From: <u>alorenzana@princesscruises.com</u>

To: Faure, Albert (DEC)

Cc: Koch, Denise (DEC); White, Edward E (DEC); gwright@princesscruises.com; dhutchinson@princesscruises.com;

dwetzel@admiraltyenv.com

Subject: PCL - Response Required by 18 Mar 09: Princess SRE 1 14 09 Exhibit 6

**Date:** Wednesday, March 18, 2009 1:39:40 PM

Importance: High

Dear Albert,

The following are answers to the specific questions raised by ADEC concerning Princess Cruises SRE report.

- 1. For the Star Princess study, samples were filtered and preserved by Admiralty Environmental personnel, and the analytical metals testing was performed by Microbac Laboratories, Merrillville, IN.
- 2. Samples were collected by both the Environmental Officer (Virginie Stirbois) and by Admiralty Environmental personnel, including David Wetzel, Melissa Goldstein, Katie Goodwin, and Trevor Fritz. This information should be available on the COC forms within the sample event AE2049 report.
- 3. For samples taken by Admiralty Environmental personnel, samples were always in physical custody of the sampler. Samples taken while underway by the Environmental Officer were under her custody until physically transferred to Admiralty personnel during the vessel's port call in Juneau. Bunkering lines were sampled by Admiralty personnel by using the hose connection on the top of the fresh water bunkering line after the line was thoroughly flushed and purged. For samples taken by the Environmental Officer, the same procedure was performed. Admiralty Environmental is unsure why the test for pH was omitted during the sampling event on June 18.
- 4. This was the only study performed specifically on any of the Princess ships. More data results for potable water systems are available through the study performed by the Alaska Cruise Association. This study includes samples from bunkering points at various port locations during the 2008 season that were collected in the same manner.
- 5. Most of the samples within this project were not filtered within 15 minutes of collection. The updated EPA method for dissolved metals sampling within 15 minutes is a new regulatory change that was discovered late in the 2008 Alaska season. The topic was raised during the 2009 QA/QCP review meeting, at which point we understand that the group was deciding between pursuing ways to meet the 15 minute requirement or to seek a variance from the EPA for filtration outside of this time window. At this point, we understand that it is likely that a new procedure will be developed for clean filtration in the field within 15 minutes using a closed filtration system. None of this was either recognized or considered when the study was performed on the Star Princess in June, however.
- 6. No corrective actions were undertaken either with the sampling or testing components of this project.

Sincerely,

Andrew Lorenzana
Environmental Operations Manager, M.E.
Princess Cruises
Environmental Operations
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Office: 661-753-2755

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With reference to your Annual SRE Report of 2008 (submitted on 1 14 09), please find second set of preliminary questions below.

Reference: Exhibit 6 of 1 14 09 2008 annual SRE:

Provide responses on the following questions:

Princess conducted in 2008 season a "metal Investigation"

@Which laboratories were used for the samples?

@provide names list of the samplers of this project.

@Sample Event Number AE 2049 "Star Princess" June 20 –June 23, 2008 include multiple sample events, how was safe custody of the sample achieved? Also how was the bunkering line sampled? Was there a dedicated valve / drain? The sample sampling event at least same number AE 2049 on June 18 2008 include also bunker water sampling, why was in this instance the pH of this sampling event not measure / recorded?

@2008 season are more sample results of the potable water systems available? Or was this the single data set for 2008?

@Are all these sample taken according the updated EPA method for dissolved metals sampling within 15 minutes after sampling / filtering in the field?

@Were corrective actions needed for these sampling events / laboratory analysis? Include in your response a descriptions and actions taken (if applicable).

Unfortunately the time pressure is high, it would be appreciated if you could respond on these questions on or before March 18, 2009.

In case of questions, please do not hesitate to contact at +(907) 465 5279.

Kind Regards,

Albert Faure
ADEC – CPVEC