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December 14, 2009

Via Electronic Mail and U.S. Mail

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Re: *United States v. Ionia Management S.A.*
Index No. 07-cr-134 (JBA)
Response to Special Master's Letter, dated November 11, 2009
CO&D Ref: 500172.0002

Dear All:

We write on behalf of our client, Ionia Management S.A. (hereinafter "Ionia"), to submit Ionia's response to the Special Master's letter, dated November 11, 2009.

Should you have any questions regarding the enclosed report and attachments, please do not hesitate to contact us.

Sincerely yours,

CHALOS, O'CONNOR & DUFFY LLP

Michael G. Chalos

Enc.

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Report of Ionia's Progress – December, 2009

1) Status report on the ("SWOMS"). Issues to be addressed regarding the SWOMS include:

a) A report on operation of the SWOMS in the M/T THEO T and M/T FIDIAS, including a discussion of problems, malfunctions or system failures encountered so far, and efforts to address them;

The SWOMS continues to be fully functional onboard both vessels as reported to the Special Master during the hearing in July of 2009. Neither unit has been rendered inoperative at anytime throughout the period since their installation, electronic data has been transmitted on a daily basis from both vessels without the need for human intervention and in accordance with the requirements of the Special Master's Scope of Work.

As discussed during the hearing with the Special Master, the SWOMS software has been upgraded on both vessels in order to maintain data for fourteen days in the unit's memory in the event that there the vessel loses the ability to communicate with the shore – side offices.

Electronic data that is transmitted from the vessels to the company is monitored by the Technical Superintendent assigned to each vessel on a daily basis. At the end of each month, each vessel submits the following records in accordance with the requirements of the Special Master's Scope of Work:

a) Oil Record Book Part I entries;
b) Daily Tank Sounding Log;
c) Engine Room Alarm Printouts;

The responsible Technical Superintendent compares the submitted records with the data that has been transmitted by the vessel throughout the month and ensures that all records are accurate. In the event that any irregularities in the data are identified, an investigation immediately commenced and carried out in order to ascertain the cause(s) of the irregularity.

The following issues have been observed since the company's report to the Special Master during the hearing of July, 2009:

a) M/T FIDIAS:

The sensor in the vessel's Bilge Holding Tank is currently not functioning. As the vessel had been trading in West Africa, technicians were not able to attend the vessel in order to resolve the issue. On the 16th of November, 2009 the vessel called at Piraeus and Ashland technicians attended the vessel. However, they were not able to resolve the problem due to a failure of their equipment.

Due to the sensor's malfunction, the Technical Superintendent is unable to utilize the SWOMS data that is transmitted for the specific tank. In order to verify the accuracy of the entries that are made in the Oil Record Book Part I, the remaining data that is submitted by the vessel is reviewed and all necessary calculations are made in order to ensure to the best of the Technical Superintendent's ability that there are no apparent irregularities in the data that is completed by the vessel.
A further issue that has been encountered concerns the incinerator waste oil tank soundings that are recorded by the SWOMS. Due to the small dimensions (approximately 1,5m^3) of the tank and the frequent operations that are carried out such as transfers, draining and evaporation, the SWOMS is not able to accurately record the level of waste in this particular tank. As this issue is a result of the size and nature of the incinerator waste oil tank, a solution to ensure accurate recoding is not readily available.

b) M/T THEO T:

The sensor installed in the vessel's Bilge Holding Tank was not functioning properly. Technicians boarded the vessel in July, 2009 and corrected the malfunction. The sensor is now fully operational.
Minor discrepancies were found in soundings of the vessel's sludge tank by the SWOMS of approximately 2 – 7%. The technicians who boarded the vessel in July, 2009, were unable to resolve this particular minor discrepancy issue. However, the small percentage of the discrepancy is consistent with the normal operation of the vessel and the SWOMS inherent measuring error. The same issue with the incinerator waste oil tank mentioned above for the M/T FIDIAS has been encountered on this vessel as well.

Please find a log of actions regarding the installation, commissioning and operation of the SWOMS. Events occurring since the last Special Master's hearing in July, 2009 are highlighted in blue print.

	M/T THEO T	M/T FIDIAS
14.01.08	Specification reached and initial agreement was made	
05.02.08		Ashland Inspected the vessel to identify the installation and the systems requirements.
18.03.08		Purchase Order for the Envirologger Placed
18.04.08	Ashland Inspected the vessel to identify the installation and the systems requirements.	
23.04.08	Envirologger quotation received and Purchase Order was placed	
2.06.08		Order Ready – Waiting Shipping instructions
28.06.08		Shipped to Las Palmas
08.07.08		Envirologger reached Las Palmas
09.07.08	Envirologger Shipped to Singapore where the DryDocking will be taking place	
27.07.08	Envirologger Arrived at Singapore in the custody of the Agent	
19.08.08	Envirologger was installed.	
15.09.08	Ashland Technicians confirmed that the Envirologger is working satisfactorily however they were experiencing difficulties in calibrating the Rosemount Sounding Radars. Problem with interfacing the technician's Pc with the Sensors.	
24.09.08	Ionia arranged for Rosemount to liaise with Ashland in order to attempt hooking up the software to Rosemount Level Transmitters ashore in an effort to identify and resolve the fault.	
15.10.08	Emerson specialist boarded the vessel and identified that the sounding tables provided by the software do not match the actual sounding tables onboard. It was confirmed that the sounding of the Bilge Holding Tank was correct and fully functional.	

24.10.08	Vigilant amended Envirologger software which was installed onboard. The system was calibrated and commissioning was completed. The system is fully functional pending the electronic transfer of data directly from the envirologger to the company.	
02.01.09		Envirologger delivered onboard at Las Palmas
15.01.09	Vigilant suggested modification of Main Controller Board	
18.01.09		Envirologger was installed.
06.02.09	Main Controller Board was dispatched to the vessel.	
20.02.09	Ashland Technician attended the vessel at Singapore, installed the Main Controller Board, but attempts to connect Envirologger with vessel's network failed.	
06.03.09	VMS specialist agreed to attend the vessel at any port of Far East.	
11.03.09	Waiting for next convenient port	
13.03.09	IONIA IT department informed Vigilant after proper research that our onboard system communication system SkyFile, does not support the SMTP functionality that the Vigilant system requires, therefore visit of VMS specialist was canceled until he has the system checked. SkyFile program was sent to Vigilant for further tests	**Ashland Singapore reported inability to attend vessel at European port due to lack of SEGEN VISA of available technicians. They also reported that technicians without visa requirements are currently occupied.**
16.03.09	Vigilant reported SkyFile installation on their PCs promising further investigation and proper setup	
18.03.09	VMS reported that they are not able to ensure that the SWOMS system is compatible with Skyfile.	
30.03.09	Ionia purchased a new communication system RYDEX that VMS verified as compatible with Envirologger.	

31.03.09		**Ashland agreed to send technicians onboard to commission the system, joining the vessel at Aliaga, Turkey on 06-Apr-2009**
07.04.09		**Ashland representative along with company's superintendent joined the vessel.**
13.04.09		**Envirologger was successfully commissioned. Communication program RYDEX was installed and configured.**
14.04.09		Electronic transmission of data to the company's head office without human intervention was successfully succeeded
15.04.09		**System is being calibrated & configured.**
16.04.09	Since vessel is calling at Chinese port, the installation of RYDEX communication along with Ashland attendance will be carried out at Singapore on/or about 30th Apr-2009	**System reported fully operational, fulfilling SWOMS specification as ordered by the Court.**
02.05.09		**Noticed inability of the system to transmit regularly data due to network issues that resulted in the occasional loss of connection with the vessel's server.**
10.05.09	Ionia requested from Vigilant to upgrade the system to maintain data for at least two weeks in SWOMS memory in the event that the network malfunction results in inability of daily transmission.	
12.05.09	The "RYDEX" communications system was installed and the electronic transmission of data from the SWOMS to the company's offices without the need of human intervention was successfully achieved.	
17.05.09		Vessel's network was upgraded and the ability of the system to transmit data without human intervention was restored.

22.05.09	Vessel's SWOMS was successfully upgraded and sensors were recalibrated.	**Vessel is heading to West therefore upgrading of the SWOMS to maintain memory was scheduled for next convenient port.**
28-05-09		**Reported discrepancies between actual soundings and SWOMS readings.**
Jun -09	Reported discrepancies between actual sounding of waste oil tanks and SWOMS readings	
7-07-09	Ashland Marine attended the vessel and sensors were calibrated, however discrepancies have not been completely eliminated. Minor differences that do not affect system's reliability are sufficiently monitored by IONIA'S Technical department. Furthermore the SWOMS software was upgraded to maintain electronic data stored in its memory for a period of at least 14 day	
16-11-09		**Ashland Technicians boarded the vessel at Piraeus, however technicians were not able to complete attendance as their equipment failed.**
Dec-09	Until now the system is working properly and efficiently and the electronic transmission of data takes places on a daily basis without the need for human intervention.	With the exception of the reported discrepancies the system is working properly and efficiently and the electronic transmission of data takes places on a daily basis without the need for human intervention.

Table 1 Log of Actions Concerning Installation, Commissioning and Maintenance of SWOMS

Please see Appendix I and Appendix II - SWOMS Technician Reports

b) A comparison of the performance of the SWOMS onboard the M/T THEO T and M/T FIDIAS;

M/T THEO T	M/T FIDIAS
Initial difficulties experienced with the system were due to subcontractors' inability to obtain consistent sensor calibration.	Initial delay of system installation due to vessel's trading pattern as well as initial delay of system commissioning due to lack of availability of Ashland technicians.
After successful calibration of sensors and commissioning of the system, SWOMS initially did not transmit data to IONIA's head office without the need for human intervention.	Although the communication system had been changed, the unit was unable to transmit data on a daily basis due to network malfunction. This was rectified with the renewal of the main server.
It was established that the SWOMS software was incompatible with the existing communication software onboard the covered vessels. A compatible communication system was purchased and installed onboard. The SWOMS can transmit data without the need for human intervention.	Since renewing of main server the transmission of data without the need of human intervention to head office has now been successfully accomplished on a daily basis.
Ashland Marine attended the vessel and sensors were calibrated, however discrepancies have not been totally eliminated. Unimportant differences that do not affect system's reliability are properly managed by IONIA'S Technical department.	Some discrepancies were observed in the quantities of tank soundings and timings in comparison to other shipboard waste management records. The exact quantities were not always consistent with the actual tank soundings. When the tanks were low the discrepancies were not as significant as when they were high.
	Delays of sensors' recalibration due to vessel's trading pattern. Discrepancies are properly managed and monitored by IONIA'S tech. department.

Table 2 Comparison of Performance of SWOMS onboard M/T FIDIAS and M/T THEO T

c) Report of any discrepancies found between SWOMS data and other shipboard waste management records, and any actions taken by Ionia to address the discrepancies;

The records transmitted by the SWOMS provides data to the company's Technical department in order for comparison to be made of the following:

a) Tank soundings of all tanks used to store waste generated in the vessels' engine room.
b) The operation of the vessels' oily water separator and oil content meter.
c) The operation of the vessels' incinerator.

The comparison of data transmitted by the SWOMS with the records submitted by the vessels has resulted in the following conclusions:

a) Discrepancies have been identified between the readings of tank soundings recorded by the SWOMS and the actual soundings carried out by shipboard personnel.
b) No discrepancies have been identified when comparing the operation of the OWS and OCM as per SWOMS data with the entries in the Oil Record Book Part I and the engine room alarm print outs.
c) No discrepancies have been identified when comparing the operation of the incinerator with entries in the Oil Record Book Part I and the engine room alarm print outs.

The below graphs have been prepared in order to analyze the discrepancies between the readings recorded by the SWOMS and the actual soundings carried out by the vessel's personnel.

The graphs illustrate the daily tank soundings in cubic metres of the following tanks recorded manually and by the SWOMS on both vessels during the months of July, August and September:

- Bilge holding tank
- Sludge tank
- Bilge Oil Tank
- Waste Oil Tank

The blue columns indicate the readings recorded by the SWOMS while the pink columns indicate the manual sounding recorded by the shipboard personnel.

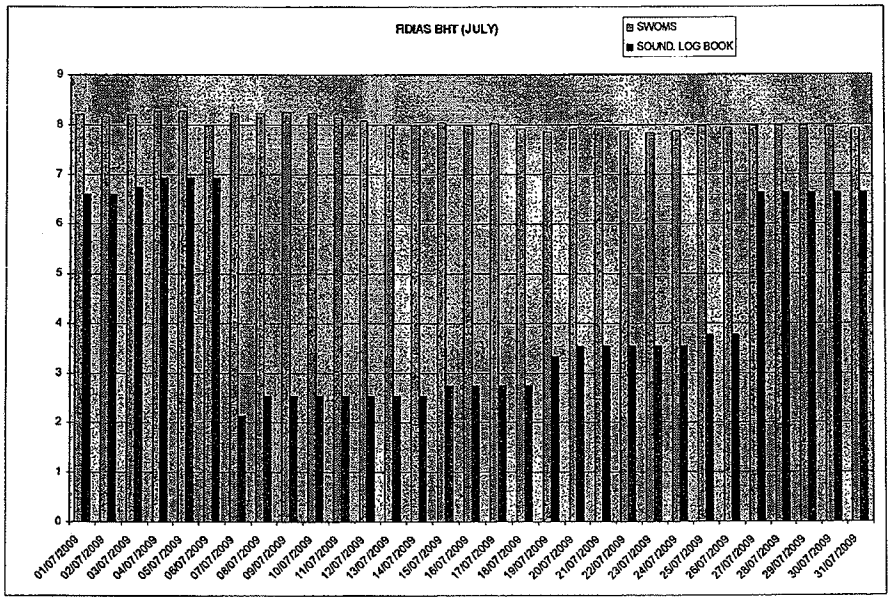

Figure 1 M/T FIDIAS – Bilge Holding Tank – July 2009

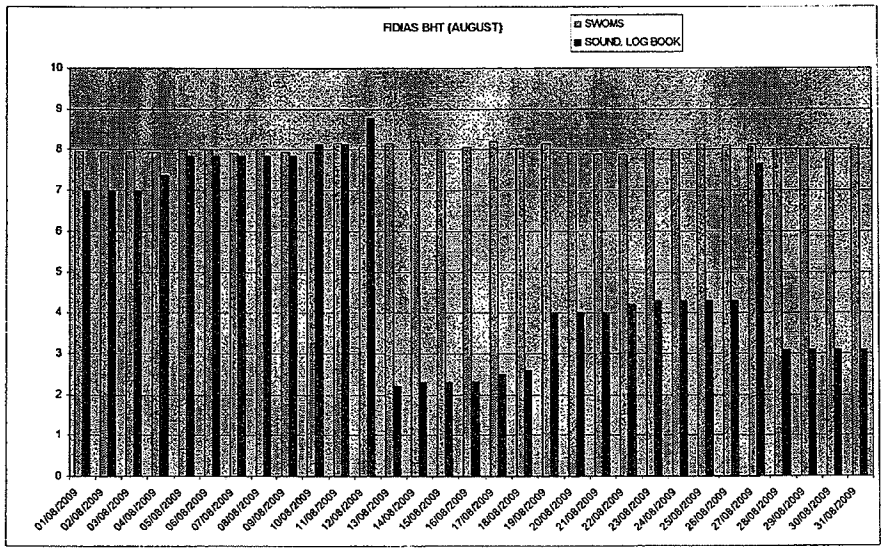

Figure 2 M/T FIDIAS – Bilge Holding Tank – August 2009

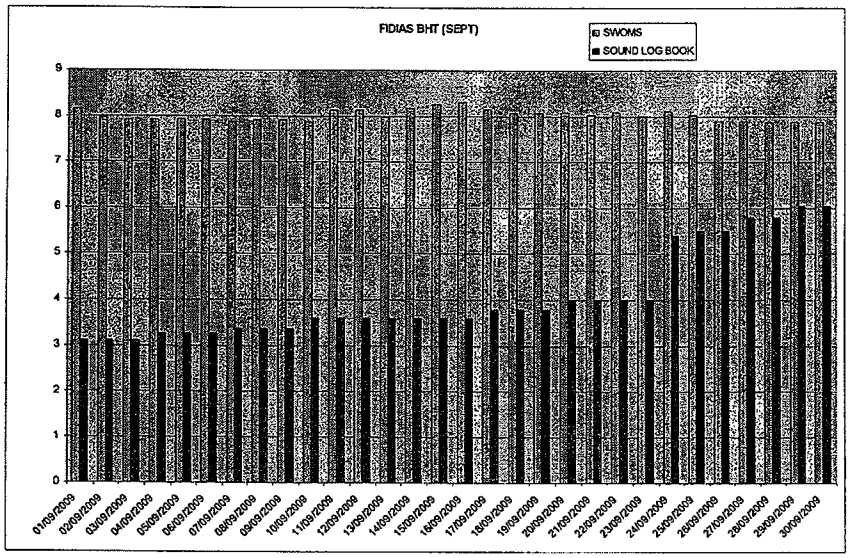

Figure 3 M/T FIDIAS – Bilge Holding Tank – September 2009

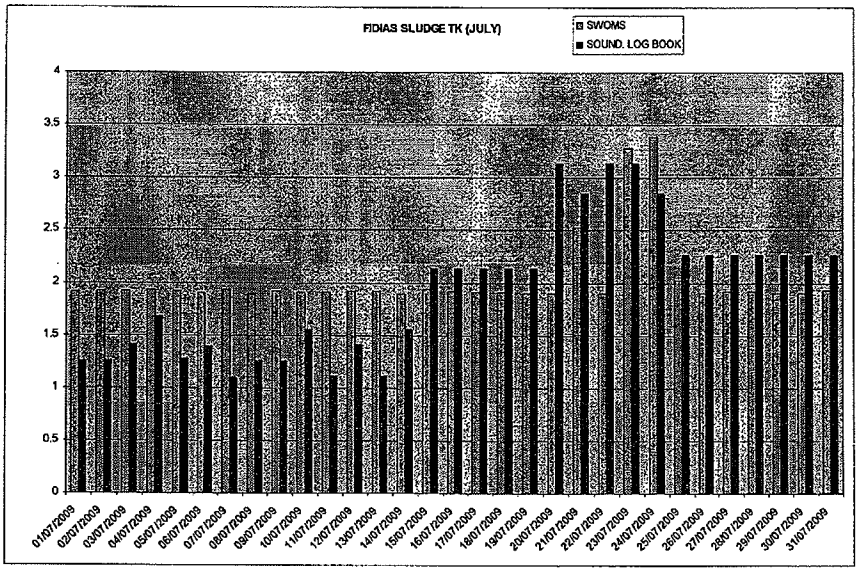

Figure 4 M/T FIDIAS – Sludge Tank – July 2009

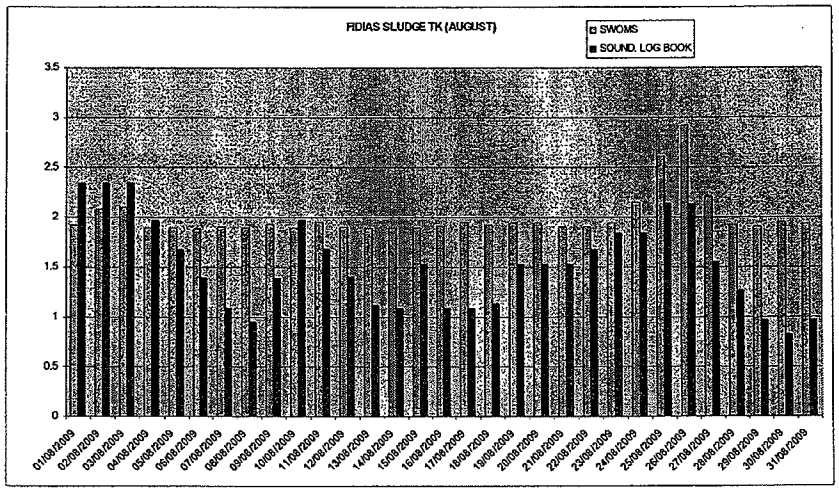

Figure 5 M/T FIDIAS – Sludge Tank – August 2009

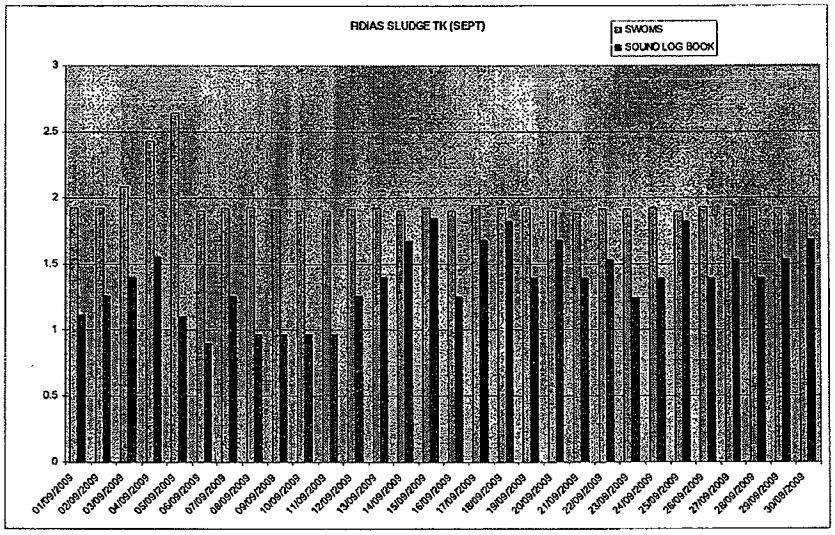

Figure 6 M/T FIDIAS – Sludge Tank – September 2009

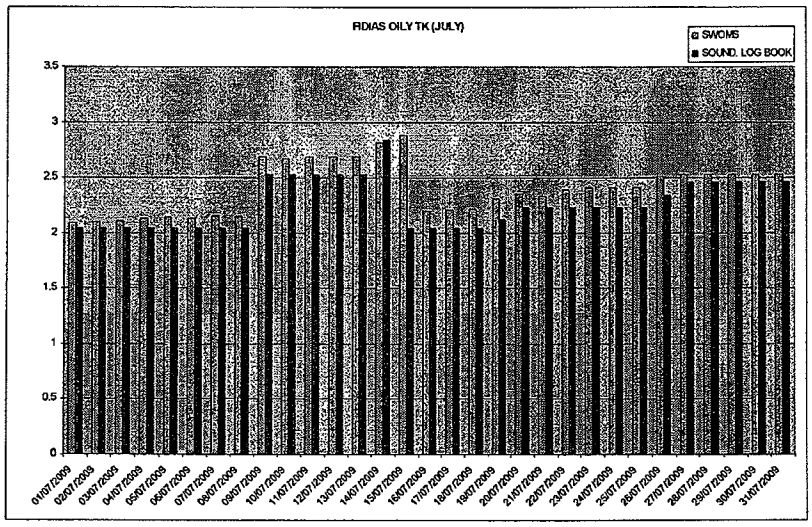

Figure 7 M/T FIDIAS – Oily Bilge Tank – July 2009

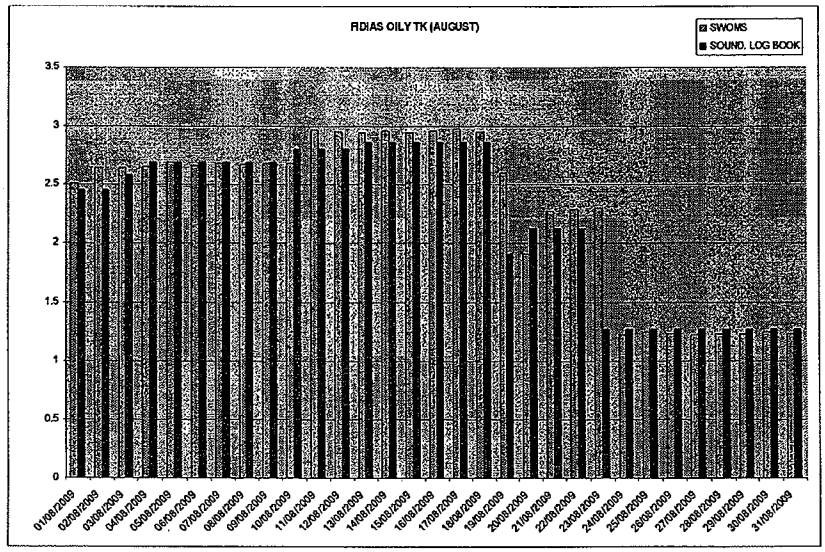

Figure 8 M/T FIDIAS – Oily Bilge Tank – August 2009

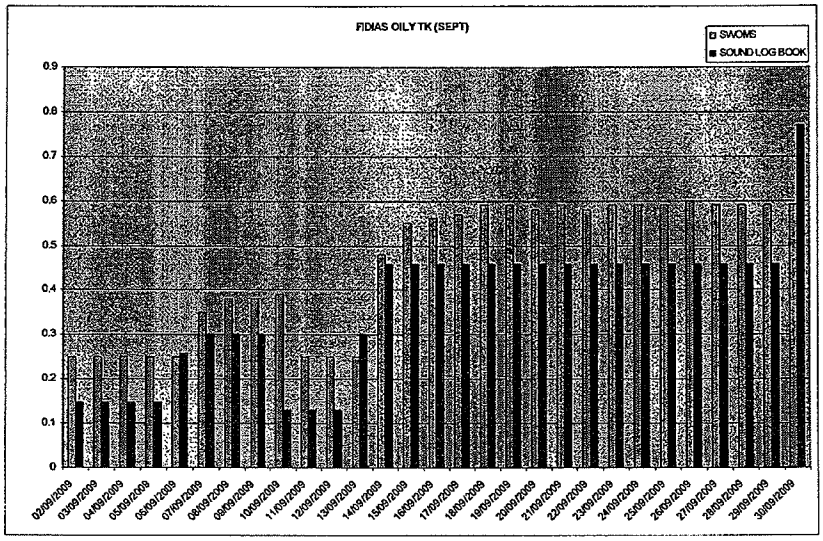

Figure 9 M/T FIDIAS – Oily Bilge Tank – September 2009

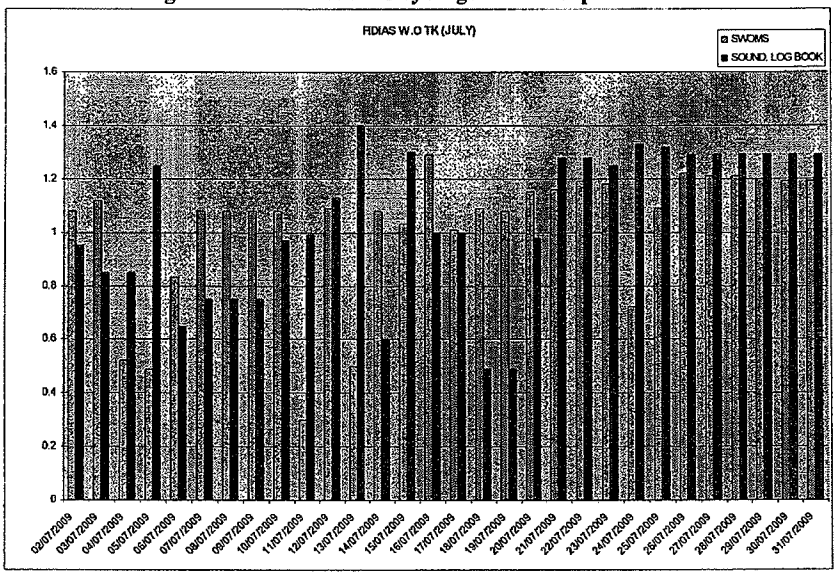

Figure 10 M/T FIDIAS – Incinerator Waste Oil Tank – July 2009

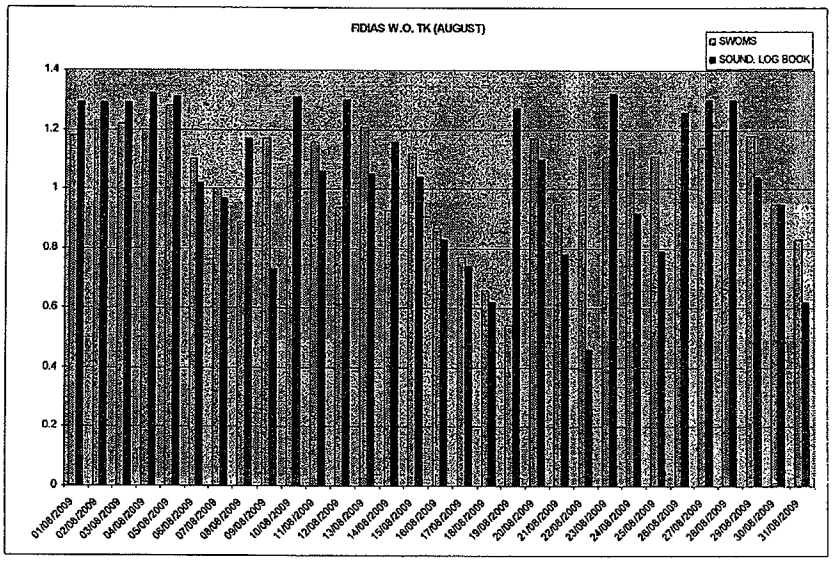

Figure 11 M/T FIDIAS – Incinerator Waste Oil Tank – August 2009

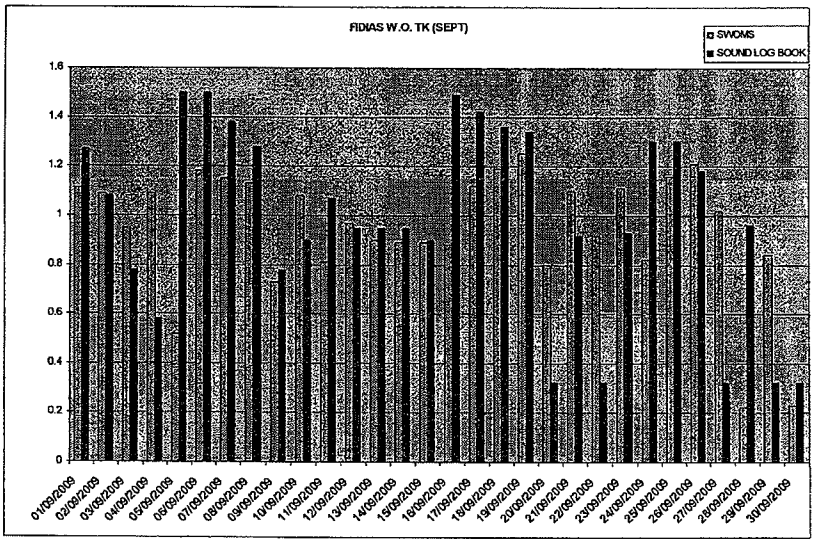

Figure 12 M/T FIDIAS – Incinerator Waste Oil Tank – September 2009

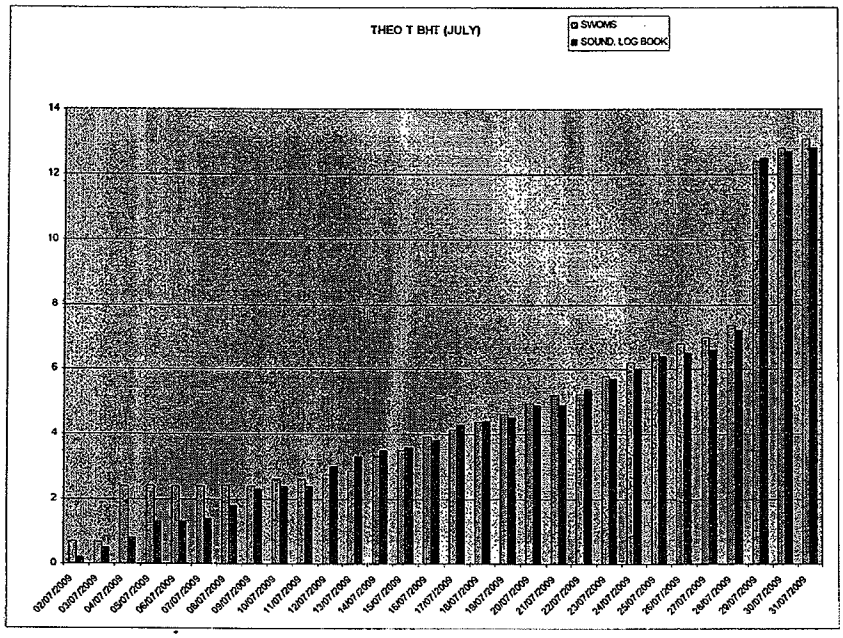

Figure 13 M/T THEO T – Bilge Holding Tank – July 2009

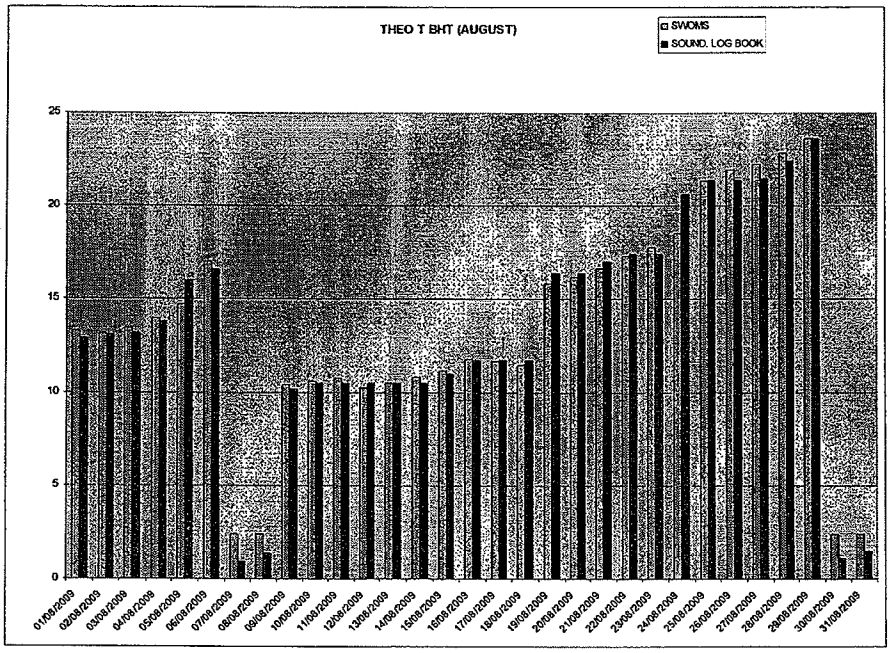

Figure 14 M/T THEO T – Bilge Holding Tank – August 2009

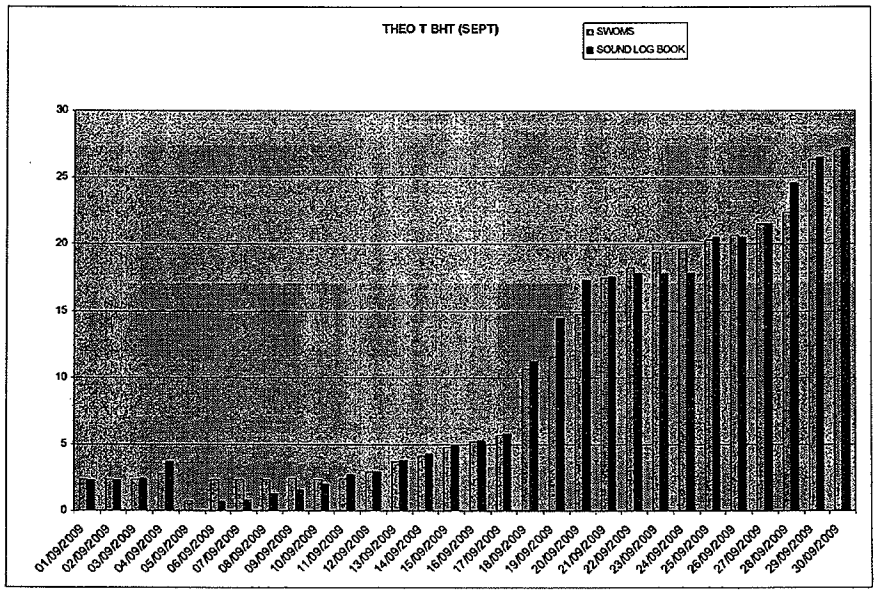

Figure 15 M/T THEO T – Bilge Holding Tank – September 2009

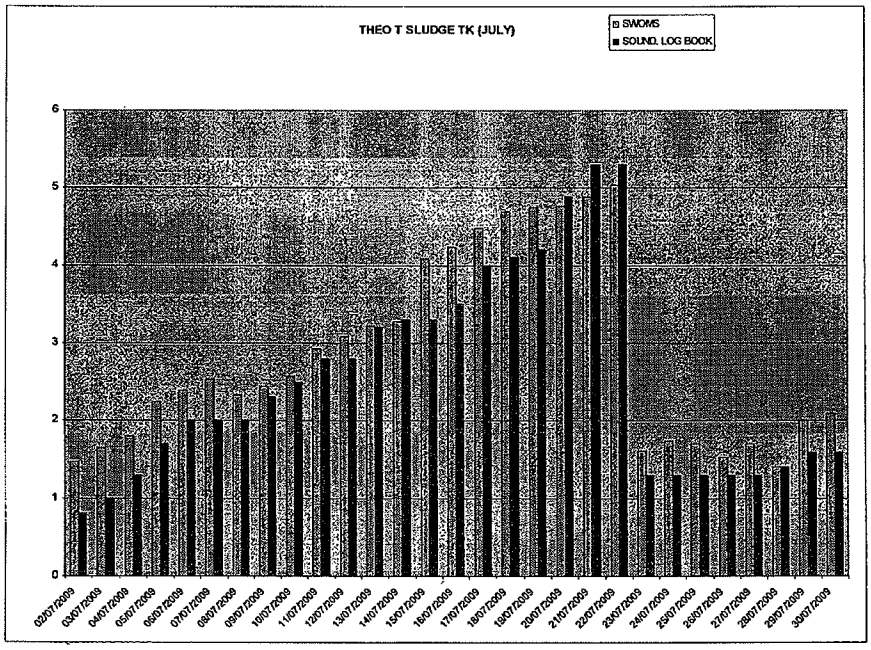

Figure 16 M/T THEO T – Sludge Tank – July 2009

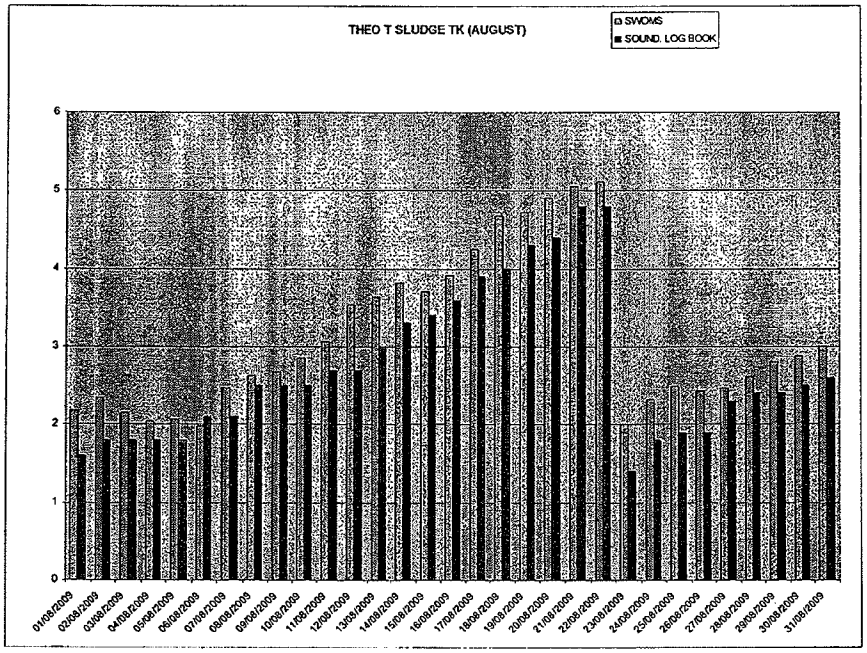

Figure 17 M/T THEO T – Sludge Tank – August 2009

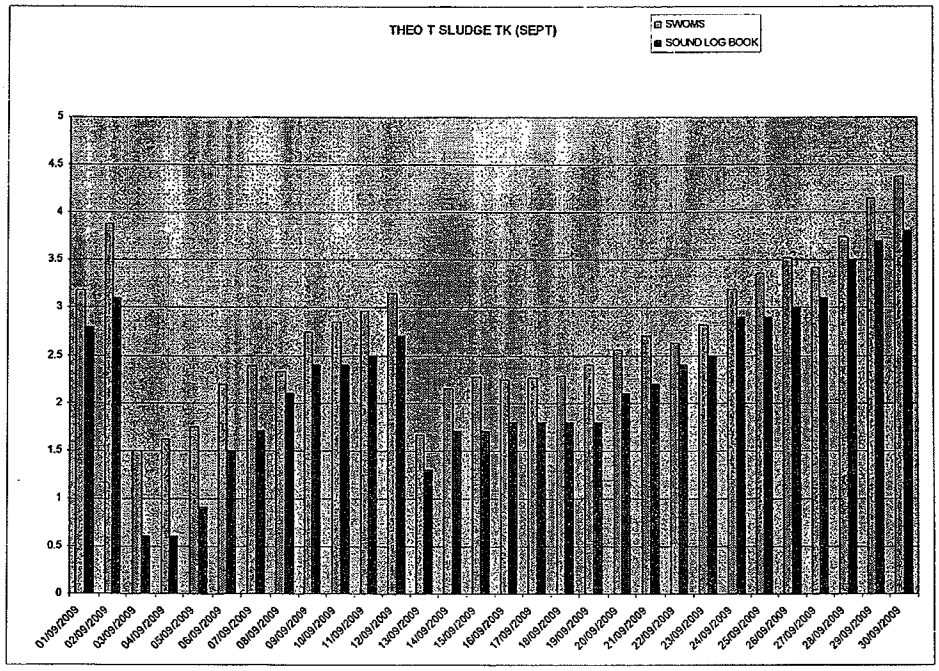

Figure 18 M/T THEO T – Sludge Tank – September 2009

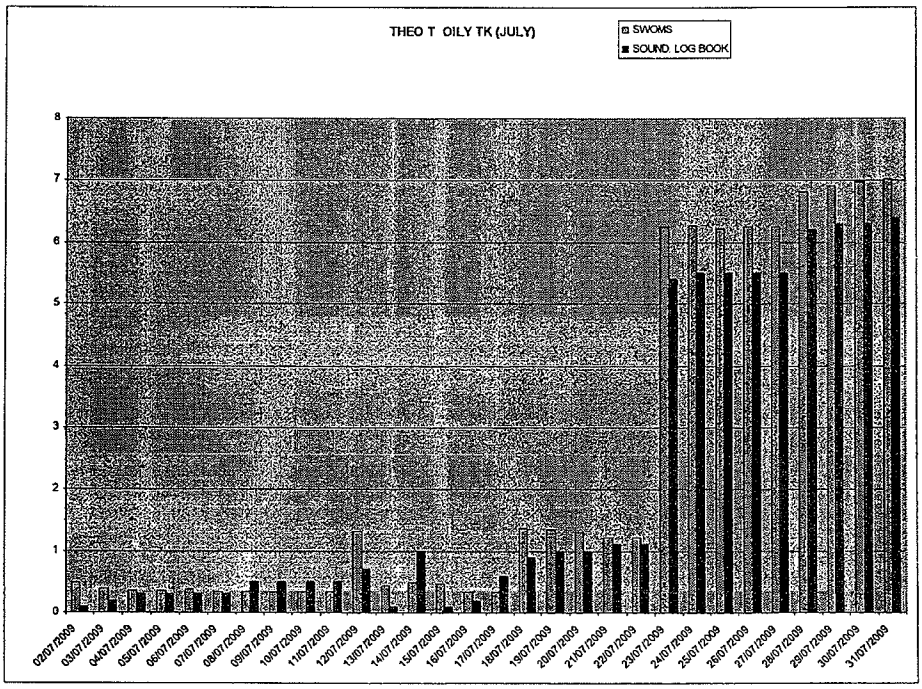

Figure 19 M/T THEO T – Oily Bilge Tank – July 2009

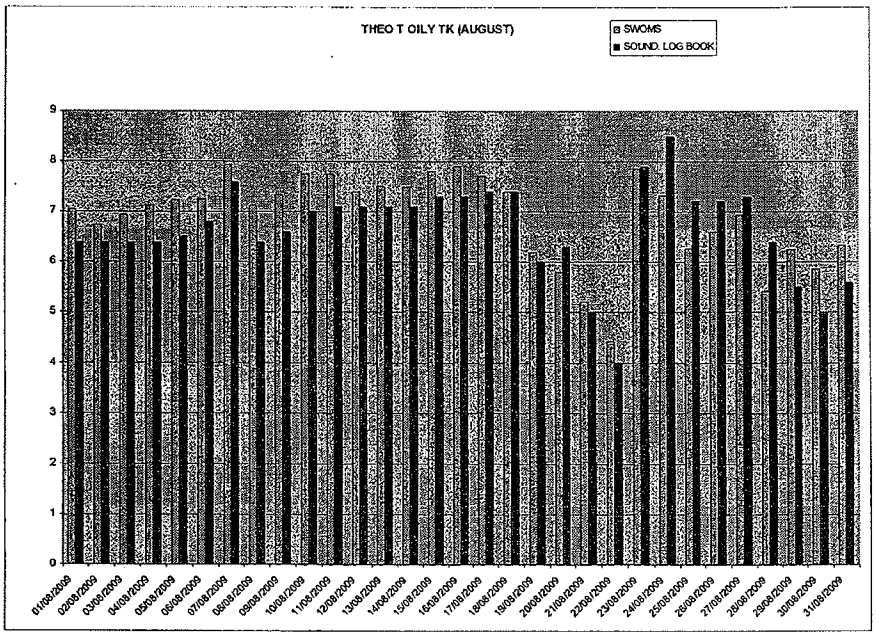

Figure 20 M/T THEO T – Bilge Oily Tank – August 2009

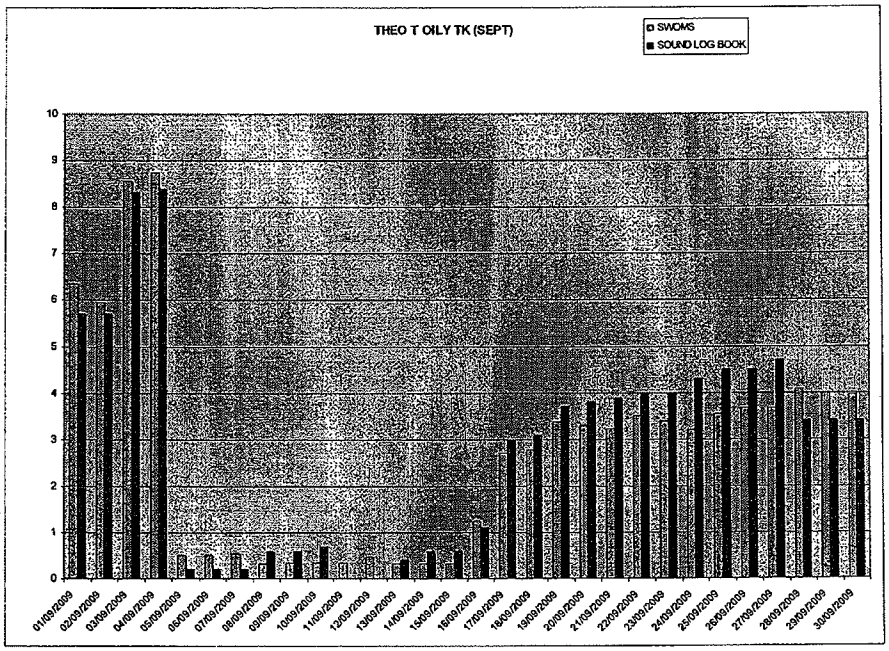

Figure 21 M/T THEO T – Bilge Oily Tank – September 2009

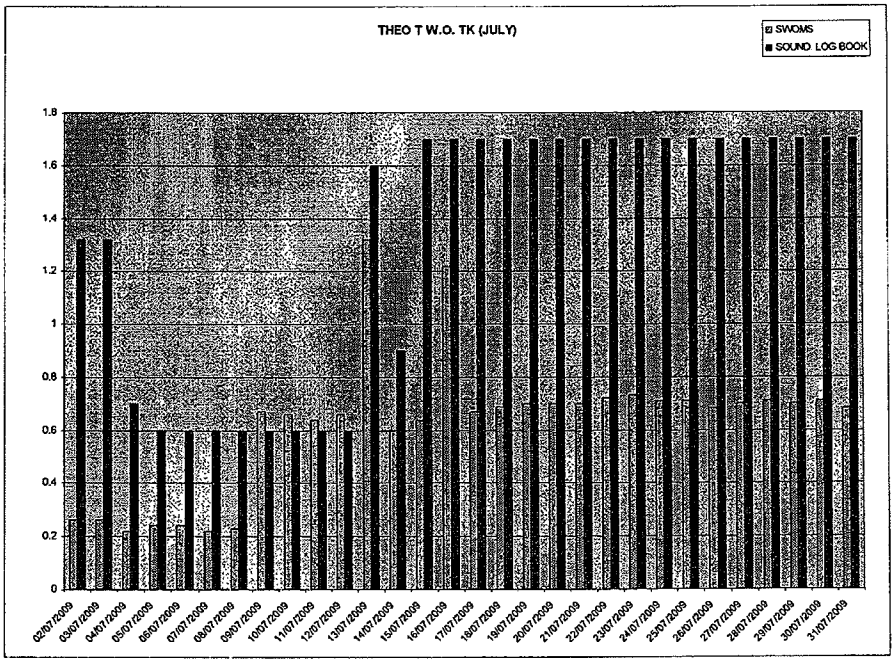

Figure 22 M/T THEO T – Waste Oil Incinerator Tank – July 2009

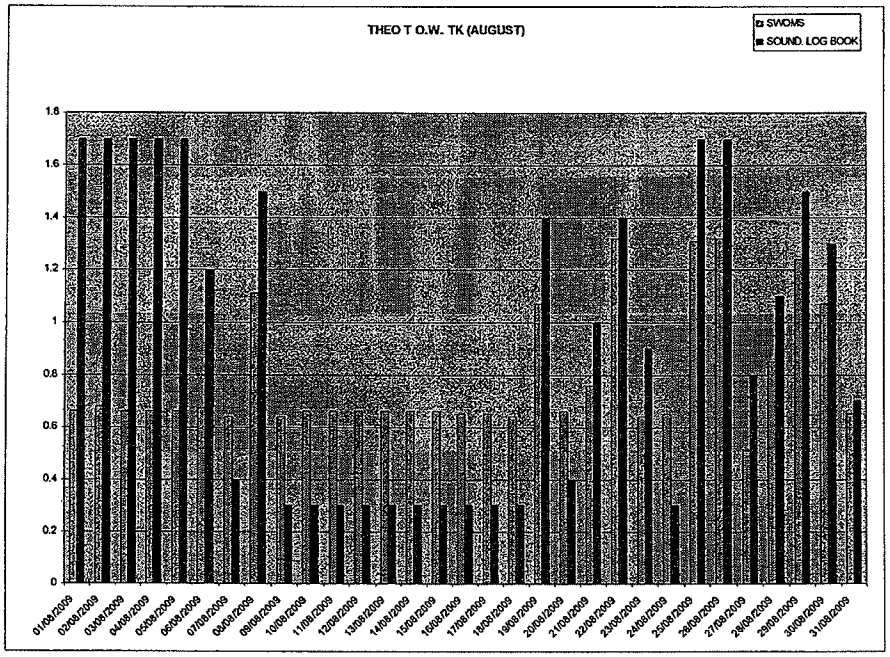

Figure 23 M/T THEO T – Waste Oil Incinerator Tank – August 2009

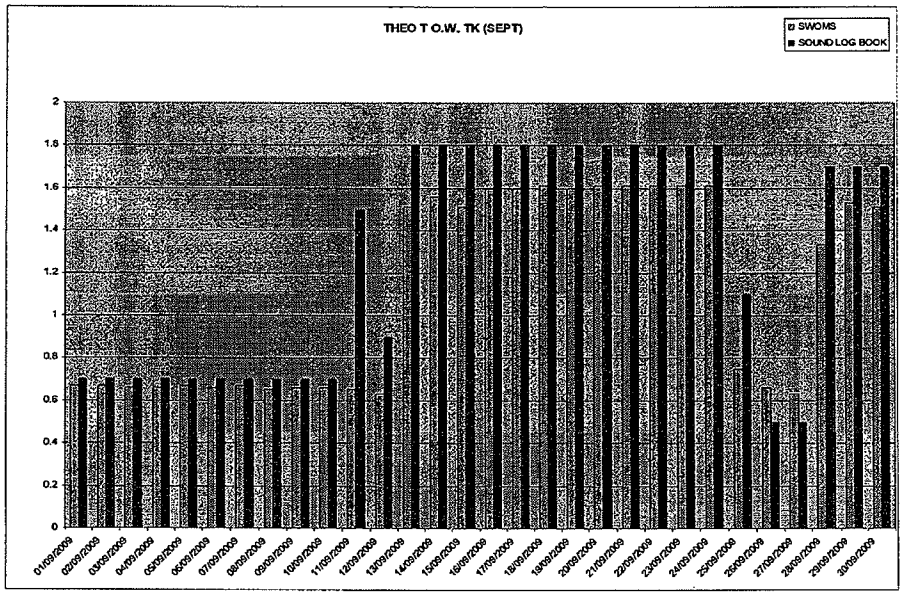

Figure 24 M/T THEO T – Waste Oil Incinerator Tank – September 2009

Upon analysis of the discrepancies identified when reviewing the data concerning tank soundings, it was concluded that there are five categories of discrepancies:

i) Discrepancies in readings that are attributed to the difference in times at when the soundings are carried out. The SWOMS records the tank levels at 00:00 GMT whereas the manual soundings are carried out during watch standing hours. During the period between the recording of the readings, transfers may have occurred resulting in the differences in recorded quantities. Please see, Figures 16, 17, 18, 19, 20 and 21.
ii) Discrepancies that indicate that the sensor in the specific tank is not functioning. Please see Figures 1, 2 and 3.
iii) Consistent discrepancies attributed to incorrect calibration of the SWOMS sensor that however allows the tank sounding level recorded to be monitored adequately. Please see Figures 4, 5, 6 and 9.
iv) Discrepancies between the readings recorded by the SWOMS of the incinerator's waste oil tank and the actual soundings that are carried out manually. Please see Figures 10, 11, 12, 22, 23 and 24.
v) Minor discrepancies within the allowable limit of 5% as per the unit's manufacturer. Please see Figures 7, 8, 13, 14, and 15.

In the event that Type (i) discrepancies are identified, the responsible Technical Superintendent cross checks that the manual soundings of the tank in question are within the maximum and minimum readings recorded by the SWOMS. Furthermore, all transfers and incinerator/OWS operations are reviewed and it is verified that all calculations are accurate. To date, all calculations appear to be in order.

When discrepancies indicate that a tank's sensor has been rendered inoperative, arrangements are made for specialized technicians to attend the vessel in order to resolve the issue at the first convenient opportunity. The responsible Technical Superintendent ensures that all entries in the Oil Record Book Part I are accurate and in accordance with tank sounding entries and the engine room alarm print outs.

The discrepancies that have been identified regarding the readings of the waste oil incinerator tank have been investigated and are attributed to the following factors:

a) The nature of the incinerator waste oil tank results in a number of operations such as transfers, draining and evaporation to be carried out within a 24 hour period. The SWOMS does not have the ability to take these operations into account resulting in inaccurate readings.
b) The tank is small resulting in inaccurate readings.

Technicians have boarded the vessels to resolve the issue, however results have not been satisfactory and discrepancies continue to be observed.

Minor discrepancies that are within the unit's allowable limit are considered acceptable and are not investigated.

d) The costs Ionia has incurred in installing, calibrating and maintaining the SWOMS;

SWOMS Costs Incurred					
	Purchasing	Installing	Commisioning	Maintaining Annually*	Follow up & Comparison
THEO T	**$30,115.00**	**$14,000.00**	**$12,037.00**	**$5,000.00**	**$8,100.00**
FIDIAS	**$32,869.00**	**$12,000.00**	**$18,175.00**	**$5,000.00**	**$4,725.00**
Total	**$62,984.00**	**$26,000.00**	**$30,212.00**	**$10,000.00**	**$12,825.00**
			Total Cost		**$142,021.00**

* Estimated

Table 3 Costs Incurred Concerning Installation and Maintenance of SWOMS

The costs of maintenance are approximate estimations as the attendance of technicians is required and the relevant expenses shall depend on the vessel's area of trade at the time of attendance.

The expenses attributed to the follow up and comparison of records is based on the average time expended by the responsible Technical Superintendent in reviewing the submitted records.

2. M/T FIDIAS and M/T THEO T trading schedules. In light of Ionia's previous request to allow the M/T FIDIAS and M/T THEO T to trade in U.S. ports by those vessels

Currently there is no indication that the covered vessels shall be calling at a U.S. port in the near future.

3. Pollution incident, 17 September, 2009 at Antwerp. The issues from the Antwerp incident to be addressed include:

a) Report of company's investigation into the incident including any conclusion as to root causes;

Description of Incident

The M/T KRITON, a double sided, single bottom oil tanker built in 1991, completed her scheduled dry-docking repairs at Gibraltar on the 10th of September, 2009. The vessel sailed from Gibraltar following completion of the previously mentioned inspection and repairs on the 11th of September, 2009 in order to load a cargo at Antwerp.

On the evening of the 16th of September, 2009, the vessel arrived at Antwerp. The vessel was scheduled to take bunkers at a lay berth in Antwerp prior to going alongside for loading operations. In accordance with Paris MOU regulations, maritime authorities in Antwerp had been invited to attend the vessel in order to carry out an expanded Port State Control inspection. The Port State Control inspection was scheduled to take place while the vessel was taking bunkers.

The vessel moored at lay berth 245, Noordnatie for bunkering operations on the morning of the 17th of September, 2009.

Bunkering operations commenced taking into account all safety measures as per company's procedures and industry guidelines.

At 08:30 LT, the 3rd Officer observed oil in the dock water on the starboard side of the vessel between the dock and the vessel. The gangway watch notified the Chief Officer who immediately sounded the alarm. Bunkering operations were immediately terminated and the oil pollution response team was activated.

The oil pollution response team placed booms around the fore and aft of the vessel in order to contain the oil sheen.

The Master notified the company's Operations department and the vessel's agents. The local authorities were notified immediately as well as the vessel's Flag Administration and the vessel's Classification Society.

It was verified that fuel oil was leaking from the Oil Discharge Monitoring Equipment (ODME) discharge pipe's overboard that passes through the vessel's fuel oil tank.

In order to ensure no additional oil was discharged outside the vessel, the Chief Officer began to transfer ballast from the vessel's starboard side to the port side, while the Chief Engineer began transferring fuel oil from the starboard fuel oil tank to the port fuel oil tank.

The vessel's agents arranged for a clean – up service provider to attend the vessel and assist in clean – up operations.

Port State Control Officers boarded the vessel in order to carry out an investigation of the incident and the vessel was consequently detained until the cause of the pollution was verified and eliminated. The vessel was released following the repair of the ODME discharge pipe to the satisfaction of the vessel's Classification Society on the 24th of September, 2009.

As a result of the pollution incident, a fine of €1000 was imposed by the Port State Control Authorities in Antwerp which has been paid in full by Ionia.

Vessel Particulars

Name:	M/T KRITON
Call Sign:	C6IF5
Flag:	BAHAMAS
IMO No:	8904264
Loa:	184,74m
Draft:	12,106m
Deadweight:	44,999mt

Location of Incident

Berth 245, Noordnatie, Antwerp, Belgium

Weather Conditions

Wind:	North East, 3 knots
Sea:	Slight sea
Current:	Southerly
Visibility:	Good

Time Line of Events (UTC)

17-Sep-2009	06:30	Gangway watch observed oil leakage. C/O informed, alarm sounded and oil pollution response team activated. Bunkering terminal notified.
17-Sep-2009	06:45	Operations Manager notified by Master.
17-Sep-2009	06:45	Vessel's agents notified
17-Sep-2009	06:53	Classification Society notified.
17-Sep-2009	07:10	Boarding of PSC Inspectors
17-Sep-2009	07:12	P&I Club notified.
17-Sep-2009	07:36	BOS Clean – Up Service Club notified.
17-Sep-2009	07:45	Departure of Operations Manager and Technical Manager for Antwerp
17-Sep-2009	08:00	BOS clean – up service arrived on – site.
17-Sep-2009	08:05	Boarding of P&I Club and Classification Society surveyor
17-Sep-2009	08:05	Notification of MTI
17-Sep-2009	11:38	Departure of PSC Inspectors – Vessel detained
17-Sep-2009	12:00	Departure of Classification Society surveyor
17-Sep-2009	18:00	Arrival of Operations Manager and Technical Manager onboard
17-Sep-2009	08:05	Notification of MTI
18-Sep-2009	03:00	Completion of clean – up
18-Sep-2009	10:00	Completion of debunkering
24-Sep-2009		Vessel released and sailed from Antwerp

Personnel Involved

Master: Nikolaos Tsolakos
Nationality: Greek
Age: 62
Experience: 39 yrs

Chief Officer: Donguines Allan Roy
Nationality: Filipino
Age: 34 yrs
Experience: 12 yrs

3rd Officer: Aspilla Simeon
Nationality: Filipino
Age: 46 yrs
Experience: 7 yrs

Chief Engineer: Theologitis Michail
Nationality: Greek
Age: 57yrs
Experience: 38 yrs

2nd Engineer: Zolina Johnito
Nationality: Filipino
Age: 49 yrs
Experience: 13 yrs

Cause of spill

It was verified that the ODME discharge pipe that passes through the vessel's starboard fuel oil tank became holed, allowing fuel oil to pass through the ODME overboard into the dock water. Approximately 1,0m^3 of fuel oil spilled into the dock water.

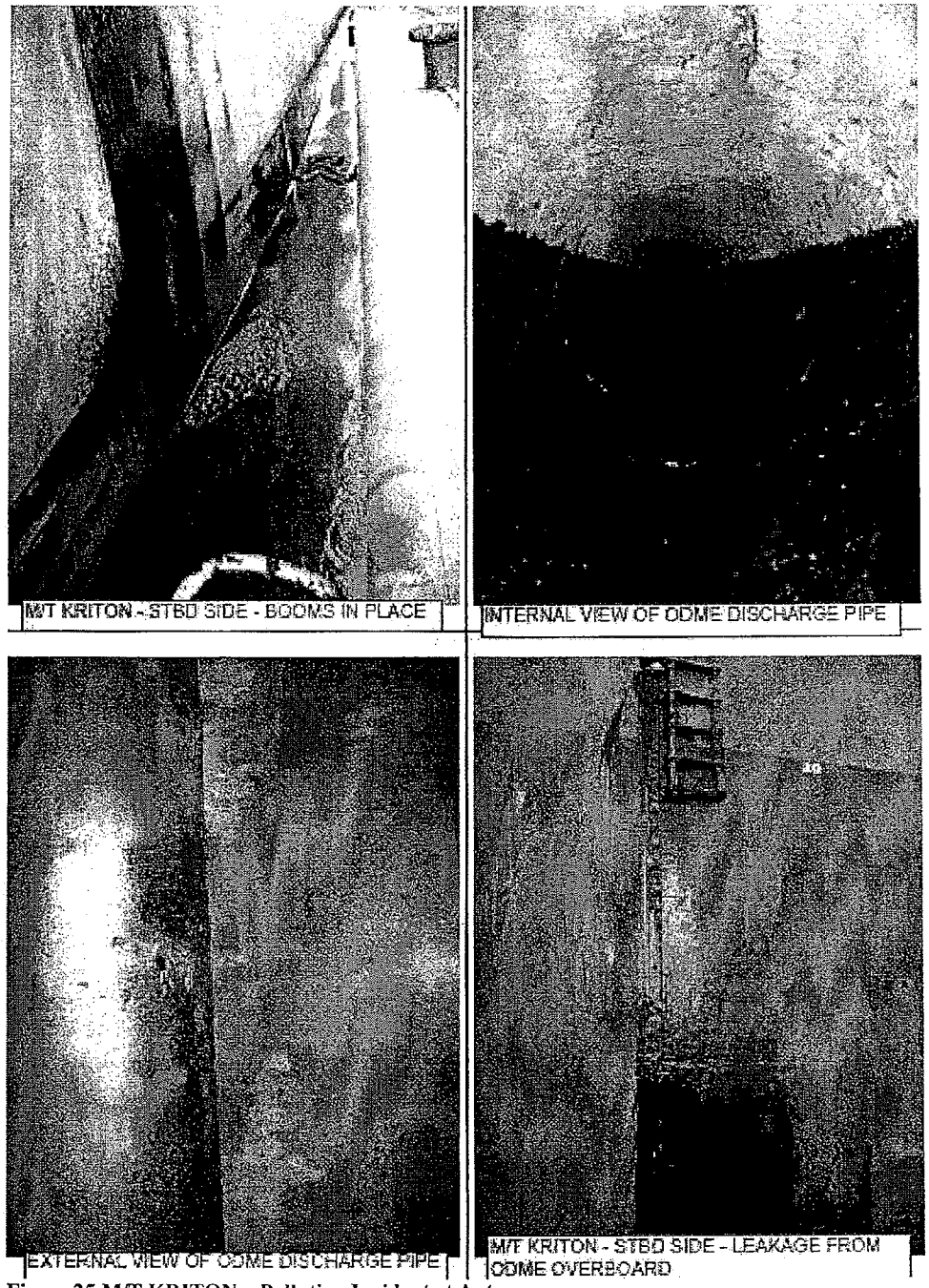

Figure 25 M/T KRITON – Pollution Incident at Antwerp

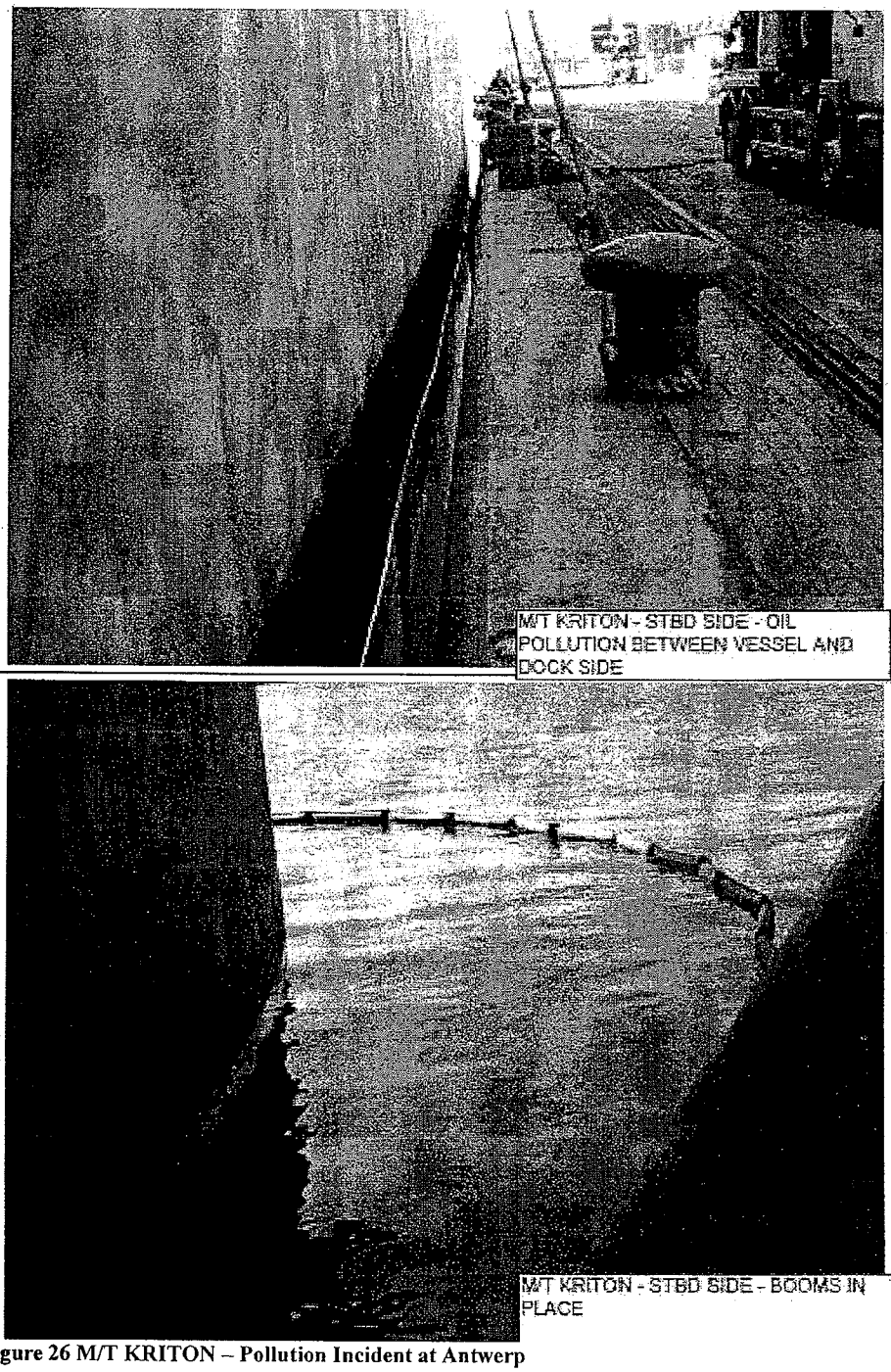

Figure 26 M/T KRITON – Pollution Incident at Antwerp