State of Washington Department of Ecology Cruise Ship Memorandum of									Northwest Regional Office P.O. Box 330316 Shoreline, WA 98133				
E	Understanding, Cruise Operations in ECOLOGY State of Washington State Inspection Report												
In	Inspection Date Permit Number County Receiving Waters Ecology Inspector												
			King		Marine Waters			Evan Dobrowski					
Entry	Time 8:30 am	Photo	os Taken	Samples Taken		ken	Inspection			Discharges to: 🛛 Surface Water			
Exit Time 10:30 am			🗌 Ye	🗌 Yes 🖾 No		Announced		Ground Water Dewater POTW					
	and Location of Si								Additional Participants/Inspectors:				
	NIVAL LUMINO 91, Seattle, Was	-		se Line						Cody Ennis, Ecology			
	ite Representative			/e-mail					-				
	an Racovitan, I												
	envoff@carnival												
	onsible Official(s):		itle/Address/	Phone/e	-mail					Other Facili	ty Data	1:	
	ton Lobo, Vice	Presid	ent, Com	oliance	, ISN	/ Des	signated Pe	erson		Notification made to Benton Lobo on			on
Ash										June 14, 2	2023		
	hival Cruise Lin			0						Flag: Bahamas			
	5 NW 87 th Ave, Lobo2@carnival.		, FL 3317	0						Tiay. Dali	amas		
С. D	LODOZ@Carrival.	COIII			Sect	ion A	: Areas Ev	aluate	h				
	Black/Gray				0000					ardous			
	Wastewater System		Residual S		\square		ords/Reports		Was Was	te/ Solid te		Sampling/Monitoring	1
\square	Discharge Locations	\square	Operation a Maintenand		\boxtimes	Sludg	ge Handling/ osal	\square	Oily	Bilge Water	\boxtimes	Other	
	Sect	ion B:	For Vess	els Dis	char	ging ≥	≥ 1nm from	Berth	and	≥ 6 Knots	Only	[2.1.3(A)]	
	Schematics Match System	Black/G	ray Wastewa	er									
	Operations as Des Documentation	cribed in	Submitted										
	Daily 24-hour Con Turbidity or Equiva												
	Turbidimeter or Ec Equipment Function	juivalent	Monitoring										
	Auto Shut Down or Operational Controls to Insure System Shut Down if High Turbidity												
	Occurs Turbidity or Equiva	lent:											
	Last Calibration:							_			_		
	Trigger Level for E	arly Alar	$m \longrightarrow 5$		$/\Lambda$		Level for Shutc	lown: (2				
			(\bigcirc)	ove Tria					DL	ALD)			
	Recorded Turbidity/Equivalent Levels Above Triggers Daily 24-hour Continuous Monitoring for Disinfection Effectiveness												
	Disinfection Effectiveness Monitoring												
	Equipment Functioning Properly												
	Auto Shut Down or Operational Controls to Insure System Shut Down if Disinfection												
System Upset Occurs Disinfection System Operated and Maintained Properly													
	Disinfection System	n:											

	Section C: For Vessels Discharging Continuously [2.1.3(B)]						
	Schematics Match Black/Gray Wastewater System						
	Cperations as Described in Submitted Documentation						
	Daily 24-hour Continuous Monitoring for Turbidity or Equivalent Monitoring						
	Turbidimeter or Equivalent Monitoring Equipment Functioning Properly						
	Auto Shut Down or Operational Controls to Insure System Shut Down if High Turbidity Occurs						
	Turbidity or Equivalent:						
	Last Calibration:						
	Trigger Level for Early Alarm:	Trigger Level for Shutdown:					
	Recorded Turbidity/Equivalent Levels Above Trig	gers:					
	Daily 24-hour Continuous Monitoring for Disinfection Effectiveness						
	Disinfection Effectiveness Monitoring Equipment Functioning Properly						
	Disinfection Effectiveness Monitoring:	APPLICABLE					
	Auto Shut Down or Operational Controls to Insure System Shut Down if Disinfection System Upset Occurs						
	Disinfection System Operated and Maintained Properly						
	Disinfection System:						
	Section	D: General (Approved to Discharge)					
	Section D: General (Approved to Discharge) No Discharges Within ½ Miles From Shellfish						
	Beds/ Protocol (President's Point, Apple Tree Oove, Tyee Shoal, Middle Point (near Pt Townsend))						
	Discharges Immediately Stopped When High Turbidity Occurs						
	Discharges Immediately Stopped When Disinfection System Upset Occurs						
	Inmediate Notifications Made to WA Department of Health for Disinfection System Upset						
	Sampling Conducted 2/month, 1/month in Seattle (BOD, TSS, Fecal Coliform, pH, Chlorine Residual)						
	Whole Effluent Toxicity Testing 1 per 2 Years (homeported) or 1/40 Calls for Continuous						
	Section E: General						
	Wastewater Discharge Records Review	Discharge records were reviewed (blackwater/graywater/residual solids) and are maintained properly. No discharges found to be in the OCNMS, MOU waters or Washington state waters (MOU related waters). Further review will be done following the end of the season.					
\boxtimes	Wastewater Discharges protocol per MOU and managed properly	The discharge protocols are consistent with MOU requirements to not occur in MOU related waters.					
	Residual Solids Managed Properly/Disposal Protocol per MOU	Residual solids protocols are consistent with MOU requirements.					
\square	Hazardous Waste Managed Properly	Hazardous protocols are consistent with MOU requirements.					
	WA Hazardous Waste Guidelines Followed (Appendix vii)	Hazardous waste protocols are consistent with MOU requirements.					
\boxtimes	Solid Waste Managed Properly (zero garbage discharge)	Solid waste protocols are consistent with MOU requirements. Solid waste discharge records were reviewed and are maintained properly. No					

		discharges or releases of solid wastes were found to be inconsistent with MOU requirements.			
\boxtimes	Photo/X-Ray Waste Managed Properly (fluids, cartridges,) and landed ashore	Photo and x-ray waste protocols are consistent with MOU requirements.			
\boxtimes	Dry-Cleaning Wastes and Byproducts (fluids, sludge, filter materials) Managed Properly (PERC – haz waste – landed ashore)	No dry cleaning is done on board and therefore dry cleaning waste products are managed per MOU requirements.			
\boxtimes	Unused/Outdated Pharmaceuticals Managed Properly (safely disposed of)	Unused or outdated pharmaceuticals are disposed of either by incineration via red medical bag wastes and witnessed by lead nurse or are brought ashore as hazardous waste when necessary.			
\boxtimes	Fluorescent and Mercury Vapor Lamp Bulbs Managed Properly (prevent release of mercury)	Fluorescent and mercury vapor lamp bulbs protocols for management are consistent with MOU requirements. This vessel only has LED's on board and no bulb crusher.			
\boxtimes	Waste Reduction/Reuse/Recycling Opportunities Maximized (glass, cardboard, aluminum & steel cans)	Waste reduction/reuse/recycling opportunities appear to be maximized per MOU requirements.			
\boxtimes	Batteries Managed Properly (recycled, reclaimed, disposed of properly)	Batteries management protocols are consistent with MOU requirements.			
\boxtimes	Incinerator Ash Managed Properly and minimized volume (haz waste segregation and annual testing)	Incinerator ash management is consistent with MOU requirements.			
\boxtimes	Oily Bilge Water Managed Properly (<15 ppm, no visible sheen and underway)	Oily bilge water protocols are consistent with MOU requirements.			
	Ballast Water Managed Properly (per Wash regs –reporting, treated or if open sea exchange >200 nm from outside EEZ, 50nm if not EEZ)	Ballast water is managed with graywater and blackwater holding and no exchanges are necessary.			
\boxtimes	OCNMS rules and regs followed	The discharge protocols are consistent with MOU requirements and are to not occur in OCNMS waters.			
		Additional General Questions			
\boxtimes	How is deck runoff and hull cleaning handled (scuppers) (non-toxic/phosphate free cleaners, biodegradable)	Deck runoff and hull cleaning protocols are consistent with MOU requirements.			
\boxtimes	How is maintenance performed on the outside of the vessel (paint chipping, painting, etc)	Outside vessel maintenance protocols are consistent with MOU requirements.			
\boxtimes	Sculleries and Galleys – type of detergents and degreasers used (phosphate free and non-toxic)?	Restaurants and galleys use detergents and degreasers that are non-toxic and phosphate free.			
\boxtimes	How are food waste discharges handled (prevention of erroneous materials)?	Food waste discharge protocols are consistent with MOU requirements and records reviewed show no discharges in MOU related waters.			
\boxtimes	Medical sinks/floor drains, chem. stor areas wastes go where (plugged, blackwater, bilge)?	Medical sinks/floor drains are reported as connected to blackwater.			
\square	Where is pool and spa water discharged? Dechlorinated/debrominated and underway?	Pool and spa water protocols are consistent with MOU requirements.			
\boxtimes	What type of fuel is used and percent sulfur content?	Ship uses HFO with 2% sulfur content with EGCS to achieve 1% sulfur content. Inside OCNMS and MOU waters ship uses MGO with <0.1% sulfur content.			

Section F: Sampling Results					
Parameter	Results				
Biochemical Oxygen Demand 5-Day (BOD₅)					
Total Suspended Solida (TSS)					
Fecal Coliform					
Residual Chlorine					
рН					
Ammonia, Nitrogen					
Section G: Summary of Findings/Comments					

Introduction

Evan Dobrowski, Washington State Department of Ecology (Ecology) Northwest Regional Office, Water Quality Program (NWRO-WQ) conducted the inspection of the Carnival Cruise Lines CARNIVAL LUMINOSA on June 28, 2023 along with Cody Ennis, NWRO-WQ. The main contact on board the CARNIVAL LUMINOSA was Adrian Racovitan, Environmental Officer (EO) for the vessel. Prior notification of the visit was given on June 14, 2023 for security protocol. The purpose of the inspection was to evaluate compliance with the *Memorandum of Understanding Cruise Operations in Washington State* (MOU), as amended. The CARNIVAL LUMINOSA is not approved to discharge wastewater in MOU waters.

The CARNIVAL LUMINOSA was put into service in May 2009 and is 963 feet long with 16 decks. Passenger capacity is currently about 2826, with about 934 crew.

The CARNIVAL LUMINOSA is scheduled for 20 calls in Seattle between May 4, 2023 and September 14, 2023. The vessel visits Victoria on its way into Seattle.

Inspection

We arrived and boarded the ship (photo #01) at 8:30 am and began with introductions and a plan for the day with Adrian Racovitan, EO. We headed to the Engine Control Room and discussed the vessel itinerary and locations where discharges and fuel transitions occur. We reviewed electronic logs for various waste streams, saw the fuel transfer operations occurring, and went over the plan for the day with CARNIVAL LUMINOSA engineering staff. After this we discussed various waste streams and discharge protocols as well as fuel transfer protocols. We then toured the blackwater marine sanitation devices, the oily bilge treatment, and the Exhaust Gas Cleaning Systems with the engineering staff and the environmental officer. We then headed to the incinerator room and then to the garbage room.



We finished with a debrief in the Environmental Officers office reviewing discharge and offload protocols we disembarked the vessel at 10:30 am.

Discharge Types and Protocols in MOU waters, Washington State waters or the Olympic Coast National Marine Sanctuary (OCNMS) (MOU related waters):

The discharge protocols start with voyage plans for each itinerary prior to that route. A matrix is developed for each route upon a detailed review of locations for allowed discharges. The matrix for the Seattle/Alaska route details no discharges in MOU related waters, for

- bilge water;
- blackwater;
- graywater;
- food waste;
- ballast water; and
- pool and spa water.

The matrix also shows that Puget Sound is a designated No Discharge Zone for sewage with a link to our website. The matrix is overlaid onto the navigational screen (Photo #02) to show the location where fuel switch overs and discharges stop just before the OCNMS and start upon entering Canadian waters when leaving Seattle.

The protocol for discharges is a closed-loop process. There is communication between the ECR Officer on Watch and the Bridge staff for approval from the Bridge that the vessel is in an area authorized for discharge. The overboard valves have a lock which has to be manually controlled. The keys for the locks are found in the engine control room and are controlled by a badge and then finger print. The badge and finger print control will only allow that person to access certain keys allowed to them. For the discharge valves only engineering and environmental officers have access to these keys. The discharge valves are then controlled electronically after the locks are removed and the discharges are logged into the NAPA system. Any change to the logs shows who made the change by staff passcode. Any changes are reviewed by the Bridge. The GPS system is connected to the log for accurate logging of the discharge location. The discharges all to occur outside of MOU related waters (Washington State waters, the Strait of Juan de Fuca up to the border with Canada and the OCNMS). For black water and gray water, the latitude and longitude coordinates are recorded in the NAPA system along with all other logs. The date, time and location of both the start and the stop of the discharges are recorded, along with port location, effluent type, speed, tank name and volume, valve name, and status of valve. The maker of the entry and reviewer/signer is also included, along with any notes. The vessel protocol is to not discharge blackwater or graywater in Canadian waters on this route. Navigation on the bridge shows clearly marked electronic maps indicating discharges to stop 13 miles outside the OCNMS (12 miles from shore and a one mile buffer).

Discharge Types:

Blackwater includes toilet waste and medical drains and is sent by vacuum/jet to the ISIR biological treatment unit marine sanitation devices (photo #03). Description paraphrased from the schematic on the MSD system (Photo #04): Black water enters from the inlet into the aeration tank where the bacteria present in this section decomposes the blackwater in the presence of oxygen which is supplied by the aeration nozzles. A continuous supply of oxygen is necessary. The blackwater then enters into the settling section where settling takes place and flocs of activated sludge settles down along with other settleable matter. Sludge is returned back to the aeration section. The settled blackwater then enters into the disinfection section where chlorine is added (photo #03). Flow then goes to dedicated holding tanks if not in an area of discharge. Blackwater is not discharged in MOU related waters and all blackwater is treated. Settleable solids are monitored periodically and chlorine availability checked. Once per year, each MSD is taken off-line for a full maintenance cleaning. Solids are removed at this time, drummed and sent ashore.



Photo #03 6/28/23 Image: IMG_E406 By: Dobrowski Description: MSD vacuum pump

Photo #04 6/28/23 Image: IMG_E407 By: Dobrowski Description: MSD Schematics

Graywater, which includes accommodation and crew sink and shower water, galley water, laundry and possibly spa water is held treated discharged outside of MOU related waters.

Dirty bilge water collected and is sent to one of two oily bilge tanks. Liquid moves to one centrifugal oily water separators (OWS), there is also one static separator on board. The system includes two stages of filtration and recirculates at >5 parts per million (ppm) oil content with the oily content meter (photo # 05). Oily sludge is collected from the system and sent ashore by truck. Maintenance on the OWS's includes regular cleaning of the filters and other regular checks and maintenance. Prior to discharge, the liquid is sent through a white box which only allows discharges <15 ppm. The discharge protocol for this

route is outside the MOU related waters. The white box (photo #06). The Chief Engineer and the EO have the two separate keys and both need to be present to open the white box. There is a record each time the white box door is opened and a video camera on OWS equipment. The chief Engineer and the EO have the ability to review camera recordings. All portable pumps are logged and only used for certain equipment. The EO confirmed that he is not aware of any rerouting of oily bilge. The OWS was off and recirculating during the inspection and not discharging. If graywater tanks overflow or come in contact with oily bilge, the content is considered as oily bilge and treated through the OWS and the Captain and Chief Engineer are notified.



The CARNIVAL LUMINOSA uses graywater in various tanks for ballast and therefore does not do ballast water exchanges. Stability has not been an issue.

The CARNIVAL LUMINOSA has 2 saltwater pools, and 4 jacuzzies/spas which are also fresh water. The pools are discharged >12nm and outside of MOU related waters and the water can be sent to the graywater collection tanks for discharge outside of MOU related waters.

Food waste is segregated into soft and hard foods. Soft foods are fed into 8 food waste biodigesters. The effluent from the food waste biodigesters is deposited into the grey water tanks and is discharged outside of MOU related waters. Hard foods are either

incinerated or landed ashore as USDA waste in Seattle. Used cooking oil (photo #09) is sent ashore for recycling. The EO and Food Operations staff inspect the biodigesters typically daily. There is no food chute on board.



Deck runoff goes directly overboard. The VGP requirements are followed for prevention of any materials off the deck. Only non-toxic, phosphate free cleaners are used. Outside vessel maintenance such as paint chipping and painting is sometimes done at the Port of Seattle. Work does not occur if too windy and is done with permission of the Port.

Laundry water is sent to the graywater collection tanks and discharged outside MOU related waters. Dry cleaning is not done on the vessel. Therefore, no chemical such as perchloroethylene (Perc) are used on the vessel.

Photo waste is offloaded in Victoria. X-rays are done digitally without any waste. Fluorescent bulbs are not crushed on board, and held for offloading ashore as hazardous waste. Hazardous waste materials are stored separately in various dedicated locations throughout the vessel and include items such as paints, thinners, oily rags and debris, incinerator ash, chemicals, aerosols photo waste, and some batteries. Bio-medical waste is incinerated with sharps being offloaded as biomedical waste ashore. Hazardous waste is mostly offloaded in Victoria on this route.

Unused or outdated pharmaceuticals and narcotics are either destroyed onboard through incineration or are landed ashore via red medical bag waste. When medical waste is incinerated the Lead Nurse is required to transport the medical waste and witness incineration. Expired IV fluids, saline solution, and injectables are discarded down medical drains.



Photo #10 6/28/23 Image: IMG_E396 By: Dobrowski Description: Garbage/Hazardous Waste Record Example Log

Garbage such as domestic and operational waste is offloaded in Seattle. Some USDA wastes, some food waste, biomedical bagged waste, some plastics, food contaminated cardboard, and some paper is incinerated. Ash is tested annually and offloaded as hazardous waste. The garbage record book was reviewed (photo # 10) and showed consistency with requirements.

Glass, heavier plastics, most cardboard, aluminum, tin and steel cans, batteries, used cooking oil and other items are recycled in Seattle.

A wet scrubber for exhaust is installed on the CARNIVAL LUMINOSA, there are total of 3 scrubbers on diesel generators 1, 2, and 6. The wet scrubbers use bag filters that are disposed of as needed with use. While in MOU waters the vessel is switching over to MGO fuel < 0.1% sulfur. The wet scrubbers uses filters (photo #12, and photo #13) and discharges are diluted and monitored before discharge.



IMG_E4089 By: Dobrowski Description: overboard discharge lock

Image: IMG_E411 By: Dobrowski Description: EGCS filtrex

Image: IMG_E410 By: Dobrowski Description: EGCS Filtrex

The vessel has a clear process for notifications for any non-compliance incident.

Conclusions and Recommendations

The protocols for discharges are clear. Records were orderly and appeared consistent with the MOU.

Copies to: Adrian Racovitan, Environmental Officer, CARNIVAL LUMINOSA Alex Adams. Port of Seattle Amy Jankowiak, Ecology Central Files: Carnival Cruise Line - CARNIVAL LUMINOSA; WQ 6.1

Section H: Signatures					
Name and Signature of Inspector:	Agency/Office/Telephone:	Date			
Evan Dobrowski, Compliance Specialist	Department of Ecology Northwest Regional Office				
Evan Dobrowski	Water Quality Program 206-594-0175	October 30, 2023			