



Compliance Systems, Inc.

Ongoing Environmental Audit M/T Ploutos

Conducted September 7-11, 2010
Underway Jebel Ali, UAE to Sitra, Bahrain

In the matter of:

United States of America

v.

Ionia Management, S.A.
Case No. 3:07CR134 (JBA)

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Exhibit 3
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September 20, 2010

**M/T PLOUTOS
ON-GOING ENVIRONNEMENTAL AUDIT
ARABIAN GULF
SEPTEMBER 07-12, 2010**

Preliminary

The undersigned conducted an On-going Environmental Audit aboard the M/T Ploutos, IMO No. 9327023, while the vessel was underway and at anchor in the Arabian Gulf. The audit was planned to be carried out when the vessel was in Jebel Ali, Dubai and the next port nominated by charterers. The Auditor joined the vessel on arrival at tanker berth No. 6 in Jebel Ali port.

The vessel arrived from Aqaba partially loaded with a parcel of cargo of unleaded Gasoline via Fujairah (bunkering) for discharge at Jabel Ali, Dubai. On arrival alongside, the vessel was scheduled for a vetting inspection by BP, repairs to Inmarsat Mini M, installation of new Global wireless communication unit and the satellite transmission device and calibration of the SWOMS equipment, the survey of all measuring instruments and supply of ships stores and provisions, etc., and the IT superintendent on board for checking IT equipment and monitoring Global Wireless installation. On arrival with a planned stay alongside of 30 hours the next port of call was not fixed by the charterers. The joining day of the auditor was not fully utilized for the audit due to the activities mentioned above, as all the ship staff was busy. Some available documents were checked after a brief informal meeting with the Master, Chief Engineer and the attending company superintendent. I was later informed by the Master that the vessel was fixed to load her next cargo at the port of Kuwait. It was planned to carry out the audit and testing of WSM equipment during the transit underway to Kuwait. Prior to completion of discharge the Master was informed again of the changes that the vessel was to backload the parcel cargo of unleaded gasoline (20%) for discharge at Sitra, Bahrain. The vessel completed loading operations at 0700 on September 09, 2010 but the departure was delayed due to various local issues, with Ramadan public holidays and port clearance formalities with various crew and non-crew personnel joining the vessel including the auditor. The vessel finally sailed at 1900 hours on September 09, 2010 for Sitra, Bahrain.

The MT Ploutos is a 42,048 mts, GRT, crude oil and product oil carrier, built by New Century Ship Building Co. Ltd., Xin Giang, China and delivered on December 15, 2006. The vessel has a total capacity of 84,534.822 m³ at 98%. The vessel is powered by a HHM-MAN-B&W 5S60MC-C with a BHP14690 and a service speed of 14.5 knots. Vessel particulars are attached.



The Audit participants included:

Master	Vestarchis, Stylianos
Chief Engineer	Simoudis, Ilias
Chief Officer	Ruiz, Roderick A
2 nd Engineer	Defante, Rolly B.
3 rd Engineer	Molas, Jonathan V.
4 th Engineer	Zolina, Leo O.
Chief Cook	Untalan, Florente C.
Electrician	Lavin, Lagunas Eduardo Alex
Safety Quality Supdt.	Dimou, Aristeidis

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 and awareness. (Crew list attached).

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 States of America v. Ionia Management S.A., Criminal No.3: CR134 (JBA). The audit process consisted of a review of Safety Management System (SMS) and Environmental Management System (EMS) documents; records and procedures related to environmental matters; MARPOL required logs and records; inspection and testing of vessel waste handling equipment, including the Oily Water Separator (OWS), incinerator, Marine Sanitation Device (MSD); and interviews with vessel personnel.

To implement the EMS, Ionia Management has developed an Environmental Management Manual (EMM), which 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. The manual is continuously revised based on previous audit reports and a substantial number of revisions were made in June 2010. In addition, environmental procedures are also contained in the vessel's SMS Manual. Ionia Management is also certified for ISO 14001/2004, DNV certificate No. 24257-2008-AQ-HRV-RvA, issued on April 08, 2008 with expiry on April 08, 2011; however, there were no specific instructions aboard, containing requirements or procedures related to this certification beyond the vessel's SMS and EMM.

It was observed that the environmental procedures and requirements were well implemented. The officers and crew were very cooperative and positive throughout the audit. Senior officers, including the Master, C/E. and C/O were knowledgeable of the Scope of Work requirements and the EMM, and appeared fully committed to the purpose and philosophy of the EMM. This was clearly demonstrated throughout audit and during discussions with the staff.



Following are observations and comments. They are supported by the attached EMS Audit Checklist and the enclosures to this report. The observations are separated into two categories - those with recommendations and others without. Many of the recommendations relate to improvement of the existing EMS and do not necessarily reflect deficiencies or non-conformities with the requirements of the Scope of Work. The second category of Observations is primarily included in the audit report to provide an understanding of the functionality of the EMS aboard.

Observations with Recommendations

1. Section 11 of the EMM details the procedure for crewmembers to report environmental concerns and to remain anonymous if so desired. The conventional anonymous reporting boxes initially installed on other vessels were no longer in use. Crewmembers may report such concerns by calling a toll free telephone number, anonymous reporting email or anonymous reporting letter by post mail. The procedure is also mentioned in the Code of Ethics booklet on board accessible to all crew members at common areas in addition to posters displayed in common areas e.g. mess rooms, CCR, ECR etc. The crew members were aware of the existence of the information, but during interview some of them were not very clear about the intent of the procedure and under what circumstances they may follow the procedure outlined. Recommend that further training be conducted by the management to ensure all crew understand the procedures to report the required information.
2. Included in the recently implement EMM is a Declaration of Environmental Commitment, Form ENV 020 (copy attached). Some completed forms were aboard; however, not for all crew members. Procedures for the implementation of the form are contained in Chapter 10, however, are not very specific with regard to the filing, i.e. copy to be filed on board. In this regard, the instructions for completion and filing of this form, contained in Section 10.4, need to be revised.
3. Noted the OWS discharge sample line was not painted. The Scope of Work requires that the sample line be painted a bright color to distinguish it from other tubing in the area. Recommend the staff should follow the company guidelines using a distinguishing color to paint the sampling lines and Ionia Management revise their instructions to the fleet to make it consistent within the fleet.
4. The ORB Part 1 indicates monthly testing of the OWS, as required by the Scope of Work and the EMM Section 5.17 is being carried out. The Chief Engineer was not familiar with the review of the memory card to verify the test procedures record. The test records were not made available. It is recommended that the Chief Engineer and his staff be trained in the right procedures to perform fully operational tests and Ionia Management revise the EMM procedures contained in Section 5.17 and provide additional guidance as necessary to ensure that a full operational test is carried out, including testing of the oil purge valves. Also, item 8 of the current procedure requires oily water or an appropriate testing fluid be run through the 15-ppm bilge alarm monitor. The OCM was tested by introducing a mechanical obstruction. Recommend guidance be issued on how to introduce oily water through the OCM, as this would be a more effective test of the unit.



5. The Oil Transfer Procedures, required by 33 CFR 155.720, are not in full alignment with the regulations. Recommend the procedures be amended to include specific citing of these regulatory requirements.
6. A flexible hose inventory is kept, with hoses stored in the forecastle. There are, however, no details on tags or labels to identify each hose except just the numbers allocated painted on them. Recommend the hoses be identified with number, diameter and purpose of use on the label to ensure they are properly controlled and accounted for and the inventory list posted at the location.
7. SWOMS data for tank soundings was compared against manual tank soundings. The following table shows the results. The data was taken from form ENV 024:

Date & Time: GMT 2100, 07/Sept/2010, Jebel Ali in port							
	A	B	C	D	E	C - E	C-E/C
Tank	Cap. (m ³)	Manual (cm)	Manual (m ³)	SWOMS (cm)	SWOMS (m ³)	Diff. (m ³)	% Diff. (m ³)
Clean Bilge	32.21	1.16	13.45	0.94	10.03	3.42	25%
Dirty Bilge	32.49	0.72	7.56	0.40	3.41	4.15	55%
Bilge Oil	11.89	0.65	1.47	0.86	2.34	0.87	-59%
Incinerator		0.92	1.16	0.56	0.61	0.55	47%
FO Sludge	11.89	0.98	3.25	0.10	0.09	3.16	97%
LO Purif. Sludge	4.56	0.29	1.52	0.17	0.92	0.6	39%
FO Purif. Sludge	7.98	0.14	1.48	0.10	1.04	0.44	30%
FWD Port Bilge*	----	28	0.42	4	0.06	0.56	86%
FWD STBD Bilge*	----	14	0.35	59	99.99**	???	???
Aft Bilge well*	----	10	0.5	8	0.61	0.11	-22%
Date & Time: GMT 2100, 08/Sept/20101 Jebel Ali in port							
Tank	Cap. (m ³)	Manual (cm)	Manual (m ³)	SWOMS (cm)	SWOMS (m ³)	Diff. (m3)	% Diff. (m ³)
Clean Bilge	32.21	1.16	13.45	118	13.85	0.40	-3%
Dirty Bilge	32.49	0.97	11.93	40	5.65	6.28	53%
Bilge Oil	11.89	0.65	1.47	86	2.36	0.89	-61%
Incinerator		0.89	1.12	1	1.29	0.17	-15%
FO Sludge	11.89	0.98	3.25	10	0.09	3.16	97%
LO Purif. Sludge	4.56	0.3	1.54	17	0.92	0.65	40%
FO Purif. Sludge	7.98	0.14	1.48	10	1.07	1.41	28%
FWD Port Bilge*	----	39	0.62	4	0.06	0.56	90%
FWD STBD Bilge*	----	14	0.35	59	99.99**	???	???
Aft Bilge well*	----	20	1.01	15	0.76	0.25	25%

* Bilge total capacities are not known

** It appears there is an error



Incinerator Service tank is not included in IOPP certificate.
Figures in red indicate negative values.

The above soundings were taken by the oiler and the C/E. The vessel was in port, therefore there was no movement of the vessel to affect the soundings. While on a percentage basis the differences between the manual soundings and the SWOMS data appear significant, in some cases compared to total capacity of the tank the percentage amount of difference relative to the size of the tank is not. To ensure manual soundings are as accurate as possible, it is recommended that the procedure for taking soundings include taking more than one manual soundings each time while the vessel is at sea and recording the average or median value. The shore technician for the SWOMS system was on board at Jebel Ali on the September 07/08, 2010, for calibration and servicing the unit. (Copy of the report attached). The Dirty LO tank and Dirty FO tank contain mainly leakage collected and are not included on the Supplement to the IOPP Certificate or SWOMS. As per the C/E the accumulated quantities are usually transferred to FO Tank for re-use.

8. The VGP requirements are not fully implemented as yet on the vessel and implementation is in progress. It is recommended that the management expedite implementation and training of the staff prior vessel's arrival US ports.
9. The Fleet Engineering Survey, Form ENV 015 was completed by an engineering officer on March, 18, 2010. The form ENV 015 showed an effective date as 15/10/2010 Revision 1. (Please note that the audit date was September 07-10, 2010.) It is recommended that the discrepancy of survey day prior to effective date should be corrected.
10. There was no objective evidence found on board of pre-joining training for the staff of Environmental Awareness of needs arising out of Scope of Work. It is recommended that the management develop specific training programs for the manning centers in Philippines with copies of training material on board and copies of certificates for the crew trained prior joining the vessel.
11. The floor plates covering the Emergency Bilge suction and bilge cross-over valves were not painted as recommended in Scope of Work. It is recommended that they should be painted by distinctive orange paint, with 3" wide lettering and should be consistent with other vessels in the fleet. (Photos attached).

Observations Without Recommendations

1. I observed various engine room pumps and machinery in operation during the period of time the vessel was alongside, underway, at anchorage. The engine room was observed to be in very clean condition. No leakages were noted from the main engine. 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 oily residues. 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 dumped into the Bilge oil tank to avoid contamination of the



Dirty and/or Clean Bilge Tank. The bilge wells contained only small quantities of clean water. The Clean bilge tank was last cleaned on April 05, 2010. No leakages were noted from operating cooling water and general service pumps and there was no evidence of leakages from pumps. The accumulation of fresh water in the bilge wells appeared to be due to condensation on pipes from the main engine air cooler. (Outside temperature 45°C, sea temperature 37°C and relative humidity well over 90%). Based on review of the ORB bilge well transfer entries and the Sounding Log, bilge loading is minimal of about 100 liters per day. 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. Attached are photos showing the condition of the ME and auxiliary engines.

2. Similar to the engine room, both the cargo pump room and steering gear room were noted to be very clean, with no apparent leakages from pumps or pipes.
3. 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 with the attending superintendent. Instructions contained in the manufacturer's manual were used to perform the tests, with values for ship speed, PPM, and flow rate manually entered. 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. The ODME was tested as per makers test procedure. The high PPM and 30 liters/nm exceeded alarms were tested. 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 assisted by the pump man.
4. The manifold trays on deck on either side to contain any leakages or drips during loading, discharging and disconnection of shore connections are adequate relative to the requirements. The vessel had two portable Wilden Pumps, one for'd and one aft of the cargo areas of the vessel for use in case of an oil spill on deck during cargo operations and one spare. FO vent containment, bunker line containment and sludge discharge containment are adequate and meets the U.S. Pollution Prevention Regulations.
5. A monthly 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. The vessel maintains a Sounding Log as required by Section IV and Attachment B to the Scope of Work. Excerpts of the Log Form ENV 008 for July and August 2010 are attached. The form of the Sounding Log was recently revised to include the initials of the deck officer witnessing the taking of the soundings as required by the Scope of Work.
7. A test of the incinerator burning sludge was carried out on September 09, 2010. 205 liters of sludge from the WOST were incinerated, at a rate of 37.3 liters/hour. Test table attached. Rated capacity as per specifications is 65L per hour for liquid.



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

No.	Date 2010	Quantity m ³	Time in hrs.	Rate liters per hr.
1	Sept 03	0.11	2.5	44.00
2	Sept. 03	0.64	15.0	42.66
3	Sept. 01	0.35	11.5	30.43

The vessel generates about 370 liters of sludge per day. Daily fuel consumption is rated at 38.00 mts per day for a nominal speed of 14.5 kts. Attached Chief Engineer's Weekly Report, Form ENV 009 covering the period from 30/08/2010 – 05/09/2010. Sludge tank capacity, according to the Supplement to the IOPP Certificate, is 48.8 m³. Sludge tank capacities and incinerator capacity appear sufficient to manage the storage and disposal of sludge.

9. The vessel is fitted with a sewage treatment plant (STP) made by Hamworthy type ST3A Super Trident with a rated capacity for BOD 3.0 kg per day. The capacity of sewage holding tank is 6.3 m³. 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 closed position, except during short periods of maintenance, while at sea, and only treated sewage is discharged. According to the C/E the system is adequate for the complement of the vessel, though the model type does not indicate capacity in terms of number of persons on board. The present complement during the audit was 27 persons.
10. An operational test of the OWS was carried on September 09, 2010. Prior to OWS test all the bilge alarms were tested. A section of the pipe adjacent to Overboard discharge valve was opened for inspection. The valve end and pipe ends were found clean and free of oil. A certificate signed by the Auditor and the Chief Engineer was posted on the pipe for future reference. Copies of the certificates were attached to ORB and E/R log book. The re-circulation test was carried out for a period of 15 minutes. During the test the OCM was tested for over 15ppm alarm and the function of three-way valve. All were found functioning satisfactorily. Subsequently the test of OWS was carried out with over board Discharge valve (skin valve) open for a period of one hour. The source tank soundings were monitored by the Auditor. Samples were taken every 15 minutes of incoming and outgoing effluents (photos attached). The outgoing samples were found to be clean and free of oil. The OCM readings were monitored during the test and the reading showed zero ppm throughout the test.



Time10/Sept/10	Sounding	Quantity in m ³
0955	115	13.25
1010	111	12.25
1025	107	11.80
1040	103	11.35
1055	100.5	10.90

Rate given was 2.35 m³ per hour in comparison to 5.0m³ per hour in the specification.

11. The rated capacity of the OWS is 5 m³ per hour, which appears to be more than adequate for the currently generated machinery space effluents. According to the ORB, the last three operations of the OWS were as follows:

No.	Date 2010	Quantity in m ³	Time in hrs	Rate m ³ /hr
1	Sep. 01	1.23	2.00	0.615
2	Jun. 25	11.75	4.50	2.61
3	Feb. 26	7.98	3.60	2.21

The rates obtained in the past were well below the rated capacity of 5.0m³ per hour. C/E was requested to investigate the capacity of the pump and any other probable causes for low rate.

12. As per the Scope of Work requirements, samples of the following were taken during the test for content analysis by management nominated laboratory in Greece.
- Bilge Well Aft
 - Clean Bilge Tank
 - BW Fwd Starboard
 - OWS Discharge

All samples taken were appropriately packed and dispatched to the laboratory in Greece for analysis from Sitra, Bahrain. No seals were posted at the time as the samples were stored in special freeze bottles given by the lab. A copy of the landing certificate is attached.

13. A log of incinerator and OWS operations is maintained. All alarms are recorded on the ECR console print out.
14. The vessel has a Deckma OCM, model OMD 2005, which conforms to requirements of MEPC 107(49). The OCM was last calibrated on May 01, 2010. The copies were sighted in the Master's certificate file and with C/E. The Scope of Work requires recalibration at least annually, with copies of the certificates maintained on board.



15. 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.
16. Daily checks of the Enviro Logger are being carried out and recorded on Form ENV 024. See attached samples.
17. The present engineering staff comprised of C/E, 2/E, 3/E, 4/E, two oilers, one engine cadet and an electrician, and appeared adequate to handle the operational, maintenance and repairs workloads for the systems, equipment and components on board. All the staff appeared to be professional and knowledgeable with relevant experience for the job allocated. They are fully aware of the effort needed to minimize the waste streams development. The vessel is certified for UMS operation and manned as per company guidelines. In port and during cargo operations the Engine room is continuously manned as and when required.
18. Weekly shipboard training, which includes safety, security and environment protection, is carried out as per the six-month training schedule. Attached is a copy of the schedules for 2010. The dates when training is conducted are noted. In addition, environmental training is also carried out during monthly Safety Committee Meetings. Currently CBT training by VIDEOTEL has been introduced on board. The CBTs are of general nature and not necessarily specific to the environmental awareness related to the violations of US environmental rules.
19. The vessel had all the manuals of equipment related to waste stream and type tested certificates. Schematic diagrams and pipeline diagrams were on board. Attached are copies of the sanitary and bilge piping diagrams.
20. A new Garbage Management Plan was received with revisions to storage, segregation of Hazardous waste management was received at Jebel Ali and implementation is in progress to meet the requirements of the new manual.
21. Ionia Management has an effective internal environmental auditing procedure in place. Attached is a copy of the Internal Environmental Audit Report, Form ENV 011, for the audit conducted on March 26, 2010. The audit report is very detailed and comprehensive. Five non-conformities were identified and were in the process of being corrected at the time of this audit. The non-conformities were as follows: Quote"
 - I. According to the company's requirements a spare starter for OWS pump, rotor bearing and sealing and filtering should be available onboard. However the relevant spares were not available.



- II. There was no record onboard indicating that the OWS was being maintained to the manufacturer's instructions.
- III. During the audit with the Chief Engineer and the Master it was established that the vessel's Seal log book and spare Seal log book were not available onboard and therefore were not implemented eventually. It was also observed that although a tag system had been established satisfactorily, the new seals as required by the company were not yet available on board.
- IV. There was no evidence that visitors boarding the vessel are made aware of the company's environmental policy and requirements upon their arrival onboard. In addition there were three observations. Some of the non-conformities were closed and others are in the process of closing on completion of corrective/preventive actions. "Unquote.

Conclusion

Overall condition of the vessel and waste management equipment is very good. This vessel has recently come under the Scope of Work as management intends to use the vessel on US route in the future. Some of the issues mentioned above are having early challenges, which will be sorted out as soon as possible through the commitment of the management to the EMM and US requirements as noted previously, despite the number of Observations with Recommendations outlined above. The Scope of Work and EMM requirements are well implemented on board. Having audited two vessels namely M/T Theo T and M/T Fidias previously, it is noteworthy to record that all the recommendations from previous audits have been implemented and the Environmental Management Manual and other relevant documentation have been revised to reflect the same. All the personnel on board cooperated fully during the audit and were sincerely interested and positive in complying with the environmental procedures. The presence of superintendent Captain Dimou, Aristeidis, from Safety and Quality department during the audit was an indication of the commitment of the management to ensure better environmental performance.

Respectfully submitted by:
Subhash Joshi
Compliance Systems Inc.

Enclosures:

- 01. Ship's particulars
- 02. Crew list
- 03. Chief Engineer's weekly report for a period from 30/08/2010 to 05/09/2010
- 04. Internal Environmental audit report for on-conformities and observations, 26/03/2010
- 05. Fleet Engineering Survey, 18 March, 2010
- 06. Internal Environmental Audit report, 26 march, 2010
- 07. Enviro logger check list for 06/09 to 08/08, 2010
- 08. Landing form IM/GSPPLF/02.2004 for samples sent ashore for analysis
- 09. Piping diagram of Bilge, Fire and GS system
- 10. Extract from ORB I for 30/08/2010 to 06/09/2010
- 11. Extract of daily sounding log for months of July and August, 2010



12. List of last six cargoes
13. Inventory of Deck & Engine room Flexible Hoses Form ENV 010 dated June 30, 2010
14. Drill program for 2010
15. Instruction page from Spare Seal Inventory Log
16. Enviro logger/vigilante service technician's report September 05,2010
17. ODME calibration and test report dated12/05/2009
18. Poster giving details of CCM's Role
19. Poster for Anonymous Reporting Procedure
20. Table 1 – Vessel Movement
21. Table 2 – Personal Timetable
22. Table 3 – Details of WSM Equipment On Board
23. Details of Certificates, Inspections, and Manuals



Environmental Management System (EMS) Audit Checklist

This document and all of its contents is confidential. It should not be copied, retained, or distributed unless authorized by Compliance Systems, Inc.

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2. Audits	10. Sounding Log	18. Sewage Waste Stream
3. Certificates	11. Oil Transfer Procedures	19. Hazardous Waste
4. SOPEP Manual	12. Standard Discharge Connection	20. SOPEP Gear
5. VRP's	13. Overflow Discharge Containment	21. Ballast Water Management
6. Drills, Training & Familiarization	14. Prohibited Oil Spaces & Oil Accumulation Spaces	22. Additional Environmental Items
7. Oil Record Book	15. Bilge Water Management	23. General Comments and Observations
8. Garbage Management Plan	16. Seal Management Program	

1. Vessel Details

Vessel Name	M.T. PLOUTOS	IMO#: 9327023
Port	Jebel Ali, Dubai → Sitra, Bahrain	
Agent	BARWIL	
Date	Sept 07 → Sept 11, 2010	
Master	VESTARCHIS STYLIANOS	
Auditor (S)	SUBHASH JOSHI	
Cargo	GASOLINE	
TOB:	Sept 07 at 0830.	

**2. Audits**

Type of EMS audit:

Initial ☐Ongoing ☒Final Audit ☐

Date of last ISM Internal Audit	Sept. 13, 2009	
Are there any outstanding non-conformities?		N
If there are non-conformities outstanding, do they relate to the EMS?		N
Has the vessel ever had an environmental audit? If so, list date:	MARCH 26, 2010	
Date of last ISM External Audit?	Sept. 16, 2009	
Did the review of the vessel's Safety Management System (SMS) reveal any unresolved occurrence reports relating to environmental systems? If so, explain.		IX

3. Certificates

International Oil Pollution Prevention (IOPP) Certificate					
Date of Issue	Feb 12/08	Date of Expiry	Dec 14/11	Issuing Authority	BV
Incinerator Capacity	65 t/hr	OWS Capacity	5.0 m ³ /hr		

International Sewage Pollution Certificate					
Date of Issue	Feb 12/08	Date of Expiry	Dec 14/11	Issuing Authority	BV
Tank Capacity	6.3 m ³				

International Air Pollution Prevention Certificate					
Date of Issue	Feb 12/08	Date of Expiry	Dec 14/11	Issuing Authority	BV

**4. SOPEP - Shipboard Oil Pollution Emergency Plan / Ref: MARPOL Annex I/26.1, 33 CFR 151.26**

	YES	NO
Date SOPEP approved by Administration or Class Society	May 14/2009	BY
List date of latest Annex II Contact List	June 30, 2010	
What is the official working language of the crew?	English	
Correct contact numbers for Company, National, and Local authorities	Y	
Comments:		

5. Vessel Response Plans (VRP) - Ref: 33 CFR 151.26, 29a; 33 CFR 155.210, 205, 235, 430

Is the OPA-90 tank vessel/non-tank vessel VRP current and USCG approved?	Y	
Date of approval:	Feb 12, 2009	
Does vessel have any State VRP's?		
State(s): California	Date of approval: March 28/2008	

**6. Pollution Drills and Training Records, and Familiarization** - Ref: 33 CFR 155.1055 and .1060

	YES	NO
Has all crewmembers received environmental awareness training prior to joining the vessel? *	✓	
Has the crew, upon joining the vessel, been provided with instructions or details on how to provide anonymous reports to the Company, Designated Person Ashore, or the Environmental Compliance Manager?	✓	
Are notices posted throughout the vessel to inform the crew on how to report issues of Environmental non-compliances with the EMS or ECP?	✓	
Has the Master, within seven days of assuming command, performed environmental training and/or awareness with the crew?	✓	
Review the Master's handover notes. Does it reflect or mention the environmental status of the crew or equipment onboard? Does it list any unused seals? <i>yes.</i>		✓
Review the Chief Engineers handover notes. Does it reflect or mention the environmental status of the crew or equipment onboard? Does it list the spare parts for the Incinerator, OWS, and other pollution prevention procedures or equipment?	✓	
Review of handover notes for all senior personnel including the Bosn and electrician.	✓	
Does the familiarization checklist onboard identify: Environmental Policies <input checked="" type="checkbox"/> , Awareness <input checked="" type="checkbox"/> , Reporting Procedures <input checked="" type="checkbox"/>	✓	
Has the engineering crew have documentation of environmental training on a regular basis: Monthly <input checked="" type="checkbox"/> , Semi-annually <input type="checkbox"/> , Annually <input type="checkbox"/> . <i>New Joiners</i>	✓	
Date of last bunker spill drill? <i>July 24, 2010</i>		
Date of last environmental drill other than bunker spill? Location: <i>Aug 18, 2010, coll. 13 bunker Tank rupter</i>		
Are pollution drills being conducted according to drill schedule?	✓	
Are QI notification drills conducted according to Federal, and State regulations?	No Record	
Is pollution prevention training conducted before bunker transfer?	✓	
Are training records being maintained for three years?	✓	
Comments: * As per Company Supdt. yes but no objective evidence was on board.		

7. Oil Record Book (ORB) - Ref: MARPOL Annex I/20, 33 CFR 151.25

Are all entries legible and <u>signed</u> by the officer making the entry	✓	
Each completed page signed by the Master (after page is filled)	✓	
Book maintained on board for 3 years, or as required by the ECP	✓	
Do all entries contain at least the information required by the category code under which the entry was made	✓	
Is the quantity of sludge being incinerated equal to or less than the rated capacity of the incinerator for the time the incinerator was operated	✓	
Compare the tank size to the amount transferred with the amount of waste stream treated. Is this consistent with the actual operation of the OWS?	✓	
When bilge water is removed from a holding tank, do the recorded quantities match the quantities previously recorded as being pumped into the tank	✓	
Do all bilge water movements that are recorded tally correctly?	✓	
If bilge water has been transferred to a shore-side facility or to a slop barge, does the quantity and date recorded on the receipt match the information in the ORB?	✓	
Are receipts for bilge slops transferred ashore or to a slop barge attached to the ORB page where the entry is recorded?	✓	
Are there identical entries or similar entries for recorded operations of the OWS or incinerator that cause suspicion		✓
Is evaporation or draining of water from the incinerator waste oil tank being recorded in ORB	✓	

H 27. Date, location, and amount of bunkers taken. D.O. or I.F.O.	28 June 10 Gibraltar FO 1491 mts
H 27. Date, location, and amount of bunkers taken	22 Apr 10 Piraeus FO 800.00 mts
H 27. Date, location, and amount of bunkers taken	28 Mar 2010 Ro-Ro Hamburg F.O 1220 mts DO 100.5 mts
D 15.1 Date, total time or operation, and quantity of OWS discharged.	01 Sept. 1.23 m ³ 2 hrs
D 15.1 Date, total time or operation, and quantity of OWS discharged.	25 June 10 11.75 m ³ 4 hrs 30 mts
D 15.1 Date, total time or operation, and quantity of OWS discharged.	26 Feb 10 7.98 m ³ 3 hr 36 m
D 15.3 Bilge water transferred to holding tank.	6 Sep 10 3.34 m ³
D 15.3 Bilge water transferred to holding	29 Aug 10 1.01 m ³



tank.	
D 15.3 Bilge water transferred to holding tank.	19 Aug 10 0.91 m ³
C 12 Date, location and quantity of oil disposal If incinerated list time and quantity	03 Sep 10 0.11 m ³ 2.5 hr
C 12 Date, location and quantity of oil disposal If incinerated list time and quantity	02 Sep 10 0.64 m ³ 15.0 hr
C 12 Date, location and quantity of oil disposal If incinerated list time and quantity	01 Sep 10 0.35 m ³ 11.5 hrs

Are there any Codes:

F: Condition of Oil Discharge Monitoring and Control System**G: Accidental or other exceptional discharges of Oil****I: Additional Operational Procedures and general Remarks.**

✓

✓

✓

Are there any Codes:

Are there any remarks or entries that are not normally identified in the ORB?

No

No

**8. Garbage Management Plan (GMP)** -Ref: 33 CFR 151.63; MARPOL Annex V/9, V/3; 7 CFR 330.400

	YES	NO
Is there a Garbage Management Plan (GMP) on board?	Y	
Who is listed as the GMP Officer?	C/O	
Are designated crewmembers familiar with Plan?	Y	
Is there documented evidence of Garbage Management training?	Y	
Is shipboard garbage properly handled IAW Garbage Management Plan?	Y	
Are plastics segregated from other waste?	Y	
Are waste containers provided and securely covered?	Y	
Garbage containers located within the vessel with non-combustible sides and bottom?	Y	
Garbage Record Book entries correct: Type, amount, location, date/time <input checked="" type="checkbox"/> Errors lined thru, initialed, corrected - no white out used <input checked="" type="checkbox"/> Each entry signed by PIC and each page by Master <input checked="" type="checkbox"/> Reports of inadequacy of port reception facilities for garbage on file <input checked="" type="checkbox"/> NO	Y	
Is the Garbage Record Books maintained onboard for the past 2 years?	X	
	X	
Is the incinerator being used to burn garbage?	Y	
Is there any evidence that plastics or synthetics have been discharged overboard?		N
Is waste sorted to prevent hazardous waste entering non-hazardous waste stream or incinerated? Are there separate defined storage areas doe hazardous /non-hazardous - no commingled waste?	Y	
Signage/placards in working areas of crew in the official working language?	Y	
Incinerator ash if discharged overboard free of plastic residue or free of unburned food wastes if landed ashore. Not discharged O/B		X
Are trash chutes clean, free from oil residue (no oil stains on decks, side of hull adjacent to trash chutes)?		N/A
Are foreign food wastes handled per APHIS regulations?	Y	
Are medical wastes incinerated or manifested as bio-hazardous waste?	Y	
Garbage discharged outside special areas. as per rules	Y	
Incinerator operation observed?	Y	
Garbage Pollution Placards posted?	Y	
Procedures to minimize amount of potential garbage in place		
• Is vessel encouraging ship suppliers to consider alternate means of packing - use of other than plastic	X	
• Is vessel reusing packing (examine stockpiles)	Y	
• Is waste generated in port disposed to shore reception facilities prior to sailing	Y	



Compliance Systems Inc. Environment Management System Audit Checklist

Is there a recycling program onboard?	<input checked="" type="checkbox"/>	
Does the vessel have procedures/policy for recycling?	<input checked="" type="checkbox"/>	
Is ship's crew following recycling procedures/policy?	<input checked="" type="checkbox"/>	
Is maintenance being carried out on equipment – e.g. incinerator, grinders	<input checked="" type="checkbox"/>	
Are records maintained and manifests completed for potential hazardous waste streams: used solvents <input checked="" type="checkbox"/> ; paints and thinners <input checked="" type="checkbox"/> ; fluorescent/mercury vapor bulbs <input checked="" type="checkbox"/> ; batteries (NiCad, Lead Acid, Lithium, Alkaline) <input checked="" type="checkbox"/> ; pharmaceuticals/narcotics <input checked="" type="checkbox"/> ; aerosol cans <input checked="" type="checkbox"/> ; expired pyrotechnics <input checked="" type="checkbox"/> ; incinerator ash if contaminated with toxic/hazardous substances (plastics containing heavy metals) <input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
Is there evidence that hazardous wastes are being incinerated, diluted, neutralized, or evaporated as a means of disposal		<input checked="" type="checkbox"/>

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**9. Oily Water Separator (OWS)** - Ref: MARPOL Annex I /16; 33 CFR 155.380(b)

Request the chief engineer to provide a line drawing of the oil waste stream system which includes the OWS, bilge piping, bilge main cross connections and holding tanks. Compare drawing to installation and attach drawing to report.

	YES	NO
Is the OWS operational?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
OWS Capacity: <u>5.0 m³</u> , Approval number & date: <u>attached</u>		
Is the manufacturers manual for the OWS and OCM correct and readily available? List locations: <u>C/E</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
List the date the Oil Content Monitor was last calibrated?	<u>May 01 / 2010</u>	
Is there a circular or policy to indicate how often the OCM is to be recalibrated? Semi-annually <input type="checkbox"/> , Annually <input checked="" type="checkbox"/> , Every Five Years <input type="checkbox"/> , Other <input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Was the OCM calibrated by a shore facility or onboard by the ship's crew?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Date the OWS was last opened for inspection and/or cleaning	<u>Mar 25 / 10</u>	
Is there documentation the person operating the OWS has received familiarization and operation training?	<u>Jan 25 / 2010</u>	
How often is the OWS training being conducted and by whom? <u>C/E quarterly</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Are there clear and precise operating instructions posted for: valve alignment, pressure settings, heating, resetting, accidental discharge and securing?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Does the OWS automatically re-circulate (3-way valve) or shut down when the 15ppm level is reached?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
No modifications to bilge piping, IAW approved plan, direct to OWS or holding tank	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Has the OWS overboard pipe been previously removed for inspection or cleaning? Dates: <u>carbon</u>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Has the coaleser filter been changed in according to the Safety Management System? Dates: <u>March 25 / 2010</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
How many spare coaleser filter sets are onboard? <u>Two sets</u>		
Was the OWS system placed in operation during the course of this audit? 15 Minutes <input checked="" type="checkbox"/> , 30 Minutes <input type="checkbox"/> , 1 Hour <input checked="" type="checkbox"/> , <input type="checkbox"/>		
Operational test satisfactory; system operating in published ranges	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Operator competent and knowledgeable of operation (CE and 2AE)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
15 PPM Oil Content Meter and alarm tested satisfactory	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Does unit have multiple Oil Content Meters; if so, are reading consistent	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Unit processing contaminated source verified (Unit should be operated for at least 15 minutes to identify reduction in contaminated source)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sample analyzed by meter is OWS output (Trace sample line for presence of unacceptable clean water connection)	<input checked="" type="checkbox"/>	<input type="checkbox"/>

* 15 min in re-circulation

1 hr at sea with OVB D skin valve cap



No electrical bypasses, jumpers, extra switches on or within unit or Meter control panel		N
If the flushing line is left open position will the OWS continue to operate?		N
System back flush or oil purge cycle operates properly	X	
Is the flushing system on the OWS keyed? <i>yes CMD 2005</i>	Y	
Is the freshwater flushing line to the Oil Content Monitor painted a bright color?	Y	N
Seal at the end of the flushing line.	Y	
Is there any evidence of tampering or additional connections to the flushing line?		N
Is the OWS overboard valve secured by seal or lock? If locked, who has possession of the key? <i>C/E</i>	Y	
Are the sufficient supplies OWS coalescer filters? List ROB quantity: <i>Two sets</i>		
Is there a list of approved chemicals approved by the OWS manufacturer for use in the OWS?	Y	
Are all OWS alarms documented in the ORB? <i>Only in Data logger</i>		N
Is there evidence that two (2) non-crew engineers have independently tested the OWS and logged in the ORB?		N
Date of test:		
Duration of test:		
Is the emergency bilge suction valve labeled, numbered and sealed?	Y	
Review hand over notes for the chief engineer, second engineer ensuring the installed pollution prevention equipment status is properly addressed.	Y	
Review logbooks relating to fuel oil and lube oil management, to the operation of the fuel oil and lube oil purifiers and line or piping failures.	Y	
Comments:		
<ul style="list-style-type: none"> Visually sample processed water for gross contamination (sheen or visible oil) <input checked="" type="checkbox"/> Compare ship's operational maintenance routine with actual preventative maintenance conducted <input checked="" type="checkbox"/> Request proof /documentation of maintenance completed (used consumables from OWS, receipts service, technician reports, contractor disposal records) <input checked="" type="checkbox"/> Review meter calibration records <input checked="" type="checkbox"/> Review strip charts if fitted <input checked="" type="checkbox"/> Examine other machinery pace overboard piping for unusual connections <input checked="" type="checkbox"/> Review records pertaining to system repairs <input checked="" type="checkbox"/> Consider opening access cover to first and second stage chamber for inspection in internal condition <input checked="" type="checkbox"/> <i>No</i> Consider removing first section of piping upstream of OWS overboard valve – inspect for 		



oil residue <input checked="" type="checkbox"/>
• Look for piping modifications that are not shown on original vessel drawings that would facilitate discharge of bilge water around Oil Content Meter <input type="checkbox"/> <i>None</i>
• Check zero and calibration function & last dates of service for the OCM or OCD <input checked="" type="checkbox"/>
• Test operate OCM/OCD <input checked="" type="checkbox"/>
• Test Oil Detection Probe & auto/manual drainage of oil in OWS chamber <input checked="" type="checkbox"/>
Comments:

10 Sounding Log

Are the sounding logs completed daily and initialed by the certifying engineer?	<input checked="" type="checkbox"/>	
Where is the Sounding log maintained?	<i>E/R</i>	
Are entries written ink, pencil, or both?	<i>Ink</i>	
How long is the Sounding log to remain onboard?	<i>3 yrs</i>	
Is it documented at what times of day sounding are to be taken?		<input checked="" type="checkbox"/>
Who is designated to take the soundings?	<i>Not mentioned</i>	
Does the Master sign the Sounding log on a weekly basis?	<input checked="" type="checkbox"/>	

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**11. Oil Transfer Procedures and Operations** - Ref: 33 CFR 154.500, 155.700-.720, 155.750, 155.785, 155.790, 155.800, 155.805, 155.820, 155.1010, 155.1030, and 156.170

	YES	NO
Oil Transfer Procedures posted and available in crew's language <i>for large</i>	<i>y</i>	
Description of transfer system, including a line diagram of piping system (pumps, vents, valves, alarms, shutoffs, etc.)	<i>y</i>	
Person in Charge fluent in English or language mutually agreed upon w/ shore side PIC	<i>y</i>	
Format in CFR order or cross reference index page		<i>N</i>
List/description of products carried by vessel <i>attached</i>	<i>y</i>	
Declaration of Inspection (DOI) available and retained for at least one month 33 CFR 156.50		<i>N/A</i>
Number of persons required on duty during transfer	<i>6</i>	
Duties listed by title of each person	<i>y</i>	
Two-way means of communication available	<i>y</i>	
Procedures to top off tanks and disconnect	<i>y</i>	
Procedures to report oil discharges	<i>y</i>	
Emergency response procedures outlined	<i>y</i>	
Is lighting at each transfer operations work area adequate and properly shielded	<i>y</i>	
Oil Pollution Placard posted (most recent U.S. placard) 33 CFR 155.450	<i>y</i>	
Has the pollution prevention equipment prepared in advance and is the portable pump rigged for operation?	<i>y</i>	
Has the bunker line been tested in accordance with 33CFR 156.170(c)(4)	<i>y</i>	
Has a pre loading plan been completed (Washington)		<i>N/A</i>
Is condition of oil transfer hoses on board satisfactory		<i>N/A</i>
Are shipboard hoses marked with MAWP, Mfg. Date, test date)		<i>N/A</i>
Are hoses blanked off when not in use	<i>y</i>	
Is there a record of tests and inspections	<i>y</i>	
Comments:		



12. Standard Discharge Connection - Ref: MARPOL Annex I/19; 33 CFR 155.430

	YES	NO
Properly fitted <i>sealed.</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Is the blank flange securing the bilge and sludge transfer system shore connection discharge valve at the discharge stations sealed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>
Comments:		

13. Overflow Discharge Containment - Ref: 33 CFR 155.320

	YES	NO
Size adequate (<1600GT ½ bbl, >1600GT 1 bbl) <i>6.02 m³/each side</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Fixed around fuel/lube/sludge lines and vents	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Fitted with drains and plugs	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Scupper closures fitted on deck	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Comments:		

14. Prohibited Oil Spaces & Oil Accumulation Spaces - Ref: 33 CFR 155.470

	YES	NO
No oil or hazardous substances carried in a forepeak tank or tank forward of collision bulkhead	<input type="checkbox"/>	<input type="checkbox"/>
Are the following spaces clean and free of oil?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<ul style="list-style-type: none"> Tail shaft recess <input checked="" type="checkbox"/> Purifier room <input checked="" type="checkbox"/> Below boiler <input checked="" type="checkbox"/> Hydraulic pump rooms <input checked="" type="checkbox"/> Steering flat <input checked="" type="checkbox"/> 	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Comments:		

**15. Bilge Water Management** - Ref: MARPOL Annex I

	YES	NO
Is there contamination/oily residue in bilges on bulkheads, piping, structures, roseboxes?		N
Is there leakage from systems and engines into machinery spaces?		N
Is there evidence of recent cleaning of systems, equipment, and components?		N
Is there adequate tank capacity to store bilge waste?	Y	
Is there evidence of detergent usage (emulsions cannot separate in gravity separator and are likely to result in discharges over 15 ppm)?		N
Is there evidence of excessive water ingress from pump glands, seals, and valve glands?		N
List the quantity and location of any portable diaphragm or other portable pumps onboard? <i>2 on deck 1 in E/R</i>		
Are there hoses, fitting, and connections in areas where usage is unknown?		N
Are overboard bilge, bilge & ballast, and salt-water service valves locked or sealed?	Y	
Are blank flange assemblies associated with piping leading overboard (saltwater service, main engine raw water cooling and other systems) permanently secured, removed or fitted with numbered seals through the flange bolts?	Y	
Are deck plates, valve bodies and valve handles near or above the locations of cross connections painted and have proper signage?	Y	
No blank flanges, pipe caps, or dead ended valves or tees on inlet or outlet piping		N
Evidence of bolting/unbolting of associated piping segments		N
Recent paint on pipe segments to indicate illegal removal		N
<ul style="list-style-type: none"> • Examine machinery space bilges completely <input checked="" type="checkbox"/> • Check records for engine oil usage, quantities – where lost, consumed, in bilge <input checked="" type="checkbox"/> <i>CS/04/2010</i> • Check status of oily bilge water tanks – last cleaned, at capacity? <input type="checkbox"/> • Levels of tanks during inspection – high or low? <input type="checkbox"/> <i>partial</i> • If tanks near full, what are the vessel's processing plans <input checked="" type="checkbox"/> 		
Comments:		

**16. Seal Management Program**

Is there a seal management program onboard?	Y	
Who is in possession of the seal log and seals? <i>Master / C/E</i>		
Where seals are used are there more than one seal to secure the valve or flange?		N
Is there a procedure for documenting how and when the seal is to be renewed or changed?	Y	

17. Waste /Sludge Oil Incineration

	YES	NO
Is the Incinerator onboard and operational?	Y	
Incinerator Capacity: <i>65 l/hr</i> , Approval number & date: <i>C-11412</i>		
Is there a record of tests, maintenance, and inspection of the incinerator?	Y	
Who is designated to operate the shipboard incinerator? Is it documented? <i>2/E 10 May 10</i>		
Are there operating instructions for the complete operation of the incinerator, including the valve alignment, temperature settings, reporting and documenting?	Y	
Incinerator operates with sludge/waste oils?	Y	
Is there evidence of use (clean or dirty firebox)? <i>Dirty</i>	Y	
List the holding capacity of the Waste oil tank		
Transfer pumps operable? Test.	Y	
Transfer pump to sludge system, ashore or incinerator settling tank only; receipts.	Y	
Do the waste oil connections meet 33 CFR 155.430?	Y	
<ul style="list-style-type: none"> • Check status of sludge tanks – full/empty <i>partial</i> • Check to see if there are connections to bilge main or other areas ✓ • Review estimated quantities of sludge produced – normal or excessive (fuel sludge production can exceed 2% of total fuel used) ✓ • Inspect incinerator main burner, pilot burner & igniter for overall operational condition ✓ • Inspect condition of refractory. Look for signs of overheating ✓ • Test operate incinerator using waste oil if sludge temperature permit. Test safety cutouts, verify pressure gauges and thermocouples. • At minimum, test unit on D.O. ✓ <i>Full test carried out</i> • Determine incinerator ash disposal plan <i>as per Garbage Record</i> • Check C/E incinerator log book for operational hours and maintenance • Inspect waste oil tank – drain, heating coil, level gauge, thermometer, date last cleaned ✓ 		
Comments:		

**18. Sewage Waste Stream** - Ref: MARPOL Annex IV; 33 CFR 159.57, Ref: 33 CFR 159.65, NVIC 9-82, Ship's Safety Management System

	YES	NO
Is the Sewage Treatment Plant operational?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sewage System rated capacity: <u>2</u> Persons. Maximum crew capacity <u> </u> Persons		
IMO and/or USCG Approval number: & date: <u>attached</u>		
Is the system rated for more than the maximum allowed on the Safety Equipment Certificate? <u>No info.</u>	<input type="checkbox"/>	<input type="checkbox"/>
Are toilets, urinals, scuppers piped to sewage plan	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Is all drainage from medical (hospital) areas piped to sewage system	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Is system installed, maintained and operated IAW approved plans and mfg. specs	<input checked="" type="checkbox"/>	<input type="checkbox"/>
If a gray water holding tank is onboard, list the holding capacity.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Is the MSD direct overboard valve locked?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Are there SMS procedures for maintenance available? If so, are they being followed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Does the unit contain proper level of chemicals?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Are the chemicals used in the MSD approved by the manufacturer?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Are their sufficient chemicals on board?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Is the unit operating within the manufacturers design specifications? (Records)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Are their clear and simple operating instructions/manual available?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Are their records of maintenance and cleaning of unit?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Is there a nameplate with approval data posted on the unit?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
As there been any shore disposal, if so, reason. I.e.: dry dock	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Are there bypass piping arrangements fitted	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Does company have any procedures requiring record of discharge at sea	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Comments:		



19. Hazardous Waste - Ref: 40 CFR 262 and 264; 49 CFR 176: RCRA; ISM Code; Safety Management System

	YES	NO
Has there been training of responsible persons in hazardous waste disposal	<input checked="" type="checkbox"/>	
Is there evidence (e.g. lack of disposal records) of hazardous waste being discharged overboard		<input checked="" type="checkbox"/>
Are hazardous wastes being properly stored, maintained, labeled, and placarded	<input checked="" type="checkbox"/>	
Is hazardous waste being commingled		<input checked="" type="checkbox"/>
Does the crew have ready access to spill control and decontamination equipment	<input checked="" type="checkbox"/>	
Are MSDS sheets available for hazardous materials	<input checked="" type="checkbox"/>	
Comments:		

20. SOPEP Gear

	YES	NO
Is the onboard oil spill gear identified and inventoried" Sorbents <input type="checkbox"/> , Non-sparking hand scoops <input type="checkbox"/> , Shovels <input checked="" type="checkbox"/> , Buckets <input checked="" type="checkbox"/> , Containers suitable for holding recovered waste (12bbbs) <input checked="" type="checkbox"/> , Emulsifiers for deck cleaning <input type="checkbox"/> , Protective clothing <input type="checkbox"/> , Non-sparking portable pump with hose <input type="checkbox"/> , Scupper plugs <input type="checkbox"/> .	<input checked="" type="checkbox"/>	
Is the vessel fitted with Emergency Towing Gear?	<input checked="" type="checkbox"/>	
Comments:		

21. Ballast Water Management - Ref: 33 CFR 151.2045 and NVIC 7-04 (Change 1)

	YES	NO
Is the Ballast Water Management Plan (BWMP) approved by Class <i>BV</i>	<i>Y</i>	<i>Dec 14/09</i>
Does the BWMP identify: Particulars <input type="checkbox"/> , Piping Plan <input type="checkbox"/> , Ballast Pump Details <input checked="" type="checkbox"/> , Sampling Points <input type="checkbox"/> , Training <input checked="" type="checkbox"/> , Exchange Procedures <input type="checkbox"/> , Safety Precautions <input checked="" type="checkbox"/> , IMO Guidelines <input checked="" type="checkbox"/> , Handling Log <input checked="" type="checkbox"/> , BWM Officer <input type="checkbox"/>	<i>Y</i>	
Where is the BWMP kept onboard?	<i>CCR</i>	
Is the BWM officer familiar with the BWMP?	<i>Y</i>	
Does the vessel maintain an updated and accurate BW Log? <i>26 Aug 10</i>	<i>Y</i>	
For the port of arrival, was a Ballast Water Report completed and submitted to the proper agencies? <i>Last report - 29/06/10 Rotterdam</i>		<i>N</i>
Are the BW Reporting Forms being properly completed?	<i>Y</i>	
Are the BW Reports from previous ports kept onboard for two years?	<i>Y</i>	
Has the vessel recently undergone a Ballast Water exam by Port State Control?		<i>N</i>
Is the vessel equipped to treat ballast water or transfer ballast ashore?		<i>N</i>
Comments: <i>Last BWM Training 24 July 2010</i>		

**22. Additional Environmental items**

Date of last engineering plant analysis of bilge egress, fuel and lube oil sludge development and pollution prevention equipment	<input checked="" type="checkbox"/>	
Notes on analysis	<input checked="" type="checkbox"/>	
Has there been any recorded extraordinary operation such as the need for frequent draining of fuel oil service and settling tanks and engine lube oil sump tanks?		N
Note any records of problems relating to this issue such as waxing, compatibility, stratification or contamination; with explanations, below:		N
Records of a pipe/line or a component on a fuel, lube oil or waste oil system failures noted by senior engineer with his/her signature. Records should indicate the reason for the failure and the quantity released as well as unintended releases of quantities of water, salt, fresh, condensate or cooling system. Comments:		
Review logbook for equipment having oil-to-sea interfaces, e.g. stern tubes, bow or stern thrusters, stabilizers, GPP or any other equipment where a leaking seal may cause a loss of medium into the surrounding waters of the vessel. Explanations of losses must be included in the logbook and signed by the senior engineer. Comments: <i>No separate log kept. But entries can be made in E/R Log book as per GMM. No entries found</i>		
Has the ship's operating company enrolled in a lab to analyze bilge holding tank samples? Name of lab: <i>NALAS, 44 1mi-Hou Street, 18540 Piraeus, Greece.</i> Record of samples sent to lab/receipts: <i>No previous records</i>	<input checked="" type="checkbox"/>	
Has the operating company and ship participated in a ship source pollution research and development project? Name of Institution: <i></i> Any prototype testing as part of the project? <i></i>		N
EMS logs for waste stream management available for verification	<input checked="" type="checkbox"/>	
SMS incorporates EMS activities and logs for waste stream management	<input checked="" type="checkbox"/>	
Is there a log to track oil usage in systems having oil to sea interfaces available: stern tube, OWS,		N
Is the vessel equipped with a tamper resistant deposit box, located in the main passageway, where crew can post anonymous reporting forms.		<input checked="" type="checkbox"/>

** Samples taken during audit and sent from Bahrain.*



Compliance Systems Inc.

SHIP'S GENERAL PARTICULARS

NAME	PLOUTOS
OWNER	GINGER MARITIME - 80 BROAD STREET, MONROVIA, LIBERIA
TECHNICAL OPERATOR	IONIA MANAGEMENT S.A. - 12 LASKOU ST. PIRAEUS, GREECE
CALL SIGN // FLAG	C6VO3 // BAHAMAS
PORT OF REGISTRY	NASSAU
CLASSIFICATION	BUREAU VERITAS - I + HULL+ MACH- OIL TANKER, ESP, COW,AUT, UMS
SHIPYARD	NEW CENTURY SHIPBUILDING CO. LTD., XIN GIANG, CHINA
KEEL LAID: 23/DEC/2005	LAUNCHED: DELIVERED: 15 DECEMBER 2006
HULL STRUCTURE	DOUBLE HULL - SBT
IMO: 9327023	KIND OF SHIP : 73,400 DWT PRODUCT OIL TANKER OFFICIAL No. 8001218
SHIP'S CHARTERER:	HEIDMAR

PRINCIPAL PARTICULARS

LOA=228.6 m	LBP=219.70 m	BREADTH MLD= 32.26 m	DEPTH MLD= 20.80 m
LIGHT SHIP= 15,670 m/t	TPC= 67.06 m/t	FWA=333 mm	
TONNAGE	REGISTERED	SUEZ	PANAMA
GROSS	42,048 M/TONS	44,162.54 M/T	
NET	22,309 M/TONS	39,772.24 M/T	

INTERNATIONAL LOAD LINE

SEASON	DRAFT	FREEBOARD	DISPLACEMENT	DEADWEIGHT	AIR DRAFT
SUMMER	14.500 Mtrs	6.116 Mtrs	89,381 M/T	73,711 M/T	34.5 M 113.1 F
TROPICAL	14.802 Mtrs	5.814 Mtrs	91,612 M/T	75,942 M/T	34.1 M 112.1 F
WINTER	14.198 Mtrs	6.418 Mtrs	87,150 M/T	71,418 M/T	34.8 M 114.0 F
Normal Ballast	13.116 Mtrs	7.500 Mtrs	44,170 M/T	28,500 M/T	41.5 M 136.0 F
CARGO OIL TANK CAPACITY	100% 86,260.022 M3	98% 84,534.822 M3	95% 81,947.021 M3		
BALLAST TANK CAPACITY	100% 25381.49 M3				
PROPELLER IMMERSION	07.40 Mtrs				

DISTANCES

BRIDGE TO BOW	188.30 Mtrs	BOW TO CENTER MANIFOLDS	111.30 Mtrs
BRIDGE TO STERN	40.30 Mtrs	STERN TO CENTER MANIFOLDS	117.30 Mtrs
BRIDGE TO MANIFOLD	76.10 Mtrs	KEEL TO HIGHEST POINT	49.00 Mtrs
SHIPS SIDE TO MANIF. FACE	04.80 Mtrs	DISTANCES BETWEEN MANIFOLDS	02.50 Mtrs
KEEL TO MAIN DECK	20.80 Mtrs	DECK TO CENTR OF MANIFOLDS	01.90 Mtrs
PARALLEL BODY SDW	154.80 Mtrs	PARALLEL BODY SBT	138.00 Mtrs

CARGO GEAR

CARGO OIL PUMPS	3 SET STEAM TURBINE VERTICAL 2,300 M3 / 130 M HEAD EACH-RPM 2500
CARGO EDUCTOR	3 SET COLAR STRIPPING EDUCTOR 250 M3 / 25 M HEAD
STRIPPING PUMP	1 SET VERTICAL RECIPROCATING 250 M3/ 130 M HEAD-45 STROKE
BALLAST PUMP	2 SET ELECTRIC DRIVEN VERTICAL 1500 M3 / 30 M HEAD
BALLAST EDUCTOR	2 SET COLAR STRIPPING EDUCTOR 200 M3 / 21 M HEAD BACK PRESS. 4.5 KG
I.G.S. FAN CAPACITY	2 X 8,700 M3 / HR
HOSE HANDLING DERRICKS	1 X 15T S.W.L. // PROVISION TRAVELLING CRANE 5.0 T S.W.L.

ENGINE PARTICULARS

MAIN ENGINE	HHM-MAN-B&W 5S60MC-C, BHP 14690 - KW 11300 X 1 SET
	OUTPUT M.C.R. 11300 KW AT 105 RPM - C.S.R. 10,170 KW AT 101.4 RPM
OPERATION SEA SPEED	14.50 KNOTS ECONOMIC SPEED 12.00 KNOTS
PROPELLER	DIA: 7.600 MM PITCH: 4,672.8 MM PITCH RATIO : 4 BLADES

COMMUNICATIONS

MMSI ID No.	309891000	INMARSAT - C : TLX: 430989110 PLOU
MINI M	TEL: 764609979 , FAX : 764609980 E-Mail: master.ploutos@telaurus.net	
FLEET 77	TEL: 764610582 , FAX : 764610584 E-Mail: Master.mvploutos@telaurus.net	

LIFEBOAT WINCH TYPE : JYW 50

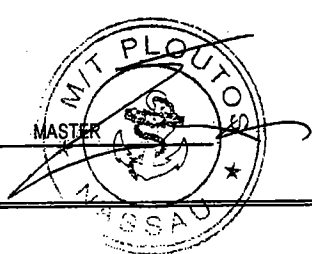
Reducers: 16x12=6 pcs, 16x10=6 pcs, 16x8=6 pcs, 10x18=6 pcs, 12x18=6 pcs

Exhibit 3

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CREW LIST									
<input checked="" type="checkbox"/> Arrival <input type="checkbox"/> Departure					Page No 1				
1. Name of Ship MT PLOUTOS			2. Port of arrival/Departure SITRA, SAHRAIN			3. Date of arrival/departure 10-Sep-10			
4. Nationality of ship BAHAMAS			5. Port arrival from JEBEL ALI, U.A.E.			6. DATE OF BIRTH			
7. No	8. Family name, given names	9. Rank or rating	10. Nationality	11. PASS PORT NO. & EXPIRY		12. NATIONAL SEAMAN BOOK NO. & EXPIRY			
1	VESTARCHIS, STYLIANOS	Master	HELLENIC	AB1518099	26-Oct-11	A83626	NO EXPIRATION	14-Apr-53	
2	RUIZ, RÓDERICK A.	Chief Off.	FILIPINO	XX6086661	23-Feb-14	B0860859	4-May-15	23-Sep-70	
3	LATOMBO NICANOR M.	2nd/Off.	FILIPINO	XX1610104	14-Jul-13	B0140679	23-Feb-11	17-Nov-57	
4	JUMUAD ED IAN C.	3rd Off.	FILIPINO	EB0043022	29-Mar-14	B0470155	22-Jul-12	7-Oct-80	
5	GARCIA SALVADOR C.	3rd Off.	FILIPINO	XX4289393	2-Aug-14	B0765115	11-Aug-14	29-Jul-61	
6	SIMOUDIS ILIAS	Chief Engr.	HELLENIC	AA3062788	1-Jul-11	A15327	NO EXPIRATION	6-Jul-54	
7	DEFANTE ROLLY B.	2nd Engr.	FILIPINO	XX4768559	14-Oct-14	B0780243	3-Nov-14	20-Feb-59	
8	MOLAS JONATHAN V.	3rd Engr.	FILIPINO	VV0508664	28-Jun-12	B269233	3-Nov-14	25-Sep-73	
9	ZOLINA LEO O.	4th Engr.	FILIPINO	TT0871725	18-Sep-11	B0492019	29-Sep-12	23-Dec-67	
10	LAVIN LAGUNAS EDUARDO ALEX	Electrician	CHILEAN	6.403.473-1	11-Feb-15	6.403.473-1	11-Feb-15	17-Dec-53	
11	PARAS MICHAEL B.	Pumpman	FILIPINO	XX5037076	23-Nov-14	A999261	6-May-13	11-May-74	
12	DUMALUS IRENEO K.	BOSUN	FILIPINO	XX2599569	26-Nov-13	B0369460	16-Apr-12	28-Jun-55	
13	NOTORIO JOEY E.	A/B	FILIPINO	XX4736024	11-Oct-14	A876983	19-Dec-12	23-Jan-78	
14	BARANDON MARLON F.	A/B	FILIPINO	XX2794674	13-Jan-14	B0653931	6-Jan-14	21-Sep-82	
15	BULALAE MICHAEL A.	A/B	FILIPINO	XX3070497	22-Feb-14	B0596367	5-Aug-13	11-20-73	
16	AYAG DARWIN G.	A/B	FILIPINO	XX3935564	9-Jun-14	B0757088	20-Jul-14	12-Jul-81	
17	REYES GILBERT D.	O/S	FILIPINO	XX1888968	25-Aug-13	B0761671	30-Jul-14	2-Dec-74	
18	DEFANTE REX B.	OILER	FILIPINO	VV0724378	27-Jan-13	B0596758	7-Aug-13	11-Apr-80	
19	MALAZARTE REFUGIO A.	OILER	FILIPINO	XX2869675	25-Jan-14	A357200	12-Nov-11	22-May-71	
20	CASIPLE PAUL A.	E/CADET	FILIPINO	XX4379644	14-Aug-14	B0597495	19-Aug-13	21-Jun-77	
21	UNTALAN FLORANTE C.	COOK	FILIPINO	XX2891815	28-Jan-14	B0664436	22-Jan-14	1-May-59	
22	SANCHEZ FORTUNATO JR. T.	Messman	FILIPINO	W0464396	7-Jun-12	B0765146	12-Aug-14	4-May-87	
23	SANTIAGO GINGER U.	Messman	FILIPINO	XX1771232	6-Aug-13	B0685518	26-Feb-14	21-Jul-85	
24	BERTILIO RUBIN B.	3rd Engr.	FILIPINO	UU0610214	30-Jan-12	B0666189	25-Feb-14	29-Dec-73	
25	DICDICAN REY A.	BOSUN	FILIPINO	XX5035007	24-Nov-14	B0172717	15-Aug-11	12-Jul-74	
26	DIMOU ARISTEIDIS	SUPERINTENDER	HELLENIC	AB 2605551	15-Nov-11			4-Nov-76	
27	JOSHI SUBHASH KASHINATH	SUPERNUMERARY	CANADIAN	BA344902	3-Sep-13			22-Jun-36	
28	HAREENDRAN SUKUMARA KURUP	TECHNICIAN	INDIAN	G2292881	12-Apr-17			15/05/85	

10-Sep-10
DATE



** IF ANY ONE WHO IS NOT HOLDING NATIONAL SEAMAN BOOK HAS TO BE INCLUDED IN PASSANGER LIST

IONIA MANAGEMENT S.A	Prepared by: DPA	Effective Date: 17/12/2009
Environmental Management Manual	Approved by: MD	Revision: 3
	Section: Operational controls	Form : ENV 009

CHIEF ENGINEER WEEKLY REPORT

VESSEL: PLOUTOS

YEAR: 2010

MONTH: SEPTEMBER

WEEK FROM: 30/08/2010

TO: 05/09/2010

NOON DATA

	SEA	SEA	SEA	SEA	SEA	SEA	ANC	
DAY	MON	TUE	WED	THU	FRI	SAT	SUN	
VOYAGE No	5/10	5/10	5/10	5/10	5/10	5/10	5/10	
M/E FO CONS/TION MT	30	20	19	35	35	35	30.1	204.10
M/E RPM	88	69.44	69.44	94	94	94	94	
STEAMING TIME	24	24	24	24	24	24	20.5	
SLIP %	-7.27	-7.86	-13.15	3.78	-0.43	-0.43	8.12	
CYL. OIL CONS/TION LTR	280	250	270	280	280	280	240	1880
M/E LO CONS/TION LTR								0
D/G FO CONS/TION MT	2.9	3.6	3.6	4.4	4.6	3.8	2.65	25.55
D/G LO CONS/TION LTR	10	20	20	20	20	20	10	120
D/G No1 RUNNING HOURS/DAY	10	24	24	24	24	24	24	
D/G No2 RUNNING HOURS/DAY						20		
D/G No3 RUNNING HOURS/DAY	24	22	24	11			2	
D/G No4 RUNNING HOURS/DAY	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
AUX. BOILER FO CONS/TION MT				6	1	9.8	0.5	17.30
FWG PRODUCTION M3	26	18	30	36	40	19	10	179.00
F.W. ROB M3	197	207	225	251	280	293	290	
SLUDGE ROB M3	9.47	9.79	9.59	9.98	9.87	9.82	9.8	
SLUDGE TKs FREE CAP. M3	38.71	38.39	38.59	38.20	38.31	38.36	38.38	
SLUDGE EVAP/TED DRAINED M3						0.33	0.08	0.41
SLUDGE INCINERATED M3	0.37	0.53	0.35	0.64	0.11			2.00
SLUDGES DELIVERED TO SHORE/BARGE								

INCINERATOR * RUNNING HOURS	8.5	15	11.5	15				50.00
BILGE WATER ROB M3	16.7	16.7	16.7	17.05	17.05	17.41	17.41	
BILGE TKs FREE CAP. M3	48.00	48.00	48.00	47.65	47.65	47.29	47.29	
BILGES THROUGH 1 5 ppm M3			1.23					
BILGES DELIVERED TO SHORE/BARGE								
OWS RUNNING HOURS			2					2.00

BILGE TANKS CAPACITY (from IOPP):	64.70 m3
SLUDGE TANKS CAPACITY (from IOPP):	48.18 m3
TOTAL BURNING, EVAPORATED, DRAINED SLUDGES:	2.41 m3
BILGE QUANTITY DISPOSED THROUGH 15 ppm	1.23 m3
BILGE GENERATED THIS WEEK	1.94 m3
SLUDGE GENERATED THIS WEEK	2.74 m3

TOTAL FUEL OIL CONSUMPTION
246.95 MT

PORT OF LAST DISPOSAL:	AMSTERDAM	LOAD	LOADING	ST/BY	ST/BY
DATE OF LAST DISPOSAL:	01/04/2010	DIS	DISCHARGING	SEA	AT SEA
QUANTITIES OF LAST DISPOSAL	SLUDGE:	10.6	ANC	ANCHORAGE	
	BILGE:	18.341	DRI	DRIFTING	

MAJOR WEEKLY ACTIVITIES - COMMENTS

AT SEA-

CHIEF ENGINEER: SIMOUDIS ILIAS

IONIA MANAGEMENT S.A	Prepared by: DPA	Effective Date: 01/07/2009
Environmental Management Manual	Approved by: MD	Revision: 0
	Section: Environmental Planning	Form: ENV 011

NON-CONFORMITY / OBSERVATION REPORT

(Please delete as appropriate)

Date: 26/03/2010	Vessel / Dept.: M/T PLOUTOS	Audit Ref.: 01/10
Auditor: Cpt. Aristeidis Dimou	Auditee: Chief Engineer	NCR/Obs No.: 01/10
Environmental Management System Audited: Pollution Prevention Equipment		
Environmental Management System Ref: 5.14	ISO 14001 Ref.:	

Non-conformity Description:

According to the Company's requirements a spare starter for the OWS pump, rotor bearing and sealing and filtering should be available onboard. However the relevant spares were not available. It was also noticed that a relevant requisition had not been issued by Chief Engineer regarding the matter.

Analysis Results (root cause):

After investigating the issue it was established that the Technical Department failed to identify the needs of the vessel since the implementation of the EMP regarding the minimum spares of the environmental critical equipment that should be available onboard. Furthermore it was established that the Chief Engineer was not adequately aware of the particular matter.

Corrective Actions

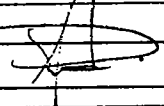
Immediate Actions:

Corrective Actions to be Taken

Description	Responsible Person	Date to be completed	Date closed out
A relevant requisition must be issued accordingly.	Chief Engineer	15/04/2010	8/04/2010
The Technical Department shall follow up the issue accordingly.	Tech. Department	25/07/2010	

Preventive Actions to be Taken

Description	Responsible Person	Date to be completed	Date closed out
The issue will be distributed throughout the fleet and relevant confirmation will be requested in order to ensure that the said spare is available onboard the company's managed vessels.	EMR	31/05/2010	31/03/10
The technical department shall establish a procedure in order to follow up the issue properly	Technical Department	30/06/2010	

Auditor's Signature: 

Auditee's Signature: 

Approved by EMR (date/signature):

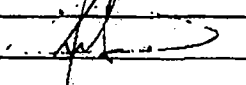
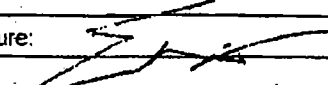
Closed out by EMR (date/signature):

Other comments:

IONIA MANAGEMENT S.A	Prepared by: DPA	Effective Date: 01/07/2009
Environmental Management Manual	Approved by: MD	Revision: 0
	Section: Environmental Planning	Form: ENV 011

NON CONFORMITY / OBSERVATION REPORT

(Please delete as appropriate)

Date: 26/03/2010	Vessel / Dept.: M/T PLOUTOS	Audit Ref.: 01/10
Auditor: Cpt. Aristeidis Dimou	Auditee: Master	NCR/Obs No.:02/10
Environmental Management System Audited: Continuous Evaluation & Improvement		
Environmental Management System Ref: 8.4	ISO 14001 Ref.:	
Non-conformity Description: During the audit with the Master it was established that although the Master's review had been completed by the previous Master on the 15 TH October, 2009 company's feedback on Master's comments was not available on board.		
Analysis Results (root cause): The Company's S&Q department failed to comply with the relevant requirements. After investigating the issue it was established that due to interdepartmental changes the issue was not properly followed by the company's responsible officer.		
Corrective Actions Immediate Actions: No immediate action is deemed necessary for the particular issue.		
Corrective Actions to be Taken		
Description	Responsible Person	Date to be completed
The issue will be properly followed up by the Company's relevant department and relevant feedback will be sent accordingly.	EMR	31/05/2010 <i>E. K. D. C. K.</i> 26/6/2010
Preventive Actions to be Taken		
Description	Responsible Person	Date to be completed
No preventive action is deemed necessary for the particular issue.		
Auditor's Signature: 	Auditee's Signature: 	
Approved by EMR (date/signature):	Closed out by EMR (date/signature):	
Other comments:		