PRINCESS

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January 7, 2005

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

Dear Mr. Hellwig:

Re: Washington Cruise MOU Compliance Report: 2004 Cruise Season

In response to the request of the Washington State Department of Ecology on November 29, 2004, for a 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 2004 cruise season is provided below.

The following ships cruised on regular itineraries in Washington waters during 2004:

DIAMOND PRINCESS
SAPPHIRE PRINCESS

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

Section 1.1. Wastewater Management. Diamond and Sapphire managed their wastewater in compliance with this section as follows:

- In compliance with Section 1.1.1 and 1.1.2, Princess Cruises' 2004 policy was to hold all treated and untreated gray and black water while in Washington waters. DIAMOND PRINCESS complied with this policy the entire cruising period, however, SAPPHIRE PRINCESS discharged treated permeate from their Advanced Wastewater Treatment System in waters subject to the MOU without Department of Ecology approval. The reason for this non conformity was a misunderstanding onboard the ship that the Coast Guard Approval letter for continuous discharge in Alaskan ports, and all of the regulatory requirements that go along with maintaining that approval, was satisfactory for discharge of treated permeate in waters subject to the MOU.
- In preparing this report the SAPPHIRE PRINCESS confirmed that they had complied with the requirements of the MOU, however as part of our internal process the records were also reviewed by the environmental compliance department. It was during this review on 16 December that it first came to light that the ship had discharged MBR permeate in waters subject to the MOU.

Princess Tours
2815 2nd Avenue Suite 400
Seattle, Washington 98121-1299
Corporate 206 336 6000
Fax 206 336 6100
www.princess.com

- SAPPHIRE PRINCESS came directly from the shipyard and arrived in Seattle in early June 2004. 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. The certification testing was conducted during the crossing by Analytica Labs and the results were then reviewed and provided to the Coast Guard and the Alaska Department of Environmental Conservation.
- Approval for in-port continuous discharge for Alaskan waters was granted by the Coast Guard on 09 JUNE 2004 and the approval letter was immediately sent to the ship. Apparently the ship concluded that this letter also applied to Washington State waters.
- The MBRS functioned properly throughout the season and all of the twice-monthly regulatory sample results were satisfactory. These records are available to you should you choose to review them. While we are embarrassed about this significant oversight for DOE approval, we are confident that the discharges were in compliance with the MOU standards and that no pollution resulted from this unfortunate matter.

Corrective Actions:

1. We will proceed with the Washington approval process for discharge via the MBRS up to 1 mile from berth for the 2005 season for DIAMOND and SAPPHIRE.
2. Waste water discharge records will be provided by the ship to the environmental compliance department after each voyage and they will be reviewed periodically throughout the season to allow for timely corrective action in the event any violations of the MOU are detected.
3. Written instructions to the ship will be reviewed and revised as necessary to improve understanding of all of the regional discharge requirements.

- During the above review process, we also discovered that SAPPHIRE PRINCESS discharged grey water into waters subject to the MOU during their first cruise on 11-13 June 2004.
- Prior to commencing the regular Alaskan cruising season, SAPPHIRE PRINCESS carried out a mini cruise departing Seattle 11 June calling at Victoria on 12 June and returning to Seattle on 13 June.
- On the evening of 11 June the ship commenced discharge of grey water while in Canadian waters. This discharge continued as the ship crossed into waters subject to the MOU prior to calling at Victoria. On departure from Victoria on 12 June discharge of grey water again commenced while the ship was in Canadian waters and continued into subject waters.
- These discharges took place while the ship was more than 4 miles from land in the Straits of Juan de Fuca, the areas where discharges had previously been permitted prior to the MOU. Charts and discharge records are available for your review if needed.

Corrective Actions

1. Waste water discharge records will be provided by the ship to the environmental compliance department after each voyage and they will be reviewed periodically throughout the season to allow for timely corrective action.
2 Written instructions to the ship will be reviewed and revised as necessary to improve understanding of all of the regional discharge requirements.
3. Prior to commencement of next Alaska season each ship will be visited by a member of the environmental compliance department staff to ensure that all regulations are understood and complied with.

Section 1.1.4 Discharge of Residual Solids. 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. The annual hazardous waste report is currently being prepared in conjunction with our hazardous waste subcontractor PSC, and will be submitted when complete.

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 neither DIAMOND nor SAPPHIRE discharged ballast water in Washington State waters.

I would like to meet with you at your earliest opportunity to discuss these incidents and the corrective actions we are talking, to make sure we comply fully with the MOU in 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 661 753 2745.

Sincerely,

George Wright
Vice President, Environmental Compliance
Princess Cruises

January 12, 2005
Sent Via Airborne

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DEPT OF ECOLOGY

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

Dear Mr. Hellwig:

Re: PRINCESS CRUISES WA MOU LETTER 1.7.05

This letter provides further certification of compliance with the MOU following our meeting with the Department of Ecology on Jan 10, 2005. The points listed below should be read in conjunction with the referenced letter.

Section 1.1. Wastewater Management.

- We have reviewed the discharged records for DAWN PRINCESS voyage that included the Seattle port call on 14 SEP 04 and confirmed that they complied with the MOU. The records are available to you if you would like to review them.

- Specific information concerning discharge locations, times, and quantities are contained in Enclosure 1.

- Our instructional letter to the ships concerning special requirements for the Alaska cruising season and guidelines spreadsheet are included as Enclosures 2 & 3.

Corrective Actions (in addition to actions 1,2,3 for both cases in the referenced letter):

4. We will reinforce to the ships the requirement to immediately self-report non-compliance with any provision of the MOU to the Department of Ecology using the 24-hour number.

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 2745.

Sincerely,

George Wright
Vice President, Environmental Compliance

Enclosures: 3

24305 T[illegible] Center
Canyo[illegible] 91355-4999
Corporate 661 753 [illegible]
Fax 661 259[illegible]
www.[illegible]

NORWEGIAN CRUISE LINE

NCL America

January 6, 2005

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

Dear Mr. Hellwig:

Re: Washington Cruise MOU Compliance Report: 2004 Cruise Season

In response to the request of the Washington State Department of Ecology on November 29, 2004, for a 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 Norwegian Cruise Line (NCL) for the 2004 cruise season.

The following ships operated in Washington waters during 2004:

- NORWEGIAN STAR – Sailed from Seattle on 5/30, 6/06, 6/13, 6/20, 6/27, 7/04, 7/11, 7/18, 7/25, 8/01, 8/08, 8/15, 8/22, 8/29, 9/05, 9/12 & 9/21.
- NORWEGIAN SPIRIT – Arrived in Seattle on 5/12 and sailed from Seattle on 5/15, 5/22, 5/29, 6/05, 6/12, 6/19, 6/26, 7/03, 7/10, 7/17, 7/24, 7/31, 8/07, 8/14, 8/21, 8/28, 9/04, 9/11 & 9/18.
- NORWEGIAN SUN made a single stop in Seattle on 4/30.
- NORWEGIAN WIND made a single stop in Seattle on 5/06.

7665 Corporate Center Drive, Miami, FL 33126 Tel. 305-436-4000 Fax 305-436-4159 www.ncl.com

NCL's operations in Washington 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:

- In compliance with Section 1.1.1 and 1.1.2, NCL held all treated and untreated gray and black water while in Washington waters until certain vessels were approved for continuous discharge, as noted below. Based on a thorough review of ships' logs and records we certify that our ship(s) complied with these provisions of the MOU. NCL will make these records available to Ecology upon request.

  NORWEGIAN SUN, NORWEGIAN WIND, NORWEGIAN STAR, NORWEGIAN SPIRIT - All have Scanship Advanced Wastewater Treatment Systems.

- In compliance with Section 1.1.3, NCL submitted information supporting its request to discharge treated wastewater while at berth to Ecology in May 2004 for the NORWEGIAN STAR and NORWEGIAN SPIRIT and followed that up with copies of the CG Alaska approval letters, when available. Each of these ships has the Scanship Advanced Wastewater Treatment System. Approval to discharge while at berth was received from Ecology on 12 August 2004 for both the NORWEGIAN STAR and NORWEGIAN SPIRIT.

Section 1.1.4 Discharge of Residual Solids. Based on a review of the ships' logs and records, from the four ships noted above, NCL 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. NCL will make these records available to Ecology upon request.

Section 1.2. Solid Waste Management. Based on a review of the ships' logs and records from the four ships noted above, NCL certifies that no solid wastes were discharged into waters subject to the MOU. NCL will make these records available to Ecology upon request. With the exception of food waste, all solid waste was separated and processed aboard, incinerated at sea or held for shoreside disposal in Victoria (STAR) or Prince Rupert, Juneau and Seattle (SPIRIT). When the NORWEGIAN SPIRIT arrived in Seattle (May 12th), after crossing from Hong Kong, there was considerable solid waste offloaded to Waste Management for the next 2 days. During the season, on nine occasions, the vessel offloaded solid waste, again to Waste Management, via barge. Food waste was processed in accordance with MARPOL requirements and discharged at sea at distances greater than 12 miles from land.

Section 1.3.1 through 1.3.4 Hazardous Waste Management. Based on a review of the ship's logs and records from the four ships noted above, 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. No hazardous waste was offloaded in Washington ports with the exception of the following:

Several truckloads of oily sludge (considered hazardous waste in Washington) were delivered in Seattle from the NORWEGIAN SPIRIT upon arrival on May 12th.

Section 5. Marine Mammal Protection Act, Invasive Species Act, and the Washington Ballast Water Management Act. Based on a review of the ship's logs and records from the four ships noted above, 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 STAR and SPIRIT conducted a deep ocean exchange of ballast and then exchanged ballast in Alaska. Neither vessel was required to de-ballast this water during the season.

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 305-436-4843 or Randall Fiebrandt at 305-436-4956.

Sincerely,

Peter L. Randall
VP, Environmental & Regulatory Affairs
NCL (Bahamas) Ltd.
Ph: 305-436-4843
Cell: 786-210-0257
Email: prandall@ncl.com

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Telex 479 495 Vees

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V. Ships Leisure S.A.M.

Ms Ann E. Kenny,
Senior Regional Planner,
North West Regional Office,
State of Washington Department of Ecology,
3190 – 160th Ave SE,
Bellevue,
Washington WA 98008-5452
USA

Monaco, 11 January 2005

Our ref.: 1070/SRP/sb

Dear Ms Kenny,

As the Company responsible for the operation of the vessel, we are forwarding this letter on behalf of Owners Radisson Seven Seas Cruises.

The following information is provided pursuant to the April 20 2004 Memorandum of Understanding (MOU) between the State of Washington, the Port of Seattle and the Northwest Cruise Ship Association.

In the calendar year 2004 the following Radisson Seven Seas Cruises vessel called at ports in Washington State:-

Seven Seas Mariner – Seattle 24/5/04

In compliance with section 1.1.1 and 1.1.2 of the MOU the above vessel held all treated and untreated grey and black water whilst in Washington waters. The Master & Environmental Officer have reviewed the waste water discharge logs and can confirm that the ship is in compliance with the provisions of the MOU.

All other provisions of the MOU have been complied with, and we hereby certify that this information is true and can be verified through documentation, which will be made available upon request.

Should you have any further questions, please do not hesitate to contact the undersigned.

Yours Sincerely,

D. Rogers

Dawn Rogers
Marine Manager

Tel. +377 92 05 10 50
Telex 479 495 Vees

"Vague Marine" - 24 Av. de Fontvieille
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V. Ships Leisure S.A.M.

Ms Ann E. Kenny,
Senior Regional Planner,
North West Regional Office,
State of Washington Department of Ecology,
3190 – 160th Ave SE,
Bellevue,
Washington WA 98008-5452
USA

Monaco, 11 January 2005

Our ref.: 1070/SRP/sb

Dear Ms Kenny,

As the Company responsible for the operation of the vessel, we are forwarding this letter on behalf of Owners Silver Seas Cruises.

The following information is provided pursuant to the April 20 2004 Memorandum of Understanding (MOU) between the State of Washington, the Port of Seattle and the Northwest Cruise Ship Association.

In the calendar year 2004 the following Silver Seas Cruises vessel called at ports in Washington State:-

Silver Shadow – Seattle 23/08
Seattle 10/9 – 11/9

In compliance with section 1.1.1 and 1.1.2 of the MOU the above vessel held all treated and untreated grey and black water whilst in Washington waters. The Master & Environmental Officer have reviewed the waste water discharge logs and can confirm that the ship is in compliance with the provisions of the MOU.

All other provisions of the MOU have been complied with, and we hereby certify that this information is true and can be verified through documentation, which will be made available upon request.

Should you have any further questions, please do not hesitate to contact the undersigned.

Yours Sincerely,

Roberto DELLEPIANE
Marine Manager

Celebrity Cruises

January 14, 2005

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

Dear Mr. Hellwig:

Re: Washington Cruise MOU Compliance Report: 2004 Cruise Season

In response to the request of the Washington State Department of Ecology on November 29, 2004 for a certification of compliance with the provisions of the Memorandum of Understanding for Cruise Operations in Washington State (April 20, 2004), please accept this letter on behalf of Royal Caribbean Cruises Ltd. for the 2004 cruise season.

The following ship operated in Washington waters during 2004:

Celebrity Cruises Inc:

- *Mercury;* Seattle: June 4, 11, 18, 25
  July 2. 9. 16, 23, 30
  August 6, 13, 20, 27

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

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

- In compliance with Section 1.1.1 and 1.1.2, Royal Caribbean Cruises Ltd.'s ship, the *Mercury*, held all gray and black water onboard until the ship was 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 was and is currently certified by the US Coast Guard for continuous discharge in Alaska. Based on a thorough review of ships' logs and records, we certify that our ships complied with these provisions of the MOU. Royal Caribbean Cruises Ltd. will make these records available to Ecology upon request.

Section 1.1.4 Discharge of Residual Solids. Based on a review of Royal Caribbean Cruises Ltd. ships' logs and records, Royal Caribbean Cruises Ltd. 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 Cruises Ltd. will make these records available to Ecology upon request.

Section 1.2. Solid Waste Management. Based on a review of Royal Caribbean Cruises Ltd. ships' logs and records, Royal Caribbean Cruises Ltd. certifies that no solid wastes were discharged into waters subject to the MOU. Royal Caribbean Cruises Ltd. will make these records available to Ecology upon request. All solid wastes were held onboard for landing to an approved facility, or incinerated onboard, or in the case of food waste, processed and discharged while underway at more than six knots speed and while the ships is greater than twelve 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 Royal Caribbean Cruises Ltd. ship's logs and records, Royal Caribbean Cruises Ltd. certifies that hazardous wastes were managed in accordance with these sections of the MOU. Hazardous waste was offloaded when the ship called in Vancouver and Victoria British Columbia and Los Angeles. Royal Caribbean Cruises Ltd. will make these records available to Ecology upon request.

Section 5 Marine Mammal Protection Act, Invasive Species Act, and the Washington Ballast Water Management Act. Based on a review of Royal Caribbean Cruises Ltd. ship's logs and records, Royal Caribbean Cruises Ltd. certifies that the provisions of the above laws were implemented as required by these laws. Royal Caribbean Cruises Ltd. will make these records available to Ecology upon request. All Royal Caribbean Cruises Ltd. 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 Cruises Ltd. 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 *Mercury* 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. Royal Caribbean Cruises Ltd. Ships experienced no violations of the provisions of the MOU.

Mr. Ray Hellwig
January 14, 2005

Page Three

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 305-982-2728.

Sincerely,

CELEBRITY CRUISE, INC.
ROYAL CARIBBEAN CRUISES LTD.

John Krousouloudis
Vice President, Marine Operations
Celebrity Cruises Inc.

JK/sbn

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Holland America Line

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January 5, 2005

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

Dear Mr. Hellwig:

Re: Washington Cruise MOU Compliance Report: 2004 Cruise Season

In response to the request of the Washington State Department of Ecology on November 29, 2004, for a 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 Holland America Line for the 2004 cruise season. An initial response was filed on December 15, 2004.

In calendar year 2004 the following Holland America Line (HAL) vessels called at ports in Washington State: ms Amsterdam, ms Oosterdam, ms Veendam and ms Zaandam. Amsterdam and Oosterdam made weekly calls in Seattle at Pier 30 and Zaandam made one port call in May at Port Angeles. The ms Veendam made one trip into Puget Sound to Todd Shipyard in May.

ms Amsterdam: Seattle, April 21 to October 3, 2004 Weekly
ms Oosterdam: Seattle, May 6 to September 18, 2004 Weekly
ms Veendam: Seattle, May 5, 2004 one call
ms Zaandam: Port Angeles, May 13, 2004 one call

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

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

- In compliance with Section 1.1.1 and 1.1.2, the ms Amsterdam held all treated and untreated gray and black water while in Washington waters. This vessel has a US Coast Guard Type II MSD. Based on a thorough review of ships' logs and records we certify that the ms Amsterdam complied with these provisions of the MOU. HAL will make these records available to Ecology upon request.

- In compliance with Section 1.1.3, HAL submitted information required to allow the discharge of treated wastewater one mile from a berth to Ecology on May 6, 2004 for the following ship(s): ms Oosterdam and ms Zaandam. Although no information

was submitted for the ms Veendam since it was going to drydock, it has an Advanced Waste Water Treatment System certified by the Coast Guard in 2004. With the exception of the incident involving the call of the ms Zaandam to Port Angeles described below, HAL certifies that these ships complied with the requirements of the MOU. HAL will make these records available to Ecology upon request.

Section 1.1.4 Discharge of Residual Solids. 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. HAL will make these records available to Ecology upon request. Solid waste was not offloaded from HAL vessels in Washington State in 2004.

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 2004.

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 18, 2004 HAL reported an incident on the ms Zaandam in Port Angeles. The report is attached.

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 (206) 281-0579.

Sincerely,

James W. Kross
Manager, Environmental Programs
Holland America Line