Compliance Systems, Inc.

Hamilton House ♦26 E. Bryan Street ♦ Savannah, Georgia 31401 USA
Telephone: (912) 233-8181 ♦ Fax: (912) 231-2938 ♦Telex: 145025
E-mail: csi@compliancesystemsinc.com ♦ Web site: www.compliancesystemsinc.com

June 23, 2010

ENVIRONMENT COMPLIANCE PROGRAM
ON-GOING AUDIT REPORT
M/T FIDIAS, IMO NO. 9358955
CONDUCTED AT ANCHOR AND UNDERWAY OFF PIRAEUS, GREECE
JUNE 7 & 8, 2010

Preliminary

The undersigned conducted an On-going Environmental Audit aboard the M/T Fidias, while the vessel was anchored off Piraeus roads, and later underway around Piraeus. The underway portion of the audit was carried out while the vessel steamed out to sea 60 nautical miles off Piraeus, before returning to Piraeus anchorage for orders. Total underway time was approximately five hours.

The M/T Fidias is an Oil/Chemical tanker of 30,004 GRT, built by STX Shipbuilding, Jinhae shipyard in Republic of South Korea. The vessel was delivered to present owners and managers on June 29, 2007. The vessel is powered by a B&W six cylinder main engine of 9490 KW. Vessel particulars are attached.

The vessel is fitted with Oil Filtering and Oil Detection equipment complying with IMO MEPC Resolution 107(49) and has Oil Detection Monitoring Equipment complying with IMO MEPC Resolution 107(49). The vessel also has a Special Waste Oil Monitoring System (SWOMS) fitted on board.

Audit participants included:

Master	Pouletsos Theodoros
Chief Engineer	Nakos Filippo
Chief Officer	Catacutan, Angelito M.
2nd Engineer	Alcampor, Rudy C.
3rd Engineer	Santos, Edison M.
4th Engineer	Dornila, Wynces S.
Electrician	Estrella Alejandro C.
Bosun	Mariyappan Kothandath Vijayakumar
Chief Cook	Justo, Leonardo P.

In addition to the above, various crewmembers from all departments were interviewed at different times with regard to their duties related to environmental aspects of ship operation, awareness of Company EMS manual and communication procedures for anonymous reporting of Environmental violations or irregularities.

The audit was conducted in accordance with Attachment A, Section B of the Special Master Appointment and Scope of Work pursuant to the criminal case, United Sates of America vs. Ionia Management S.A., Criminal No.3: CR134 (JBA). The audit process consisted of a review of Safety Management System (SMS), the company issued and implemented Environmental Management System (EMS) documents; records and procedures related to environmental matters; MARPOL required logs and records; inspection and testing of vessel's waste handling equipment, including the oily water separator (OWS), incinerator, sewage treatment plant (STP); and interviews with vessel personnel.

To comply with Scope of the Work document, Ionia Management has developed an Environmental Management Manual (EMM), and it has been placed aboard. The EMM contains environmental policies and procedures in alignment with the Scope of Work, as well as additional environmental procedures, developed by Ionia Management. In addition, some environmental procedures are also contained in the vessel's SMS Manual. Ionia Management is certified for ISO 14001/2004, DNV certificate No. 24257-2008-AQ-HRV-RvA, issued on April 08, 2008 with expiry on April 08, 2011. There were no specific manuals aboard, containing requirements or procedures related to this certification beyond the vessel's SMS and EMM.

Overall, the environmental procedures and requirements were well implemented on this vessel. The officers and crew were cooperative and supportive of the audit. Senior officers, including the Master, C/E. and C/O were knowledgeable of the Scope of Work requirements and the commitment of the management was obvious through the EMM implemented on board. This was indicated throughout the audit and during interviews with officers and some of the ratings.

Following observations, some with recommendations were recorded. They are supported by the attached EMS Audit Checklist and the enclosures to this report. The observations are separated into two categories: one with recommendations and the other without recommendations. The recommendations relate to improvement of the existing EMM and do not necessarily reflect deficiencies or non-conformances with the requirements of the Scope of Work. The second category of Observations is included in the audit report to provide an understanding of the functionality of the EMM aboard. The recommendations made in the previous audit were reviewed during this audit.

Observations with Recommendations

1. Included in the recently implement EMM is a Declaration of Environmental Commitment, Form ENV 020 (copy attached). This form needs a revision as some of the contents with reference to Oil Record Book (ORB) and engine room operations are not a part of the responsibilities of deck and steward departments. Recommend a generic declaration by sea staff prior to joining the vessel with a copy to the Master, declaring full compliance with company procedures for MARPOL compliance and an obligation to report any illegal activity performed.

2. The Declaration of Environmental Compliance, Form ENV 021, signed upon sign-off, is only completed by senior officers, engineers and electrician. Recommend the form ENV 22 be revised to reflect the responsibilities of crew signing off the vessel and be completed by all crewmembers upon sign-off.

3. Environmental Procedures for Non-Crew Members, Form ENV 022, (copy attached) is implemented aboard. Currently, the form is required to be signed by all non-crewmembers who come aboard, e.g. vendors, surveyors, pilots, agents, etc. To reduce the amount of paperwork and burden upon the crew, recommend the form be eliminated and a readily visible notice posted at the gangway, with the watch-stander pointing out to all boarding personnel. The form should also be posted at other locations aboard, visible to visitors. As an alternative, or in addition, the information could be printed on the visitor pass. This information could be condensed and selected environmental information added.

4. During review of the Ballast Water Management Plan (BWMP), it was observed that it is in alignment with the IMO Guidelines and also meets the ship-specific requirements of the U.S regulations. The appendix containing the U.S. ballast water exchange and reporting requirements, however, had some outdated information. The C/O with regard to his knowledge of the U.S. ballast water requirements was found to be aware and knew the current requirements that were contained in the U.S. Code of Federal Regulations (CFR), a copy of which was on board. Recommend the section of the BWMP be updated with the current U.S. requirements, or a reference be made in the requirements section to the CFR.

5. The vessel maintains a Ballast Water Log in the format required by the BWMP, detailing the ballast operations associated with each ballast water tank. Ballast water operations are listed consecutively, with the identity of each tank, while the current format is acceptable, using a page for each tank would make tracking operations associated with each ballast tank much easier. Recommend consideration be given in this regard.

6. The incinerator capacity listed on the Supplement to the IOPP Certificate for oil residues is 49.9 Kg/h. The manual specifications indicate a capacity of 38Kg/h. Recommend that the accuracy of the Supplement to the IOPP Certificate be verified by Class.

7. The Garbage Management Plan (GMP) is a fleet-wide plan with no ship-specific information. Recommend ship-specific information be added in the form of an appendix, detailing location of garbage storage and segregation areas, details of equipment such as incinerator, galley food grinder and specific procedures/restrictions regarding their use. Also a color coding should be posted in various locations indicating the type of garbage stored in the containers.

8. Hazardous waste such as fluorescent tubes, expired batteries, pyrotechnics, and medicines are being segregated from non-hazardous garbage and disposed of ashore. Shore side receipts specifically listing the categories of hazardous waste being sent ashore are being maintained by the C/O. There are, however, no procedures for the disposal of hazardous waste contained in the GMP. Chapter 6 of the EMM contains a

table for the proper disposal of both non-hazardous and some categories of hazardous waste. Recommend procedure also be included in the GMP and the listing of hazardous waste aboard be expanded to include all potential types found aboard, such as solvents, degreasers and cleaning wastes, oily rags, fluorescent and incandescent bulbs, expired/used boiler and engine chemicals, galley greases, pyrotechnics, etc.

9. A Spare Seal Inventory Log is maintained by the Master, and an Engine Room Seal Log is maintained by the C/E. Both logs are bound with sequentially number pages. Locations of seals are generally identified by a coded system. In addition, a piping system diagram identifies locations where seals are placed. The type of metallic seals used is of very poor quality and it was reported by the C/E that they invariably break during routine maintenance and painting operations, and get lost. The broken seals were not accounted for. Recommend the revision of seal procedure to account for all the seals on board unused, used in place and broken for operational reasons. A few seals were unaccounted for in the system.

10. An operational test of the OWS was carried on June 8, 2010. An overboard discharge with the skin valve open was carried out while the vessel was underway. The re-circulation (in-port) test was carried out prior to the overboard discharge to test the OCM 15 ppm alarm and the function of the three-way Solenoid valve. Both were found working satisfactorily. The oil purge valve was also tested upon start-up. The sea test of OWS could not be carried out for a period of at least one hour to test the rated capacity of the unit as the effluent in the source tank BHT was very low and the OWS automatically stopped, as the pump tripped due to low sounding. Recommend that in the future the BHT not be pumped out prior to a scheduled audit and there be sufficient quantity for at least one hour of test.

11. The vessel has a computerized Preventative Maintenance System (PMS) using the Ulysses software. The PMS contains detailed maintenance procedures for the incinerator, which are in alignment with the manufacturer's recommendations. Maintenance procedures for the OWS and Sewage Treatment Plant (STP), however, are limited and do not appear to be in full alignment with the manufacturer's recommendations. As an example, the STP manual recommends the periodic removal of accumulated sludge. There is nothing in the PMS addressing this, nor is there any record on board of this being accomplished. Recommend that the manufacturer's maintenance procedures be reviewed for all pollution prevention equipment (PPE) to ensure onboard procedures are in alignment.

12. The vessel maintains a Sounding Log as required by Section IV and Attachment B to the Scope of Work. Excerpts of the Log for the month of May 2010 are attached. The revised form of the Sounding Log with the initials of the deck officer witnessing the taking of the soundings as required by the Scope of Work is currently in use. The revised form eliminated the Remarks column and the certification statement. Recommend both be added back. While there were no Remarks in the previous completed form, a Remarks section would be beneficial to explain significant changes in soundings from one day to the next, e.g. operation of OWS, incinerator, transfer to slop tank.

13. SWOMS (Special Waste Oil Monitoring System) data for tank soundings was compared against manual tank soundings. The following table shows the results:

Date & Time: June 06, 2010, Piraeus at noon							
Tank	Cap. (m^3)	Manual (cm)	Manual (m^3)	SWOMS (cm)	SWOMS (m^3)	Diff. (m^3)	% Diff. (m^3)
Sludge	14.60	16.0	2.43	13.0	2.45	0.02	0.8%
Bilge Oil	13.90	28.0	0.86	24.0	0.63	0.23	26.7%
Waste Oil	1.79	89.0	1.25	87.0	1.17	0.08	6.4%
BHT	22.70	50.0	3.59	51.0	3.68	0.09	2.5%

Date & Time: June 03, 2010 at noon							
Tank	Cap. (m^3)	Manual (cm)	Manual (m^3)	SWOMS (cm)	SWOMS (m^3)	Diff. (m^3)	% Diff. (m^3)
Sludge	14.60	17.0	2.57	14.0	2.57	0	0%
Bilge Oil	13.90	28.0	0.86	19.0	0.48	0.38	44.2%
Waste Oil	1.79	42.0	0.58	27.0	0.36	0.22	37.9%
BHT	22.70	50.0	3.59	50.0	3.55	0.04	0.1%

The above records were obtained from the form ENV 024. Seas were calm when the soundings were recorded. Some soundings and quantities show significant differences. The waste oil tank has a very small capacity making the difference insignificant at the same time the BHT shows on the June 6 quantity significant value, but considering the tank capacity the difference is not alarming. To ensure the integrity of manual soundings recommend that the soundings be taken at least three times and use the average of the three. This may help to improve accuracy to overcome the vessel movement.

14. Neither the F.O. Drain Tank nor the Scavenger Air Box Drain Tank is monitored by the SWOMS. Both tanks are considered oily residue (sludge) tanks and are listed on the Supplement to the IOPP Certificate under 3.1. The size of the FO Drain Tank is 6.60 m^3 and the M/E Scavenger Air Box Drain Tank is 0.40 m^3. Recommend that the management evaluate whether these tanks should be included in the SWOMS.

15. The ODME is tested monthly by the C/O and recorded in an ODME Test log (excerpt attached). During the audit, the ODME was tested by the C/O in my presence. Instructions contained in the manufacturer's manual were used to perform the tests, with values for ship speed, PPM, and flow rate manually entered. Due to the vessel being at anchor and also, since a blank flange is installed in the ODME discharge line, an actual discharge test could not be performed. It should be noted that the vessel does not discharge its slop tanks at sea. All slops from ballast and tank cleaning are sent ashore. The ORB Part II verified this. Accordingly, the ODME was tested based on the manual value input. The discharge prohibited alarm was also verified, along with the operation of the recirculation valve. The C/O was competent in the ODME operation and knowledgeable of the discharge requirements. As per the Scope of Work, recommend that the monthly testing also be recorded in the ORB.

16. The Oil Transfer Procedures required by 33 CFR 155.720, are not in full alignment with the regulations. Recommend that the procedures be amended to include specific citing of these regulatory requirements.

17. A flexible hose inventory is kept, with hoses stored in the mid-ship house and forecastle. There are, however, no tags or labels to identify each hose. Recommend that the hoses be identified in some manner to ensure they are properly controlled for the intended use and accounted for.

18. The Fleet Engineering Survey, Form (attached) ENV revision 2, effective date 22 March, 2010 was completed by Chief Engineer, but the form was dated 31 December 2009 as completed. It is recommended that the management check these forms for misleading discrepancies and these forms be completed by all engineering officers on board.

19. The Chief Officer was holding an anonymous reporting box with forms in his possession. The management has discontinued the use of anonymous box for reporting EMS non-conformances. It is recommended that management should inform the vessel of anonymous reporting policies and monitor the procedures adopted by vessel staff during the visits by company officials.

20. The pre-joining training form for the familiarization/training for the proper care and disposal of oily waste (form for C/O dated May 7, 2010, attached) does not seem to be relevant to the rank and was not given to all crew members. Recommend that the training be relevant to the rank and consistent to all crew members with course material on board for verification and properly indentified forms or certificates.

21. The copy of the last page of the C/E's hand over/take over report is attached. Section 28 describes the items related to pollution prevention. There is no mention of the seal log or number of seals. The minimum stock of oil pollution equipment on board shows satisfactory. Attached is a copy of requisition submitted by C/E for filter elements of Oily Water Separator dated November 5, 2009. To-date (June 8, 2010) no spares were received by the vessel. It is recommended that the management treat the OWS as critical equipment for company's environmental performance and prioritize the supply of spares as soon as possible.

22. The company has other vessels in the fleet which are not subject to Scope of Work. Only two vessels are currently subject to plea agreement conditions, and as the officers are interchangeable between the fleet, it is recommended that the officers especially engineers getting transferred from other vessels to the two vessels subject to plea agreement conditions, be given additional training regarding compliance with Scope of the Work. The engineering staff on this vessel though knowledgeable of their task, seemed a little out of depth on the court requirements for general understanding of the issue.

23. The Form ENV 09 Chief Engineer's weekly report W23/ 2010 (form attached), shows Sludge generated week 23 as 691.57 m^3 and total burning, evaporated, drained sludges as 692.044. It is recommended that the management investigate the figure for errors as it

is totally unrealistic to generate 691.57 m^3 of sludge in a week and it is impossible to burn more than generated.

Observations without Recommendations

1. Various engine room pumps and machinery in operation were observed during the period of time the vessel was at anchorage and underway. The engine room was noted to be in a very clean condition. No oil or oily residue was noted in the bilges or bilge wells. The bilge-well below the main engine fly wheel was dry and free of any presence of oil. According to the C/E, if any oil residue accumulates in the mid bilge well below the M.E. flywheel, the oily residue is removed manually and transferred into the SBOT to avoid contamination of the BHT. The bilge wells contained only small quantities of clean water. The BHT was last cleaned on February 17, 2010. No leakages were noted from operating cooling water and general service pumps and there was no evidence of excessive leakages from static pumps. The accumulation of fresh water in the bilge wells appeared to be due to condensation on pipes from the main engine air cooler. Based on review of the ORB bilge well transfer entries and the Sounding Log, bilge loading is minimal, around 1.0 m^3/week. The purifier room was very clean, with no evidence of leakages from the purifiers. Auxiliary diesel engines on line, and fuel oil and lube oil pumps and valves were also noted to be leak free.

2. The pipe adjacent to OWS overboard valve was opened for inspection on June 8. The auditor inspected the valve end. The valve end and pipe ends were free of oil. All the bilge alarms were tested and samples taken for analysis ashore. The OCM was tested and OWS was put on test with BHT as source tank with overboard skin valve open. The Test commenced at 1130 and was concluded at 1157 due to tripping of the pump due to low sounding in the tank. Samples of effluent incoming and outgoing were taken every 15 minutes for comparison. Photos attached. The rate obtained was 3.348 m^3/h. OWS is rated at 5.0m^3/h.

Time	Sounding in cms	Qty in m^3
1100	0.52	3.818
1157	0.36	2.144

3. Section 11 of the EMM details the procedure for crewmembers to report environmental concerns and to remain anonymous if so desired. Crewmembers may report such concerns by calling a toll free telephone number, anonymous reporting email. The notices to this effect are well posted in different locations and common areas of the ship.

4. Cargo pump room and steering gear room were noted to be exceptionally clean, with no apparent leakages from pumps.

5. An Environmental Performance Report, Form ENV 004, is submitted to the Ionia office on a monthly basis. Included on the form are garbage and hazardous waste disposal quantities

6. Incineration of sludge and evaporation from the WOST are carried out on a regular basis. According to the ORB, the last three sludge incineration/shore disposal operations were as follows:

No.	Date 2010	Quantity m^3	Time hours	Remarks/rate
1	May 23	4.8 Sludge 10.57 Bilge water		Sent ashore at Ventspils
2	June 05	0.69	14h 06mt	48.9 L/h
3	May 28	0.73	15h 04mt	48.47 L/h

The vessel generates about 300 litres of sludge per day. Fuel consumption is about 40.0 m^3/day, less than 1%. See attached Chief Engineer's Weekly Report, Form ENV 009. Sludge tank capacity, according to the Supplement to the IOPP Certificate, is 14.6m^3. Sludge tank capacities and incinerator capacity appear sufficient to manage the storage and disposal of sludge.

7. A test of the incinerator burning sludge was carried out on June 8, 2010. Incinerator was started at 1000 and run until 1200, with no stoppages. 100 litres of sludge from the WOST were burned, giving a rate of 50.00 litres/ hour.

Time	Sounding in cms	Qty in m^3
1000	0.64	0.90
1030	0.62	0.87
1100	0.59	0.83
1130	0.58	0.81
1200	0.57	0.80

8. The vessel is fitted with a sewage treatment plant (STP) made by DVZ, type DVZ-SKA-20, BIOMASTER, with a rated capacity of 3.70m^3 per day. The International Sewage certificate shows a holding tank with a capacity of 7.488 m^3. All black water is treated with the recommended chemical dosage for discharge overboard. According to the C/E, the STP is in continuous operation, both in port and at sea, with the direct overboard valve kept chained and locked in the closed position, except during short periods of maintenance, while at sea. Accordingly, only treated sewage is discharged. The model type indicates capacity for only 20 persons. The present complement during the audit was 23 persons. The vessel, however, is also equipped with a vacuum toilet system, which substantially reduces the amount of black water requiring processing.

9. The rated capacity of the OWS is 5.0 m^3 /hr. It appears adequate for the currently generated machinery space effluents. According to the ORB, the last three operations of the OWS were as follows:

Date2010	Qty in m^3	Time	Duration	Calculated rate
May 02	3.561	0801 - 0847	00h 46 m	4.64m^3/hr
May 17	8.4	0914 - 1114	02h 00 m	4.20m^3/hr
**Jan 13	3.7	1123 - 1837	07h 14 m	0.51m^3/hr

** The last operation involved investigation and inspection during the operations hence the rate is low as per C/E's comments.

As noted above, there has been no recent processing of oily bilge water through the OWS except during the audit. The vessel is equipped with a means to transfer E/R bilge water and sludge to cargo slop tanks. Section 3.2.4 of the Supplement to the IOPP Certificate allows this. Currently, the BHT and sludge tanks are periodically transferred to the cargo slop tanks through this approved connection. The cargo slop tanks are subsequently transferred ashore. In the port at Piraeus on arrival contents of the slop tank were disposed in a barge. The C/E and the C/O were aware that any machinery space bilge or sludge transfer to the slop tanks must be discharged ashore. ORB Part II entries verify all machinery waste transferred to the slop tanks is being sent ashore. Corresponding entries for the transfers to the slop tanks are recorded in the ORB Part I and Part II.

10. As per the Scope of Work requirements, samples of the following were taken for content analysis:

    a. Bilge Well Aft — Seal # 329733
    b. BW Fwd Port — Seal # 329729
    c. BW Fwd STBD — Sea l# 329728
    d. BHT — Seal # 329732

    All samples taken appeared clean water with no visible oil. The samples were sent ashore for analysis to company nominated Laboratory: NAIAS Labs in Piraeus, Greece.

11. A log of incinerator and OWS operations is maintained. All alarms are manually recorded in the Alarm Log. This is in addition to the ECR console printout.

12. The vessel has a Deckma OCM, model OMD 2005, which conforms to requirements of MEPC 107(49). The OCM was last calibrated on April 22, 2010; previous calibration was in July, 2009. The Scope of Work requires recalibration at least annually, with copies of the certificates maintained on board. Previous certification copies were sighted.

13. With the installation of the SWOMS, the flushing and sample lines to the OCM have been re-routed through the OWS LockBox, disabling the OMD 2005 manual flushing

valve. The OWS LockBox's main function is to provide secured permissive functions that will only allow the 3-way overboard/recirculation valve to be moved to the overboard position once all the permissive functions are met. It will not allow for the mixing of the fresh and sample waters and must sense that enough sample water is flowing to the OCM for at least the last 20 seconds before it will allow control of the 3-way overboard/recirculation valve by the OCM. The flush push button is located on the front of the LockBox sealed cabinet. It is used to activate a solenoid valve in the LockBox which causes a 3-way valve to rotate 180 degrees and put fresh water to the OCM. The push button signal is sent to the main Logger control panel in the ECR where it records that the flushing water has been activated, and then a signal from the control panel is sent to the solenoid in the Lockbox to activate the 3-way flushing valve. The 3-way valve is used to select whether the sample or fresh water is sent to the OCM. The design will not allow dilution of the sample by fresh water. The flow switch inside the LockBox senses when sample water is flowing to the OCM and provides a contact closure to the system. It also provides the contact closure to indicate to the Logger that the OWS is running. There is a flow meter on the outgoing pipe from OWS to indicate the flow of the effluent.

14. Daily checks of the Enviro Logger are being carried out and recorded on Form ENV 024. See attached samples. The ENV 024 is not sent to the management.

15. The manifold trays on deck on either side to contain any leakages or drips during loading, discharging and disconnection of shore connections are adequate to the requirements. The vessel had two portable Wilden Pumps, one on each side of the vessel for use in case of an oil spill on deck during cargo operations and one spare (capacity 8m^3/h). FO vent containment, bunker line containment and sludge discharge containment are adequate and meets the U.S. Pollution Prevention Regulations.

16. The present engineering staff comprised C/E, 2/E, 3/E, 4/E, two oilers, one wiper and an electrician. All appeared adequate to handle the operational, maintenance and repairs workloads for the systems, equipment and components on board. All the staff appeared to be familiar with their tasks. They are fully aware of the effort needed to minimize the waste streams development. The vessel is certified for UMS operation. The Engine Room is manned between 0700 and 2000 while at sea. The 2/E makes rounds at 2300 hrs. The Engine room is continuously manned in port and during cargo operations.

17. Prior to joining MARPOL training is carried out for crewmembers in Manila. An unnumbered form for the C/O is attached. The form does not appear to be relevant to the rank unless the training content is very general and irrelevant. No training material used in prior to joining training-program was on-board to verify the contents. Weekly shipboard training, which includes safety, security and environmental training, is carried out as per the six-month training schedule. Attached is a copy of the schedules for the first half of 2010. Dates when training is conducted are recorded on form PRO6-2/01-11-97 the schedule (form attached). However, there was no record of attendees for each training session. In addition, environmental training is also carried out during monthly Safety Committee Meetings. See attached Safety Committee Meeting Minutes for May 29, 2010. Computer based training (CBT) was implemented on board. Attached is the

email notice to implement, available training courses, designation of which courses each crewmember is required to take, a viewing schedule, and participant log.

18. The vessel had all the manuals of equipment related to waste stream and type test certificates, except the sewage plant. The type tested certificate for STD was not located on board but the name plate on the unit had IMO cert. mentioned. Schematic diagrams and pipeline diagrams were on board. Attached are copies of the sanitary and bilge piping diagrams.

19. The vessel has on board a company booklet titled, “Code of Ethics”. It does not mention CCM for reporting of wrongdoing. The book appears to be more of a philosophical approach than a focused effort to improve performance of the crew.

20. Though the vessel is currently trading in Mediterranean seas, the Chief Officer is filling the NPDES VGP weekly inspection report Ref. VGP 4.1.1 issued by the company’s Qualified Individual, Gallagher Marine Systems.

21. On June 07, 2010, the vessel received eleven (11) revised forms from management for implementation on board (copy of email attached).

The overall condition of the vessel and waste management equipment is good. As noted previously, despite the number of Observations with Recommendations noted above, the Scope of Work and EMM requirements are well implemented and showing improvement. The Auditor appreciates the full cooperation given by the Master and, C/E and all the staff involved with the audit. The ship crew was sincerely interested and very positive in complying with the environmental procedures.

Respectfully submitted

For:
Captain Subhash Joshi
Auditor
Compliance Systems, Inc.

Enclosures

1. CSI Environmental Checklist
2. Vessel Movement Timetable
3. Auditor’s Timetable
4. Details of WSM Equipment
5. Ship’s Particulars
6. Crew List
7. Email re new revised forms and document received by the vessel June 07, 2010

8. Code of Ethics
9. NPDES/VGP weekly reports
10. IOPP certificate
11. Supplement to IOPP certificate
12. Copy of bilge water samples sent ashore for analysis
13. Copies of Envirologger message for June 07, 2010
14. Envirologger checklist form ENV 024
15. IMO Ballast Water reporting Form
16. Ballast water handling Log
17. Vessel Seals Allocation list and diagrams
18. Chief Engineers Weekly report Form ENV 09 for weeks 21/22 and 23 of 2010
19. Monthly tank sounding sheet ENV 08 for the month of May 2010
20. ODME service report for testing by shore company
21. Environmental Protection Procedures for Non-crew members Form ENV 022
22. Certificate Slop disposal in barge at Piraeus of 260.789 m^3 on June 07/2010
23. Last 15 cargoes carried by the vessel.
24. List of Environmental performance related forms in use.
25. Declaration Environmental Commitment, form ENV 020
26. CBT Training Instructions for Implementation Revision I
27. Onboard Safety committee meeting minutes May 29, 2010
28. CBT training programs allocation
29. Training program for 1st half of 2010
30. Drills Program for 2010 with dates of training conducted
31. Monthly schedule of CBT for the crew June 01, 2010
32. Pre-joining Familiarization Training for the Proper care and disposal of Oily waste.
33. O.D.M.E. test records
34. Photos