

APPENDIX A

PART 5 OF 6

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1 In addition to MARPOL. Section 10.9
2 is the process regarding the procedures
3 for noncrew members. We have posted a
4 notice at the gangway.

5 The Fleet Engineering survey has been
6 amended, as we've already discussed. The
7 environmental internal audit checklist has
8 been revised order to include all the
9 amendments that we have made to the
10 environmental management plan, and to
11 include the implementation of the VGB
12 because we had to include that to the
13 order checklist.

14 And then, we have to ensure that it
15 was properly implemented. So we now have
16 that on line.

17 The declaration of environmental
18 compliance upon sign up was originally
19 required to be signed by officers only.

20 Now all crew members have to sign it.
21 That's it. Those are all the amendments
22 so far.

23 So that's the end of --

24 MR. BUNDY: Any questions or comments
25 on that section?

1 MR. CHALOS: I have one, Mr. Bundy.

2 Ms. Tsochlas, when you spoke about
3 changing your instructions regarding oil
4 record book Part 1, you are talking about
5 the engine oil book.

6 Right?

7 MS. TSOCHLAS: Yes.

8 MR. CHALOS: And Part 2, you're
9 talking about that oil record.

10 Right?

11 MS. TSOCHLAS: Yes, sir.

12 MR. CHALOS: So you've changed -- or
13 you've issued additional instructions on
14 how to best fill those out?

15 MS. TSOCHLAS: Yes. MARPOL provides
16 instructions on what entries are to be
17 included in the oil record book.

18 The company has developed its own
19 requirements for additional entries that
20 we wish, which are in line with the scope
21 of work and recommendations made by
22 Captain Wigger.

23 Originally, we have instructions for
24 the oil record book Part 1 only. Now
25 we've included additional instructions for

1 Part 2 as well.

2 MR. BUNDY: Okay. Very well.

3 MS. TSOCHLAS: So Item 7 is the
4 ongoing audit of the M/T Theo T. Here we
5 focused on the items number included in
6 the addenda that you prepared, Mr. Bundy.

7 The first item was for the procedure
8 for crew members to report anonymously
9 environmental concerns.

10 We have three ways of anonymous
11 reporting. Crew members can send an
12 anonymous e-mail to our crew member who
13 immediately notifies the DPA or the CCM,
14 Mr. Karagiorgis.

15 They can send a letter by crew mail
16 to the attention of the DPA or CCM. Or
17 they can make an anonymous call to a
18 24-hour toll free number. The call is
19 directed to the company's CCM. Or in his
20 absence, to the company's DPA.

21 We have included that the procedure
22 for anonymous reporting in the pamphlet be
23 developed regarding code of ethics, which
24 we provide onboard our vessels.

25 Our seafarers are informed of the

1 procedure during their prejoining
2 familiarization process and the procedure
3 has been included in the environmental
4 management plan.

5 We've also developed posters,
6 prepared posters that we posted around the
7 vessel.

8 And we have an example here,
9 explaining the ways that anonymous
10 reporting can be carried out. And
11 demonstrating and showing the e-mail and
12 the toll free numbers that they can call.

13 Item B was regarding the oil record
14 notations concerning weekly retentions for
15 the fuel overflow draining tank and the
16 scavenger air box drain tank.

17 As I explained, the Form B has
18 recently been amended based on the ongoing
19 audit that was carried out, approximately
20 nine days before.

21 And the chief engineer neglected on
22 that first week when we were supposed to
23 record the retention onboard of sludges,
24 neglected to include those two tanks.

25 So this issue has been resolved. And

1 I have an example of an oil record book
2 entry here. If you go down a little bit.

3 Here are the weekly retentions and
4 you can see that has the sludge tank, the
5 bilge oil tank, the main engine scavenger
6 drain tank, which is one of the tanks we
7 were missing, the incinerator waste oil
8 tank and the fuel oil overflow tank, which
9 is another tanks we were missing. So this
10 issue has been resolved.

11 Item C was regarding procedures for
12 the regular testing for the oily water
13 separator and crew knowledge of testing
14 procedures.

15 And the test -- the oily water
16 separator, oily content, was being tested
17 on a monthly basis as required by our
18 company's environmental management plan.
19 And those tests were being recorded in the
20 oil record book.

21 However, it was not the full
22 operational test as requested by Captain
23 Wigger during his audit.

24 So we have revised our instructions
25 and provided, as I said earlier, a

1 specific fluid in order for the full
2 operational test to be carried out on a
3 monthly basis. And here we have the
4 revised instructions.

5 So if we go down a little bit you can
6 see we have the test fluid instructions
7 with a table for the dilution of that
8 fluid to get the right mixture. Okay.

9 Item D was regarding the maintenance
10 procedures for the oily water separator
11 and the sewage treatment plans.

12 And the technical department reviewed
13 the electronic planning system and has
14 verified that the maintenance tasks that
15 were missing from the electronic plan
16 maintenance system have -- regarding the
17 oily water separator and the sewage
18 treatment plant have been included.

19 And here's a screen shot from that,
20 which doesn't show very well here. But in
21 that screen shot you can see that the
22 sewage system has been included.

23 And on the next page, the oily water
24 separator maintenance instructions. So
25 that's in the link.

1 So that's the end of Item 7.

2 MR. BUNDY: Okay. Any questions from
3 the parties?

4 MR. BROWN: None from the government.

5 MR. BUNDY: No. Okay. Okay. Thank
6 you.

7 Move on to No. 8.

8 MS. TSOCHLAS: Eight is -- concerns
9 the incident that we have in Antwerp. We
10 had established some corrective,
11 preventive actions following that
12 incident.

13 The first one was that the technical
14 manager will provide instructions to the
15 vessel and requiring that the port fuel
16 tank, the other tank, not the tank that
17 caused the problem, should be thoroughly
18 inspected at the first convenient
19 opportunity.

20 The instructions have been provided
21 to the vessel. The inspection hasn't yet
22 been carried out because the vessel has
23 been training in West Africa and that fuel
24 tank has to be emptied in order for them
25 to be able to access it. So the

1 opportunity hasn't arisen as of yet.

2 The second item of the technical
3 manager shall carry out a study of our
4 fleet in order to insure that we don't
5 have any similar situations on any the
6 other vessels.

7 That technical study has been
8 completed. We don't have a similar
9 situation on any of the other vessels.

10 The technical manager will provide
11 proposed inspection on the maintenance
12 schedule for any of the arrangements that
13 were identified.

14 As Kriton is the only vessel that has
15 such an arrangement, a maintenance
16 inspection schedule has been provided to
17 the Kriton. And has been included in its
18 plan maintenance system.

19 And we have developed a procedure
20 requiring that a risk assessment should be
21 carried out prior to a vessel's dry
22 docking in order to ensure that we don't
23 have any such situations, that we may be
24 able to prevent prior to an incident
25 occurring.

1 So we have developed that procedure
2 and it has been included in our company's
3 safety management system.

4 So with regard to modifications to
5 the vessel's piping, the vessel has been
6 training exclusively in West Africa, so we
7 haven't had an opportunity to make any
8 modifications.

9 MR. BUNDY: Okay.

10 MS. TSOCHLAS: That's the end of Item
11 8.

12 MR. BUNDY: Okay. Questions?

13 Okay. Thank you.

14 MS. TSOCHLAS: Item 9 is the last
15 item of the agenda, and it concerns the
16 observations recorded by the IC during the
17 ongoing audit carried out on the M/T
18 Fidias.

19 Here I have the response to all of
20 the observations that were recorded during
21 that audit. So the first observation was
22 regarding the declaration of environmental
23 commitment.

24 A suggestion was made to make a
25 revision as it is considered some of the

1 contents with reference to the oil record
2 book or engine room operations are not
3 related to responsibilities of crew and
4 the deck and steward departments.

5 The references in that form to the
6 oil record book or engine room operations
7 are as examples only, so we don't -- we
8 think this form is quite generic as it is,
9 and quite appropriate for all crew.

10 So should we open it to have a look
11 at it? As you can see here, full and
12 strict compliance with MARPOL regulations
13 and the requirements of our environmental
14 system.

15 The proper disposal of waste --
16 excuse me -- such as bilge slops and
17 sludges.

18 And including correct and completion
19 and also including MARPOL, those relevant
20 to MARPOL, the environmental management
21 plan, the oil log book, and the sounding
22 book.

23 So I think this is appropriate enough
24 to all of our crew members.

25 MR. CHALOS: So in other words, you

1 don't think that a specific reference to
2 the oil record book is necessary or
3 desirable?

4 MS. TSOCHLAS: The aim of this form
5 is to ensure that all of our crew members
6 are fully aware that we do not support
7 contravention to MARPOL regulations.

8 When we --

9 MR. BUNDY: Any comments or questions
10 on that issue?

11 MR. WIGGER: I can comment on that.
12 This finding is the opinion of the auditor
13 who carried out the audit, which is
14 Captain Joshi.

15 And in my review now, when we submit
16 these audits I don't like to remove the
17 recommendations since they are made in the
18 observations, so I did submit that. But
19 in my opinion, this form is sufficient for
20 the entire crew.

21 Now, that said, I guess I could have
22 possibly removed it, but I think it was
23 good for discussion and to get the
24 opinions of Ionia, so I decided to leave
25 them in there.

1 MR. BUNDY: Okay.

2 MR. WIGGER: But I think the form
3 itself is sufficient and I don't really
4 think it needs to be revised.

5 MR. BUNDY: Okay.

6 MR. CASHMAN: Mr. Bundy, it's
7 Lieutenant Commander Cashman. One thought
8 or point for discussion.

9 Since it's going to all crew and the
10 auditor specifically noted that the deck
11 crew and the stewards may be a reference
12 or an example along with the oil record
13 book is to add that, the garbage log or
14 something else that they may see on a
15 daily basis, may make it more applicable
16 to them.

17 MS. TSOCHLAS: We do state that all
18 the requirements to MARPOL and our
19 environmental management plan, we could
20 make more examples.

21 But it's just more work. We want to
22 make sure our seafarers read what they are
23 signing.

24 MR. WIGGER: And the important part
25 of this declaration of enviromental

1 commitment is really the last paragraph
2 about the understanding, the noncompliance
3 with the instructions that may make the
4 company liable.

5 It's important they understand that
6 and they are onboard with that.

7 MR. BUNDY: Okay. Appreciate it.
8 Thank you.

9 MS. TSOCHLAS: And then, when it
10 comes to --

11 MR. BUNDY: Okay.

12 MS. TSOCHLAS: When it comes to more
13 specific requirements regarding oil record
14 book and log book, we have that in the
15 familiarization form for the specifics.

16 So then the next observation was to
17 do with the declaration of environmental
18 compliance upon sign off.

19 And as we have already discussed,
20 that was originally only for the officers.
21 We have expanded now that form to include
22 all crew members and they can see that
23 here. If you go further down.

24 MR. BUNDY: Okay.

25 MS. TSOCHLAS: We state that this

1 form is to be completed by crew members
2 and not by the officers.

3 The third item has to do --

4 MR. BUNDY: Okay. As Ms. Tsochlas
5 goes through each one of these, please
6 feel free to make -- ask any questions or
7 comments as she finishes each one as she
8 goes through each one of these.

9 So any of the parties could speak up
10 as it may -- as you may think necessary.

11 So if we'll just continue to go
12 through these. And if there are issues,
13 I'll be alert for anybody that wants to
14 speak.

15 Okay.

16 MS. TSOCHLAS: The third observation
17 was to do with the environmental
18 procedures for noncrew members. As we've
19 already discussed, we have discontinued
20 that form and we currently are preparing
21 notices to be posted at the gangway.

22 The revision indicates in the
23 discontinuation of the form was
24 distributed to the fleet on the 10th of
25 June of 2010, just after the ongoing audit

1 on the M/T Fidias.

2 Now, the fourth item was to do with
3 the ballast water management plan. The
4 CFR regulations regarding the ballast
5 water exchange included in that plan were
6 not up to date.

7 That observation had been reported on
8 the M/T Theo T by Captain Wigger, and we
9 have corrected that observation onboard.

10 We checked onboard to make sure that
11 the CFR updated with ballast water
12 management plans onboard all our vessels.

13 And those requirements, the updated
14 CNR requirements were provided to the
15 vessels that were made in 2010. And the
16 vessels confirmed that the ballast water
17 management plan has been updated
18 accordingly.

19 MR. WIGGER: I did, on that one, I
20 did talk with Captain Joshi and he did
21 indicate that those were aboard and that
22 his comments that they were not was likely
23 an error.

24 So that was confirmed. But that was
25 a -- also a -- on the Theo T at that time

1 it was not corrected and it was noted on
2 the Theo T audit.

3 And between the Theo T and Fidias
4 audit, it was corrected and it was
5 corrected onboard the Theo T during the
6 time we were onboard.

7 MS. TSOCHLAS: So Observation 5
8 refers to the ballast water log. And this
9 was reported both on the Theo T and on the
10 Fidias.

11 I think from what I understand,
12 Captain Wigger had a discussion with the
13 chief officer. And the chief officer also
14 thought that the format should be changed.

15 But we spoke to other crew to the
16 other vessels and most of our seafarers
17 are satisfied with the performance and the
18 way it is right now. So we're going to
19 leave it the way it is.

20 MR. WIGGER: Okay. And again, that
21 was a recommendation. There's no specific
22 requirement either in the US rules or the
23 guidelines on the format.

24 However, experience with the State of
25 California, which does have a fairly

1 accurate ballast water enforcement
2 program, they highly recommend that a
3 rather than a sequential -- not
4 sequential, but just a listing of tanks,
5 operations on each tank, that one page be
6 dedicated per tank.

7 And that way you can see the complete
8 history of that tank at a glance, rather
9 than flipping through pages and pages to
10 find out.

11 And that is generally during a
12 ballast water inspection. The enforcement
13 personnel like to look at the history of
14 the tank and see what's happening.

15 But either way, either way is
16 acceptable, and it really is up to the
17 company.

18 Even on other vessels we attend we
19 make this recommendation just because
20 it's, in our view, it's a better way of
21 doing it. But it doesn't necessarily mean
22 it's the only way. So --

23 MR. BUNDY: How did that go when the
24 Theo T called into Long Beach?

25 MS. TSOCHLAS: We had no problems at

1 Long Beach, so no problems were reported
2 to us.

3 MR. WIGGER: And on board you'll have
4 some of the personnel and sometimes it's
5 just to satisfy the auditor. They'll
6 agree with you. But I think, sincerely,
7 sometimes they'll say, yes, that is a
8 better way.

9 But it's strictly up to the company
10 and their policies how they want to have
11 consistency in how they maintain their
12 logs. So I have no problem with it
13 remaining as it is.

14 MR. BUNDY: Okay. Great.

15 MS. TSOCHLAS: Let's go to the next
16 item.

17 The next observation was to do with
18 the incinerator capacity. It was listed
19 in supplement to the IOPP certificate as
20 49.9-kilograms per hour; whereas, the
21 manual specified indicated 38-kilograms
22 per hour.

23 We -- we investigated that and test
24 certificate which was issued with the tank
25 approval, shall we open that?

1 Indicates 50-liters per hour, which
2 is about 49.9-kilograms per hour. That's
3 why the classification society recorded
4 that on the Form B.

5 So the manual specifications were
6 more generic this is the actual test
7 certificate.

8 MR. WIGGER: I think this was a
9 finding on the Theo T as well.

10 MS. TSOCHLAS: Yeah.

11 MR. WIGGER: Same.

12 MS. TSOCHLAS: It's the same thing.

13 MR. WIGGER: Same as --

14 MR. CHALOS: May I have ask a
15 question, Mr. Bundy?

16 MR. BUNDY: Sure.

17 MR. CHALOS: Where did the 38 come
18 from?

19 MS. TSOCHLAS: From the manual.

20 MR. CHALOS: The manual also said 38?

21 MS. TSOCHLAS: Yes.

22 MR. CHALOS: Was that a generic
23 number, as opposed to a specific unit
24 number?

25 MS. TSOCHLAS: That's which -- what

1 the incinerator generally design for, but
2 then when they carry on the test for
3 findings they find the specific
4 incinerator.

5 MR. CHALOS: So you were using the
6 one that is specific --

7 MS. TSOCHLAS: The classification
8 society is using the one from the test
9 certificate.

10 MR. CHALOS: Are you all right with
11 that, Mr. Wigger?

12 MR. WIGGER: Yes. Again, you know,
13 the manual is a equipment specific manual
14 and that's the manufacturers test.

15 But as Ms. Tsochlas points out, when
16 they do the type testing they evaluate
17 that. And so, yeah, that's not a problem.

18 Again, the recommendation there was
19 to make sure that the accuracy in the
20 supplement to the IOPP was correct.

21 And I think that this, that that
22 indicates that that is correct.

23 MS. TSOCHLAS: Yes.

24 MR. BUNDY: Okay.

25 MS. TSOCHLAS: The garbage management

1 plan had some items that were missing and
2 we were recommended to include storage --
3 garbage storage areas on the
4 ships-specific basis, and the details of
5 waste management machinery on a
6 ship-specific basis along with their
7 instructions for use.

8 We have revised the garbage
9 management plan in order to address some
10 other problems that we have also
11 identified ourselves.

12 And that revised garbage management
13 plan was prepared for the entire fleet on
14 a vessel-specific basis at the end of
15 June. So here we have an example of Theo
16 Ts, it's 52 pages, so we won't go through
17 all of that.

18 MR. WIGGER: Does that new manual
19 have a ship-specific appendix in it?

20 MS. TSOCHLAS: Yes, it does.

21 In the ship-specific appendix, it
22 has -- if you go towards the end -- go a
23 little bit back here we included waste
24 stream management process that we have in
25 management plan.

1 And go a little further up as well --
2 sorry, no, down this page.

3 We've also developed our own garbage
4 receipt because a lot of the time disposal
5 facilities give very generic garbage
6 receipts.

7 So we developed our own so we can
8 record waste separately and attached the
9 receipt by the shore facility. So we know
10 exactly what was disposed of each time.
11 And it can support the entries in the
12 garbage log book.

13 Here we have the instructions, the
14 Theo T has food waste disposal, as well as
15 the incinerator. So we have included
16 instructions for use here, which I think
17 it's towards the end.

18 Also, updated the management plan
19 with policies because since the plan was
20 prepared on the Theo T, we have stopped
21 incineration of plastic in accordance with
22 MARPOL Annex 6 and we also -- we only
23 discharge food waste, so the plan is being
24 updated.

25 Okay. So I think we should move

1 along.

2 Item 8 was to do with hazardous
3 special waste such as pyrotechnics to be
4 specified in our waste stream management
5 process. We have expanded our waste room
6 management process to include those items.
7 And we can open that link here.

8 If you go to the right we have the
9 special waste category. And in that
10 category we've included chemicals,
11 medicines, batteries, fluorescent bulbs,
12 pyro techniques, solvents, degreasing and
13 cleaning waste and boiler and engine
14 chemicals. So we expanded that process.

15 MR. WIGGER: I'll just mention one
16 item here. That is beyond the -- actually
17 the MARPOL requirements.

18 MARPOL doesn't specifically require
19 that hazardous waste be segregated. So it
20 is beyond the MARPOL requirements.

21 MS. TSOCHLAS: Yeah. Now, Item 9 was
22 to do with the special inventory log
23 that's maintained by the master and the
24 engine room seal log is maintained by the
25 chief engineer.

1 He makes a comment that the metallic
2 seals are in use, are of poor quality. We
3 had originally placed plastic seals
4 onboard the vessels and we did find
5 problems with the plastic seals.

6 Because with the high temperatures in
7 the engine room, they would lose their
8 elasticity and break easily.

9 So we went through the process of
10 finding better seals with the wider prong
11 and we replaced them onboard our vessels.
12 So these seals, in our opinion, are of
13 better quality than what we had before
14 onboard.

15 With regard to some of the broken
16 seals that were not accounted for, we are
17 reviewing process in order to see how we
18 can include that as an entry in the seal
19 log book.

20 MR. WIGGER: This is a problem that
21 we see on a lot of vessels, not only Ionia
22 vessels, but it does bring up a problem
23 because if you have seals that are either
24 drying up, breaking, you know, you can
25 always, in our view, you can always claim

1 that, well, the seal just broke on its
2 own.

3 If you wanted to do something. So
4 again, to maintain accountability, the
5 quality of the seals is critical.

6 And yet, I don't know if there's a
7 seal out on the market now that meets, you
8 know, the needs that will hold up under
9 all the temperatures that you have in the
10 engine room and everywhere else.

11 It is a problem. And, again, it's
12 important for us that accurate logs and
13 records be maintained to indicate why the
14 seal was replaced.

15 MS. TSOCHLAS: Well, originally, as I
16 said, the seal was plastic and the
17 seafarers came back to us and said they
18 were having a problem because they kept
19 breaking.

20 It was making it difficult to account
21 for. So we noticed it's a big process to
22 change all the seals with the chaos
23 onboard.

24 MR. WIGGER: And the seals have to be
25 breakable in the event of an emergency

1 or -- and we have had some ships that have
2 installed essentially unbreakable seals,
3 seals that you'd actually have to cut.

4 So that's a problem, too. But
5 depending upon location where the seals
6 were installed, you know, breaking the
7 seals are important.

8 MS. TSOCHLAS: But these seals are
9 not so easy to break. They have a wire
10 core, so you pull at them quite hard and
11 they don't break quite easily. We
12 consider these improved quality.

13 Item 10 was to do with the
14 operational test of the oily water
15 separator.

16 The vessel basically didn't have
17 enough bilges onboard for the test to be
18 carried out long enough time. So the
19 recommendation was to make sure we had
20 more bilges onboard to facilitate the
21 test.

22 Item 11 was to do with the
23 electronic --

24 MR. BUNDY: Hold it.

25 Could we go back?

1 The -- just the comment has been
2 noted and taken into account.

3 What does that mean?

4 MS. TSOCHLAS: Next time we have an
5 order we'll make sure we have more bilges
6 onboard.

7 We won't dispose of them.

8 MR. WIGGER: Okay. Just again,
9 knowing that an audit is going to be
10 carried out, and I don't know if your
11 audits -- are they unannounced?

12 No.

13 MS. TSOCHLAS: That was very last
14 minute.

15 If you remember, I called you up on
16 Friday for a Sunday.

17 MR. WIGGER: But, yeah. So if
18 knowing that an audit will take place
19 we -- the ship should know also that we
20 will require an operational test.

21 But it was a last minute audit on
22 Fidias. It was like Friday, we had to be
23 there Saturday I think it was. So they
24 had already processed.

25 But the important thing for us is

1 that we can carry out an operational test
2 and if you don't have any liquid in the
3 bilge holding tank it's -- you really
4 can't do a test.

5 MR. BUNDY: Okay. The problem was
6 that it had been pumped ashore?

7 MR. WIGGER: Previously.

8 MS. TSOCHLAS: Yes. We have arranged
9 for the bilges to be disposed on the shore
10 facility. And in the meantime, we have
11 arranged very last minute, the ongoing
12 audit to be carried out.

13 As Captain Wigger said, Friday I
14 requested it and Sunday, Captain Joshi was
15 in Greece_f to pull the vessel. So we
16 already disposed of the bilges.

17 So next time we'll make sure that we
18 keep bilges onboard so that he's able to
19 carry out an operational test.

20 MR. BUNDY: Okay. Thank you.

21 MS. TSOCHLAS: The next item has to
22 do with the electronic preventative
23 maintenance system, and the oily water and
24 the sewage treatment plant. We have
25 already discussed this earlier. The

1 electronic plan maintenance system has now
2 been updated as of the 10th of June.

3 And instructions tasks are included
4 in the plan maintenance system regarding
5 the oily water separator and the sewage
6 treatment plant.

7 Item 12 refers to the tank sounding
8 log. The order suggested that we include
9 remarks column and the certification
10 statement on the form.

11 We have made those revisions. The
12 form -- the revised form is already in
13 effect onboard our vessels.

14 Go to the next item. This is the
15 order to carry out the comparison between
16 the SWOMS data and manual samplings so we
17 have some tables here. Go to the next
18 table.

19 He found that there was some
20 discrepancies between the manual tank
21 soundings and the SWOMS soundings.
22 However, those discrepancies were not
23 alarming due to the capacity of the tanks.

24 He did suggest, though, that three
25 manual tank soundings be carried out and

1 an average taken. We would like to avoid
2 doing this because our seafarers are going
3 to get confused carrying out three
4 soundings.

5 So we prefer that any discrepancy we
6 may have is within acceptable limits.

7 MR. BUNDY: Could you speak up a
8 little bit and a little bit more directed
9 towards the microphone.

10 You are speaking -- away from it and
11 I can't hear you.

12 MS. TSOCHLAS: The order has
13 suggested that our seafarers carry out
14 three sounds of each tank and they
15 calculate the average of those soundings.

16 But we think that this will just
17 create confusion amongst our seafarers
18 having to carry out three soundings and
19 calculate the average.

20 So we would prefer them to carry out
21 one tank sounding and we will monitor any
22 discrepancies that we have that may be
23 alarming.

24 MR. BUNDY: Captain Wigger, do you
25 have any comment?