the Olympic Coast National Marine Sanctuary (OCNMS) (MOU related waters):

The discharge protocols are established at the start of the Seattle-Alaska season with voyage planning, meetings and trainings. A passage Plan is created for each stretch of the voyage. The Passage Plan includes each discharge type, the location of allowed discharges for that type, the planned estimated start and stop of each discharge type as well as remarks on local requirements. The Passage Plan for the current voyage depicts no discharges of any type listed (sewage or graywater, bio sludge, food waste, treated bilge water, incinerator operations, exhaust gas cleaning system, ballast water, additional operations such as ash scattering or soot blowing) within MOU related waters. In addition, there are regular departure meetings to go over the near-term plan, including Bridge staff, ECR staff, and the EO. As the vessel travels into the Strait of Juan de Fuca from Alaska (photo #02), all discharge valves to water are shut off 12 miles outside the OCNMS. Discharges are allowed again after exiting the Strait and more than 12 miles out to sea.

When in an area of allowed discharge, the protocol starts with the Bridge staff notifying the ECR staff that they are in an area of allowed discharge. A 30-minute notice is provided to ECR staff when coming within 12 miles for discharges to stop. All discharges are recorded both on paper logbooks as well as in their electronic NAPA system. Comparisons of the two data points are completed daily.

For black water and gray water, the latitude and longitude coordinates are recorded in the NAPA Permeate as their *Sewage and Graywater Discharge Record Book* (Sewage/Graywater Log), which is both manually on paper, electronically recorded and entered into NAPA, and was reviewed for recent discharges. The date, time and location of both the start and the stop of the discharges are recorded, along with the volume, discharge type, flow rate, and speed. The recent Sewage/Graywater Logs were reviewed and all discharges appeared to be outside of the MOU related waters.

#### Discharge Types

Blackwater and Graywater system (photo #04):

Black water and Graywater goes to one of 2 AWTS Hamworthy systems. Discharges take place outside of MOU related waters. Flow from the collection tanks first goes through screening presses (photo #15) with residual solids incinerated. Liquid moves by vacuum to the first stage of the bioreactor tank for biological treatment with air circulation. Liquid then moves to the inter-stage filters with solids going to the screenings tanks and liquid to the filtrate tank (photo #16) and second stage of the bioreactor tank for further aeration. Some solids can be sent back to the screening press or stage 1 of the MBR. Liquid from the bioreactor goes through the membranes for ultrafiltration then to the permeate tank and recirculated or discharged overboard. Prior to discharging overboard the effluent goes through final stage UV disinfection (photo #11).

Total suspended solids (TSS) (equivalent to turbidity) is monitored continuously at UV disinfection. If TSS exceeds 30 mg/l, the system automatically stops discharging and holds. PH is also monitored for adjustments. There are several monitors throughout the system that are used to access controls as well as in the ECR. The vessel conducts its own laboratory monitoring for process control, splits samples with a land-based lab for comparability.

# Bilge:

Oily bilge water is collected to the oily bilge tank (photo #7) and is treated with a FACET and centrifugal oily water separator (COWS) (photo #08). The oily bilge is treated to less than 15 parts per million (ppm) oil content. Prior to discharge, the clean bilge is sent through "white box" (photo #10) which can't be bypassed and doesn't allow discharges of greater than 15 ppm. The treated oily bilge water is then discharged outside of MOU related waters at a maximum of 15 ppm, but typically 3-7 ppm, and outside of MOU related waters. The overboard discharge was locked during the inspection. The Chief Engineer has the one key to the white box, and discharges of clean bilge and offloads of oily sludge are recorded in the Oil record Book. No bypasses or re-routing around the OWS or white box has been known to occur. If there is any water other than bilge that combines with bilge water, it would be treated as bilge for treatment. The vessel also has the ability to pump out the bilge to shore-based collection.

# Ballast and Pools:

Ballast water is treated on board as necessary with a filter and UV treatment system with exchanges done at greater than 200 nautical miles.. There are three main pools and five Jacuzzis. They are all treated with bromine and all discharges are done outside 12 miles after de-chlorination and pH balancing (outside MOU related waters).

# Food Waste:

Food waste is sorted in the waste sorting room into screeners (photo #26) that feed the seven bio digesters (photo #25). Food is sent through a screener that screens out plastics and large items before going into the bio digesters which are located in the galley and waste sorting rooms. Galleys use Ecolab phosphate free and non-toxic detergents and degreasers. Food waste discharges are logged in the NAPA system and Garbage Record Book.

# Outside Vessel:

Deck wash is done with NPDES VGP allowed materials (non-toxic, phosphate free, biodegradable cleaners) and processes and in international waters. Outside vessel maintenance such as paint chipping and painting would only be done at port with Port of Seattle permission following best management practices. Outside vessel maintenance has not been occurring at the Port of Seattle by this vessel this season.

### Laundry:

Dry cleaning is not done on board. Laundry water is sent to Hamworthy treatment system and discharged outside of MOU related waters.

### Medication:

Unused or outdated medications are sent back to manufacturer/pharmacy and narcotics are incinerated or offloaded as hazardous waste. Red bag waste in the medical facility is incinerated or offloaded as hazardous waste. Sharps are sent to the hazardous waste locker for off-loading as bio-hazardous waste. Drains from the medical facility go to the blackwater tanks.

# Solid and Hazardous Waste:

Photo waste (photo #24) goes through a silver recovery unit with offloads when silver is less than 5 ppm. Tests are logged and kept. X-rays are done digitally without any waste. Fluorescent bulbs are crushed on board with a mercury vapor removal system (bulb crusher) or offloaded. Filters are offloaded as hazardous waste. Hazardous waste materials are stored separately and offloaded. Solid waste (garbage, recyclables (photo #20), etc) is collected, sorted, and either reused, recycled, incinerated (photo #20) or off-loaded to shore as appropriate. Waste minimization efforts are done by tracking, material usage analysis, and minimizing materials. Solid and hazardous waste is offloaded in Seattle during this route this season using Clean Harbors and Waste Management. Hazardous waste offload records were reviewed. The incinerator is used primarily for cardboard that can't be recycled and some soft plastics. Incinerator ash is offloaded after testing as non-hazardous waste.

#### EGCS:

ECA fuel-sulfur compliance is achieved either through the use of 0.1% sulfur content fuel when in MOU waters, or with higher sulfur heavy fuel oil (HFO) treated by the Ecospray EGCS to achieve equivalent emissions. Marine gas oil (MGO) is typically used when the EGCS is not in use. The vessel is also equipped for shore power, the vessel was on shore power at the time of inspection. The vessel's protocol is to not discharge ECGS washwater in MOU related waters as part of a voluntary pause. The vessel was bunkering fuel (photo #03) during the inspection. The vessel uses an open loop EGCS. Water is sent up the stack and spray nozzles clean the exhaust and send the water back down to a process tank and onto filtration (photo #05) before any discharge. Two engines of the four used for EGCS were using the soot filter, and the remaining two engines are dedicated for MGO fuel usage. In the open-loop mode, the volume of water is too high for filtration for all of the water (700-800 cubic meters/hour). Filtered soot is collected and offloaded as hazardous waste. Monitoring is done of both the air exhaust as well as the discharge water. Continuous emissions monitoring system (CEMS) (photo #06) measures pH, turbidity, PAH, and temperature at the influent, after the tower, and the effluent.

#### Conclusions and Recommendations

The protocols for discharges are clear. Records were orderly and appeared consistent with the MOU. The treatment systems appear to be operating well.

Attachments: Photographs

Copies to:

Neda Domanovic, EO, Nieuw Amsterdam Mark Toy, Health Donna Spalding, CLIA-NWC Alex Adams, Port of Seattle Amy Jankowiak, Ecology Evan Dobrowski, Ecology Central Files: Holland America Line – NIEUW AMSTERDAM; WQ 6.1

Section H: Signatures Agency/Office/Telephone: Name and Signature of Inspector: Date Amy Jankowiak, Compliance & Technical Department of Ecology Assistance Unit Supervisor Northwest Regional Office November 8, 2021 Water Quality Program 206-594-0165 Evan Dobrowski, Stormwater & Maritime Department of Ecology **Compliance Specialist** Northwest Regional Office Water Quality Program 206-594-0175



Photo # 1 Image: IMG\_0147 Date: 9/25/2021 Taken by: Amy Jankowiak Description: EGCS soot bag



Photo # 2 Image: IMG\_0360 Date: 9/25/2021 Taken by: Evan Dobrowski Description: Bridge – Navigation map



Photo # 3 Image: IMG\_0361 Date: 9/25/2021 Taken by: Evan Dobrowski Description: Bridge – View of bunkering Fuel



Photo # 4 Image: IMG\_0326 Date: 9/25/2021 Taken by: Evan Dobrowski Description: Hamworthy Schematic



Photo # 5 Image: IMG\_0148 Date: 9/25/2021 Taken by: Amy Jankowiak Description: EGCS – soot filters



Photo # 6 Image: IMG\_0146 Date: 9/25/2021 Taken by: Amy Jankowiak Description: EGCS – Continuous Emissions Monitoring System (CEMS)



Photo # 7 Image: IMG\_0153 Date: 9/25/2021 Taken by: Evan Dobrowski Description: Bilge – separation tank



Photo # 8 Image: IMG\_0158 Date: 9/25/2021 Taken by: Amy Jankowiak Description: Bilge – Centrifugal oily water separator



Photo # 9 Image: IMG\_0165 Date: 9/25/2021 Taken by: Amy Jankowiak Description: Hamworthy – interstage filters



Photo # 10 Image: IMG\_0315 Date: 9/25/2021 Taken by: Evan Dobrowski Description: Bilge – White Box



Photo # 11 Image: IMG\_0171 Date: 9/25/2021 Taken by: Amy Jankowiak Description: Hamworthy UV



Photo # 12 Image: IMG\_0300 Date: 9/25/2021 Taken by: Evan Dobrowski Description: EGCS Seawater piping



Photo # 13 Image: IMG\_0288 Date: 9/25/2021 Taken by: Evan Dobrowski Description: Engine Control Room Key box



Photo # 14 Image: IMG\_0333 Date: 9/25/2021 Taken by: Evan Dobrowski Description: Alfa Laval Ballast Water UV



Photo # 15 Image: IMG\_0314 Date: 9/24/2021 Taken by: Evan Dobrowski Description: Hamworthy Screen press



Photo # 16 Image: IMG\_0330 Date: 9/25/2021 Taken by: Evan Dobrowski Description: Hamworthy Filtrate, Screening piping and pumps



Photo # 17 Image: IMG\_0352 Date: 9/25/2021 Taken by: Evan Dobrowski Description: Medical Waste



Photo # 18 Image: IMG\_0164 Date: 9/25/2021 Taken by: Amy Jankowiak Description: Cleaning Area drains to Hamworthy



Photo # 19 Image: IMG\_0347 Date: 9/25/2021 Taken by: Evan Dobrowski Description: Garbage Room (GR) - Compactor



Photo # 20 Image: IMG\_0350 Date: 9/25/2021 Taken by: Evan Dobrowski Description: GR – incinerator shredder



Photo # 21 Image: IMG\_0349 Date: 9/25/2021 Taken by: Evan Dobrowski Description: GR – Glass Crusher



Photo # 22 Image: IMG\_0311 Date: 9/25/2021 Taken by: Evan Dobrowski Description: Engine Room – Paint rags and Used oil filter storage



Photo # 23 Image: IMG\_0338 Date: 9/25/2021 Taken by: Evan Dobrowski Description: GR – Hazardous Waste Storage



Photo # 24 Image: IMG\_0175 Date: 9/25/2021 Taken by: Amy Jankowiak Description: GR – Hazardous Waste Storage – Photo Waste



Photo # 25 Image: IMG\_0149 Date: 9/25/2021 Taken by: Amy Jankowiak Description: Food Waste Collection tank



Photo # 27 Image: IMG\_0176 Date: 9/25/2021 Taken by: Amy Jankowiak Description: Food Waste screener/bio-digester



Photo # 26 Image: IMG\_0342 Date: 9/25/2021 Taken by: Evan Dobrowski Description: Garbage Sorting Room – Food Screener



Photo # 28 Image: IMG\_0359 Date: 9/25/2021 Taken by: Evan Dobrowski Description: Laundry – Chem storage