




**SHIP RECYCLING PLAN FOR
NSS FELINTO PERRY**

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1. INTRODUCTION

1.1. SUMMARY OF SHIP RECYCLING FACILITY

This Recycling Plan was developed for NSS FELINTO PERRY Drill Ship in accordance with the Reg.(EU) No 1257/2013 of the European Parliament of the Council and Directive on Ship Recycling and Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Vessels, 2009 (The Convention), its 2015 Guidelines for the development of the Inventory of Hazardous Materials (MEPC.269(68))

Ship Recycling Facility information	
Name of Ship Recycling Facility	BLADE DENİZCİLİK GERİ DÖN.SAN.VE TİC.A. Ş
Distinctive Recycling Company identity No	1781351662
Full address of Ship Recycling Facility	Gemi Söküm Bölgesi No: 13 Aliaga - İzmir 35800
Contact	Tel: +90 232 618 21 00 Website: www.blademaritimerecycling.com Email: gulser@blademaritimerecycling.com
Primary contact person	GÜLSER ÇINAR
Telephone number	GÜLSER ÇINAR (+90 554 550 74 86)
Licenses and Certification	İSO 9001/14001/30000/45001-HKC Ship Dismantling Permit from Ministry of Environment Ship Dismantling Authorization from Ministry of Transportation and Infrastructure
Working language(s)	Turkish/English

Vessel Particulars	
Name of the Vessel	NSS Felinto Perry
Owner	ROTA Shipping Inc.
Owner's address	
IMO No.(or MMSI no)	710443000
Port of registry/Flag	Brazil
Type	Military Ops
Year of built	1979
Net Tonnage	-
Gross tonnage	1769
Lightweight Displacement	
Length Overall (m)	77
Breadth overall (m)	17,5
Draught (m)	4,6
Inventory of Hazardous Materials	Incomar Inspection Expertise Services Co. Ltd.
Class	

Projected Schedule: Recycling of NSS FELINTO PERRY	
Estimated Arrival	02.10.2024
Project Start Date	10.10.2024
Project Completion Date	04.11.2024
Completion Date of sale/disposal of all components	19.11.2024

2. DEFINITIONS AND ABBREVIATIONS

(Source: RESOLUTION MEPC.210(63) Adopted on 2 March 2012 2012 GUIDELINES FOR SAFE AND ENVIRONMENTALLY SOUND SHIP RECYCLING MEPC 63/23 Annex 4) The terms used in the Ship Recycling Facility Plan have the same meaning as those defined in the Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships (from now on referred as Convention). The following additional definitions apply to this Ship Recycling Facility Plan only.

Adjacent space: means those spaces bordering a space in all directions, including all points of contact, corners, diagonals, decks, tank tops and bulkheads.

Dangerous atmosphere: means an atmosphere that may expose workers to the risk of death, incapacitation, impairment of ability to self-rescue (i.e., to escape unaided from a space), injury or acute illness.

Enclosed space: means a space that has any of the following characteristics:

- limited openings for entry and exit;
- inadequate ventilation; and/or
- is not designed for continuous worker occupancy.

Enclosed spaces include, but are not limited to, cargo spaces, double bottoms, fuel tanks, ballast tanks, cargo pump-rooms, cargo compressor rooms, cofferdams, void spaces, duct keels, inter-barrier spaces, boilers, engine crankcases, engine scavenge air receivers, sewage tanks and adjacent connected spaces.

Entry: means the action by which a person passes through an opening into a space. Entry includes ensuing work activities in that space and is considered to have occurred as soon as any part of the entrant's body breaks the plane of an opening into the space.

Hot work: means any activity requiring the use of electric arc or gas welding equipment, cutting burner equipment or other forms of flame, as well as heating or spark-generating tools, regardless of where it is carried out on board a ship.

Space: means a permanent or temporary three-dimensional structure or compartment on a ship such as, but not limited to, cargo tanks or holds; pump or engine rooms; storage lockers; tanks containing flammable or combustible liquids, gases, or solids; other rooms; crawl spaces; tunnels (i.e. shaft alleys); or access ways. The atmosphere within a space is the entire volume within its bounds.

SRFP:	Ship Recycling Facility Plan
SRP:	Ship Recycling Plan
IHM:	Inventory of Hazardous Materials
EMP	Environmental Monitoring Program
OHS:	Occupational Health and Safety
HKC:	Hong Kong International Convention on Safe and Environmentally Sound Recycling of Ships
HSE	Health and Safety Expert
HSE:	Health, Safety and Environment
HSEQ	Health Safety Environment and Quality
IMS:	Integrated Management Systems
GSR:	Green Ship Recycling
MHSU:	Mutual Health and Safety Unit
ACM:	Asbestos Containing Materials
PCHM:	Potentially Containing Hazardous Materials
SRAT:	Turkish Ship Recyclers' Association
SRAT WMC:	Turkish Ship Recycler's Association Waste Management Centre
EPRP:	Emergency Preparedness and Response Plan
HAZ-MAT:	Hazardous Materials
MSDS:	Material Safety Data Sheet
MEPC:	Marine Environment Protection Committee



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3. GENERAL

3.1. RECEPTION OF SHIP'S DRAWINGS & SPECIFICATIONS

Technical Report on Inventory of Hazardous Materials (IHM) of NSS FELINTO PERRY, which is prepared by INCOMAR, has been received and reviewed to prepare this plan.

Below information has been asked to ship owner;

Finished drawings and final specifications of general arrangement, capacity plan, shell expansion plan, fire control plan, trim and stability calculation, and light weight distribution or calculation table, mid ship section, construction profile (including longitudinal sections, deck, inner bottom and deckhouse), longitudinal and transverse bulkhead principal transverse sections, fore and aft construction, superstructures, crane operating manuals and capacities, accommodation plan, hydrostatic curve or table, deck piping system, general arrangement of ventilators and air ducts, painting scheme, joiner works, engine room arrangement (if appropriate) and bilge piping system of pump room, pump room arrangement, engine room piping diagram, ballast piping and cargo piping diagram and manufacturers' finished drawings of major equipment.

Structure drawings and technical characteristics obtained and has been used in preparation of this SRP.

3.2. COMPARISON OF SHIP-SPECIFIC INFORMATION WITH DASR

Ship specific information that obtained from the ship owner has been evaluated in the context of the scope and limitations of Document of Authorization to conduct Ship Recycling. There are no issues to be addressed to NSS FELINTO PERRY specific considerations that are not covered in the DASR and/or will require special procedures. With proper notification procedure NSS FELINTO PERRY will be sent to Turkey for recycling. Legal procedures to be followed are shown on Figure 1 in the following sections.

The Ministry of Environment and Urbanization and Ministry of Maritime, Transportation and Communication conducts annual audits on legal compliance of the Yard's operational activities and records. The legal permits are renewed following the audits on annual basis.

Document Title	Issuing Authority	Issue Date	Expiry date	Document No
Ship Dismantling Permit	Ministry of Environment	Dec. 2023	26 Nov.2024	GSB-2019-P13
Ship Dismantling Authorization	Ministry of Transportation and Infrastructure	Dec. 2023	26.Nov.2024	GSİ-R4-35009

3.3. COMPARISON OF SHIP-SPECIFIC INFORMATION WITH SRFP

On comparison of ship specific information with SRFP, the key considerations were about the dimension of the vessel, how the hazardous wastes should be treated, what equipment should be used on dismantling operations and Health, Safety and Environmental procedures.

- Vessel breadth is 18 meters, which is not wider than BLADE’s 50 meters shoreline. Hence 50 meters shoreline will be used for landing and dismantling operations.
- The draught of the vessel is 5.4(can be change) meters. Regular landing and pulling (slipway) operations are applicable.
- Mobile and fixed cranes will be used to transport blocks from primary cutting area. No additional heavy machinery needed.
- All hazardous materials can be removed before dismantling activities. Hazardous material types determined on IHM are in compliance with SRFP’s Facility Capacity section.
- There are contracted hazardous waste transportation and recycling or disposal facilities for NSS FELINTO PERRY ’s hazardous waste types
- Health, safety and environmental procedures explained in SRFP are applicable to the entire NSS FELINTO PERRY dismantling operation.

3.4. LEGAL PROCESS

Relevant National laws and regulations that apply to Facility and our activities including the activities which is approved to perform under DASR. are attached as Annex 2. Legal Framework.

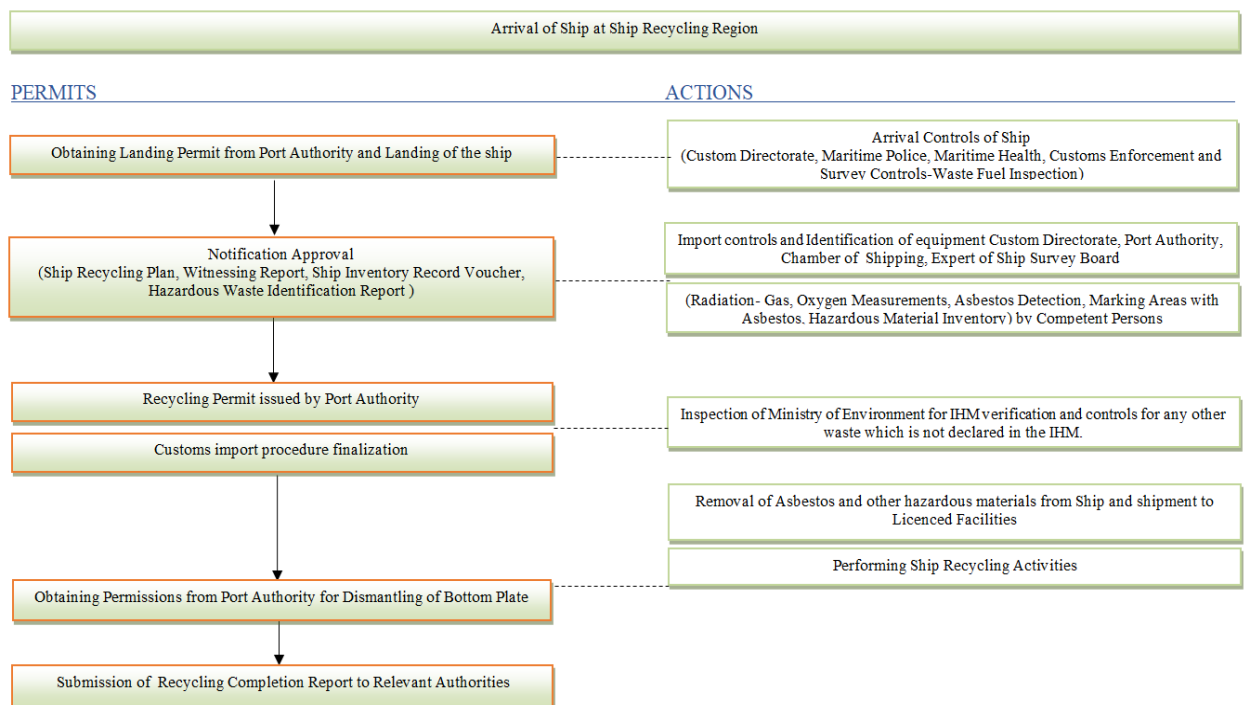



Fig 1. Ship Recycling Legal Process Flowchart

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4. FRAMEWORK OF SRP

4.1. PRE-ARRIVAL ELEMENTS

50-meter shoreline will be fully available during dismantling activities of NSS FELINTO PERRY. Preparatory work to be accomplished at this stage;

- Organizing towing operations for landing maneuver
- Placing bollards if required by mooring plan
- Acquiring legal permissions
- Personnel Trainings
- Equipment and facilities preparation

4.1.1. ORGANIZING TOWING OPERATIONS FOR LANDING MANEUVER

Maximum 12 harbor tugs are available by two local towing companies SANMAR and UZMAR. Standard procedure in Aliaga region is to notify pilot in charge about the tonnage and details of the vessel 1 week prior to its arrival. Authorized pilot in charge requests required tugs from companies. 24 hours before towing, operation notice is issued and towing operation is carried out.

Towing companies mentioned above are authorized by Port Authority and are capable of towing vessels in Aliaga region up to 500.000 DWT.

There is no other requirement for any additional permit to be obtained from local authorities such as Coast Guard. Landing Permit application will be placed by BLADE MARITIME and its agents in advance for NSS FELINTO PERRY's safe arrival.

4.1.2. ACQUIRING LEGAL PERMISSIONS – WASTE IMPORT

The port of departure country's Ministry of Environment and Turkish Ministry of Environment (MoE) will process transboundary movement of waste under Basel Convention through documentation provided by ship owners and BLADE MARITIME. With completion of the subject process, NSS FELINTO PERRY's entry permit to Turkish territorial waters as a scrap waste vessel is granted. Following the arrival of NSS FELINTO PERRY at Aliaga anchorage area, local procedures will commence is described on *Section Fig.1*

4.1.3. TRAINING, ANNOUNCEMENT OF SRP

All relevant personnel will be trained about the responsibilities and action plan to follow before and during the arrival of the vessel. Training will include briefings on mooring the vessel, precautions for environmental and safety issues, emergency response plans review overall briefing about the job and risk.

4.1.4. EQUIPMENT AND FACILITY

a. Equipment existing in our facilities and to be used in this project are;

Heavy load machinery	Crane: 1 mobile crane with the capacity of 300 tons (shore crane-P&H) 4 unit Excavator/Loader (Volvo BM model: L180C with 5000 kg/4,3m3 capacity) (KOMATSU model WA600-1 (JCB model: JS200W with 5000 kg/4,3m3 capacity) (JCB model: JS904 with 5000 kg/4,3m3 capacity) HITACHI :Z250 20890 kg) Windlass 3 set main (500ton each,1500ton total)
Roller	2 set main (2) roller, 1 set backup (1 set 500 total 1500 tonnes pulling capacity) can be increased for this project
Rescue Boat	1 unit, Tohatsu, 30hp
Cutter	Weld Cutting Machine: 8 pieces
Oxygen supply	Oxygen tank: 1 piece; 10 m3
Gas supply	LPG tank: 1 piece; 10 m3
Pressure air	Compressor: 3 unit
Fire extinguisher	Foam and water on the same line, selectable (1 m3 foam tank, 24 m3 water tank)
Waste oil treatment	-
Waste storing	Solid waste storage area: 72 m2 Temporary Mix Oil storage: 100 m3 Waste Liquid storage 2*45 m3 (drainage)

4.2. ARRIVAL OF THE SHIP

Listed actions will be completed with the arrival of NSS FELINTO PERRY at Aliaga Anchorage

- Obtaining landing permission from Port Authority,
- Mooring and securing of the vessel,
- Permission procedures including Ministry of Environment approvals, recycling permits from port authority and import procedures by customs,
- Final inspections, labeling and safety control of access ways on board,
- Placement of cranes and other equipment,
- Training and announcement of dismantling plan,
- Final controls

4.2.1. ACQUIRING LEGAL PERMISSIONS – LANDING, RECYCLING, NATIONALIZING

In order to confirm approved notification of the ship, inspection of integral parts, and inventory of hazardous material, respirability and radiation controls will be performed on board by relevant authorities. Following the approval of notification compliance, the ship will be nationalized and dismantling process will be commenced.

Several international, national and local legislations and guidelines apply in all operations. Please see *Annex 7.6 List of Up-to-Date Laws and Regulations*.

4.2.2. MOORING AND SECURING THE VESSEL

After arrival of the ship in Aliaga, she will be towed to BLADE MARITIME yard and landing maneuver is performed at plot No:13, as per *Section 4.3.1.1*

Complete shore section will be facilitated to NSS FELINTO PERRY. The vessel will be towed ashore stem on, secured by starboard and port side chains and own anchor.

4.2.3. FINAL INSPECTIONS, LABELLING AND SAFETY CONTROL OF ACCESS WAYS ON BOARD


After NSS FELINTO PERRY safely moored, SRAT HAZ-MAT Expert and our green recycling supervisor (DNV/GL - trained) will perform last waste controls and label them on board. When necessary, additional sampling and analysis for potential hazardous materials can be carried out or team may consider some materials as PCHM (Potentially containing hazardous material) by visual observations.

According to dismantling sequence, a step-by-step check of safety measures will be carried out as the final control. These are access ways, emergency escape routes, ladders condition and if proper labelling is performed.

4.2.4. PLACEMENT OF CRANES AND OTHER EQUIPMENT

After last robustness controls on fixed vessel, cranes will be placed on shore. Other dismantling and safety equipment will be placed in compliance with planned dismantling sequence.

4.2.5. TRAINING AND ANNOUNCEMENT OF DISMANTLING PLAN

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After arrival of the vessel, a training will be given to the personnel including the information of final inspections and labeling on board. This training will cover the dismantling sequence and waste management regarding the particular condition of the vessel.

All trainings will be conducted by YARD Manager, Health and Safety Experts, Environmental Engineer and/or Haz-Mat experts and daily meetings on dismantling process will be coordinated by dismantling operations responsible.

4.2.6. FINAL CONTROLS

Before dismantling operations start, a final check of equipment to use and document controls will be performed to approve start of process. This will be more comprehensive check than the daily operational controls which will cover;

- Maintenance conditions of all equipment
- Oil boom installation
- Subcontractors final licensing state
- Temporary storage availability
- Inventory of resources such as PPE, emergency station items
- Fuel and oxygen inventory
- A site walkthrough for physical control in the yard etc.

4.2.7. COMPETENT AUTHORITY AGENTS INSPECTIONS

BLADE MARITIME is being audited regularly without prior notification from relevant authorities. During this dismantling project some audits from Ministry of Environment and Ministry of Labor is likely to take place. Also, ship owner may perform an audit as described in contract agreements. Visitor Safety Instructions will be applied for their safety during each audit.

4.3. MANAGEMENT OF HAZARDOUS MATERIALS

Dismantling can only start after all hazardous materials removed from vessel. If there are hazardous materials which can only be reached after partial dismantling, trained waste removers are assigned. Yard's assigned Waste Team consist of 6 workers and led by Yard's Environmental Engineer. Team is regularly trained on Hazardous Materials and Environmental Awareness and carries on removal duties under supervision.

The Hazardous Materials Inspection will be conducted by approved haz-mat experts working for BLADE MARITIME and by experts from Turkish Ship Recyclers Association. Wastes removed from vessel will be temporarily stored in the yard. BLADE MARITIME can keep these wastes maximum 180 days in its purpose-built waste storage areas, but generally all wastes are sent to licensed facilities as soon as transportation arrangement is made.

Following of the vessel's arrival, the inspections and identifications will be made for the purpose of disposal of hazardous wastes according to inventory list of hazardous wastes listed below.

Asbestos are removed by HAZ-MAT Experts of Outsourced Company. ODS will be removed by authorized Cooling Gas Expert. All other wastes are managed by the Yard's trained Waste Team under Environmental Engineer and HAZ-MAT



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expert supervision. For each of material handling instructions are detailed in SRFP for BLADE MARITIME and personnel have been trained on Waste Handling and Waste Types in Scrap Vessels in case of exposure.

TABLE A
Materials listed in appendix 1 of the Annex to the Convention

Materials	
Asbestos	
Polychlorinated biphenyls (PCBs)	
Ozone Depleting Substances	CFCs
	Halons
	Other fully halogenated CFCs
	Carbon tetrachloride
	1,1,1-Trichloroethane (Methyl chloroform)
	Hydro chlorofluorocarbons
	Hydrobromofluorocarbons
	Methyl bromide
	Bromochloromethane
Anti-fouling systems containing organotin compounds as a biocide	

TABLE B
Materials listed in appendix 2 of the Annex to the Convention


Materials
Cadmium and cadmium compounds
Hexavalent chromium and hexavalent chromium compounds
Lead and lead compounds
Mercury and mercury compounds
Polybrominated biphenyl (PBBs)
Polybrominated diphenyl ethers (PBDEs)
Polychlorinated naphthalene (more than 3 chlorine atoms)
Radioactive substances
Certain short chain chlorinated paraffin (Alkanes, C10-C13, chloro)

Removal of hazardous wastes in ships is carried out by qualified people and equipment. Any hazardous material removed during ship recycling operations, are not subject to any treatment in the Facility. They are temporarily stored in this area and given to the licensed waste treatment facilities.

Transferring each hazardous material group differs according to their chemical properties and they have been stated in the instructions. In all dispatch operations mechanical devices are used instead of man power. They are transported by the vehicles of recovery plants. A national waste transfer form issued by the recovery plant upon receiving the materials; and a copy of this form is kept in the ship recycling yard. So, the transportation of these wastes is managed in a controlled manner.

The removal of other non-hazardous parts is carried out by our personnel with primary cutting and secondary cutting in terms of hot working methods. The metal parts of the ship are cut properly for transport. Other non-hazardous materials are collected separately in areas stated in the location plan and shipped when enough amount is collected. The cut metals are sent to licensed recovery plants to be used in iron and steel industry. The metal parts are weighed, loaded on special trucks and transported to their final destination points.

Management and planning of hazardous wastes in NSS FELINTO PERRY will be conducted according to IHM Report prepared by INCOMAR.

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A) HAZARDOUS MATERIALS CONTAINED IN THE NSS FELINTO PERRY'S STRUCTURE AND EQUIPMENT PART I

a) PAINTS AND COATING SYSTEMS CONTAINING MATERIALS LISTED IN TABLE A AND TABLE B

No.	Name of Paint	Location	Materials	Parts of use	Approximate Quantity
1	-	-	-	-	-

b) EQUIPMENT AND MACHINERY CONTAINING MATERIALS LISTED IN TABLE A AND TABLE B

No.	Name of Equipment and Machinery	Location	Materials	Parts of use	Approximate Quantity
1	Refrigeration pipe	A deck/AC room	Asbestos	Packing	6 kg
2	Compressed air pipe	Engine Room	Asbestos	Flange gasket	60 kg
3	Lifeboat batteries	A deck	Lead and Lead Compounds	Battery Internals	60 kg
4	General use batteries	Shelter Deck/Battery room	Lead and Lead Compounds	Battery Internals	440 kg

c) STRUCTURE AND HULL CONTAINING MATERIALS LISTED IN TABLE A AND TABLE B

No.	Name of Equipment and Machinery	Location	Materials	Parts of use	Approximate Quantity
1	Refrigeration plant	A deck/AC room	ODS	Refrigerant	50 kg
2	ECR air conditioner unit	Main Deck/Engine control room	ODS	Refrigerant	20 kg
3	Provision compressor	Engine room	ODS	Refrigerant	20 kg

Remarks:

After the vessel's arrival, the markings & labelling will be actualized on board according to the marking in the layout plans included in IHM. The hazardous materials that are removed from the vessel will be stored in the temporary waste storages areas within the scope of "The Regulation of Hazardous Wastes Management" which was published and entered

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into force by the official gazette dated 14.03.2005 and numbered 25755. They will be stored separately according to its properties and will be sent to licensed waste treatment facilities for the purpose of recycling/disposal.

A. ASBESTOS AND ASBESTOS CONTAINING MATERIALS (ACM)

Asbestos have not been detected in NSS FELINTO PERRY, as stated in the IHM Report by INCOMAR.

B. PERSISTENT ORGANIC POLLUTANTS (PFOS, HBCCD, HCB, PCN AND SCCP's)

PBDEs have not been detected in NSS FELINTO PERRY.

C. HEAVY METALS

a) PAINTS AND COATINGS THAT CONTAIN HEAVY METALS (TBT, LEAD, MERCURY, CADMIUM AND HEXAVALENT CHROMIUM)

Heavy Metals have been detected in some locations in NSS FELINTO PERRY, as stated in the IHM Report by INCOMAR.

Locations and Quantities

According to the NSS FELINTO PERRY's IHM report, surfaces with paints and coatings that contain heavy metals found in below locations in listed quantities;

No.	Name of Paint	Location	Materials	Parts of use	Approximate Quantity
1	-	-	-	-	-
2	-	-	-	-	-


Assignment

Paint and coatings that contain heavy metals have been not found in NSS FELINTO PERRY. This quantity will be identified, marked and partially removed at Yard by YARD's trained personnel. The Yard also will transfer the waste to Licensed waste treatment facilities. Transferring the waste to a licensed disposal facility will be done by Yard and Authorized waste carriers through MOTAT.

Paint and Coatings on Non-cutline surfaces will be sent to iron and steel processing plants as sheet steel and scrap where through the filtration system, air emissions can be controlled.

Lead (Pb) is a toxic metal used in accumulator and batteries, paints and motors, generators, pipelines and cables.

Chromium Compounds (Cr III-VI) is a toxic metal used mainly for making steel and other alloys, used for chrome plating, the manufacture of dyes and pigments, leather and wood preservation, and treatment of cooling tower water. Smaller amounts are used in drilling muds, textiles, and toner for copying machines.

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Waste Management

Unused Paints and Coatings -even found in their container- is treated as ‘‘unknown chemical’’ by Yard. If available MSDS are displayed and announced to assigned Waste Team who will unload the paints and other chemicals During pre-cleaning, ‘‘Chemical Container’’ (a double sided hopper) is placed onboard. All paints and other chemicals loaded to chemical container and transferred directly to Temporary Waste Storage of Yard.

Polycyclic aromatic hydrocarbon (PAH); generated as a result of smoldering of paints during the torch cutting. In BLADE, before hot cut, paints and coatings are removed by *hand scrapping*; where only paint on predetermined cutline is scraped by hand tools on secondary pre-cleaning area near the drainage system. No dust/mud/additional waste generated. Faulty equipment/faulty usage risks eliminated. Only waste generated is paint chips which drained away in channel and collected in the sediment tank.

Most of the paint and coats are sent to iron and steel processing plants, as sheet steel and scrap. By this way, the problematic emission of hazardous substances in paints and coatings are sent to the plants that the air emissions can be controlled easier. Labelling of sheet steels enable the steel factory to control the air emissions easier.

Wastes generated from these processes also affect the environment negatively. The residue from paint and coating removal will be identified as hazardous; managed and disposed by sending to incineration facilities. While scrapping on board, it is ensured that cutting region is at least 5 meters in land from ashore.

b) EQUIPMENT AND MACHINERY THAT CONTAIN HEAVY METALS (LEAD, MERCURY, CADMIUM AND HEXAVALENT CHROMIUM)

Some of equipment and machinery contain with Heavy Metals have been detected in several locations and in different quantities in NSS FELINTO PERRY, as stated in the IHM Report by INCOMAR.

Locations and Quantities

According to the NSS FELINTO PERRY’s IHM report, equipment and machinery contain heavy metals found in below locations in listed quantities;

No.	Name of equipment and machinery	Location	Materials	Parts of use	Approximate Quantity
-	-	-	-	-	-
-	-	-	-	-	-

Assignment

Totally 2 pcs lead batteries and 2 kg medical waste equipment and machinery contain heavy metals have been found in NSS FELINTO PERRY. This quantity will be identified, marked and partially removed at Yard by YARD’s trained personnel. The Yard also will transfer the waste to Licensed waste treatment facility. Transferring the waste to a licensed disposal facility will be done by Yard and Authorized waste carriers through MOTAT.

Lead (Pb) is a toxic metal used in accumulator and batteries, paints and motors, generators, pipelines and cables.

Waste Management



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Yard's Waste Team collects marked heavy metal sources with HAZ-MAT Expert's supervision. If there is no leakage or damage, heavy metal containing materials such as batteries, fluorescent lamps, electrical devices can be stored in Yard's Temporary Waste Storage for up to 180 days.

D. OZONE DEPLETING SUBSTANCES

ODS have been detected in several locations and in different quantities in NSS FELINTO PERRY, as stated in the IHM Report by INCOMAR.

Locations and Quantites

ODS have been detected in NSS FELINTO PERRY, as stated in the IHM Report by INCOMAR.

The hazardous substances which may damage ozone layer in a ship are listed below:

ODS have been not found in **NSS FELINTO PERRY**. This quantity will be identified, marked and removed at Yard by Yard's trained personnel. Transferring the waste to a licenced disposal facility will also be done by Yard.

Assignment

Chlorofluorocarbons (CFCs) are a family of chemical compounds as safe, non-toxic, non-flammable alternative to dangerous substances like ammonia for purposes of refrigeration and spray can propellants. The ultraviolet radiation breaks down CFCs, freeing the chlorine. Chlorine has the potential to destroy large amounts of ozone.

Halons which were widely used in fire extinguishers and explosion suppression systems, have an extremely high potential for ozone depletion - they are ten times more potent than chlorofluorocarbons (CFCs) - and they also act as a global warming agent - three and a half thousand times as potent as carbon dioxide (CO₂).

Other halogenated CFCs Carbon dioxide, methane, nitrous oxide, and certain manufactured gases called halogenated gases (gases that contain chlorine, fluorine, or bromine) become well mixed throughout the global atmosphere because of their relatively long lifetimes and because of transport by winds.

Waste Management


ODS removal is managed by Yard's Environmental Engineer, therefore Yard's ODS procedure is applied.

E. HAZARDOUS LIQUIDS, RESIDUES AND SEDIMENTS

Locations

No.	Name of Equipment and Machinery	Location	Materials	Parts of use	Approximate Quantity	
1	Oil	Bottom of Vessel	DO-FO-LO Waste Oil Sludge	Oil	-	L

Generally some oil, fuel, slack and their residues are present in the bottom of vessel. Liquid wastes have been not found on NSS FELINTO PERRY's. There is fuel in individual and integrated tanks in all parts of the ship. The oils

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used in greasing can be present in different tanks according to their intended purposes. System oils are kept in the purifier tanks in engine room and cylinder oils are kept in different tanks. Greasing/system oils may be kept in barrels as well. Tankers may bring a large amount of cargo remains to the yard. Besides them, there may be some slack remaining in all other tanks.

Waste Management

Waste oils are not mixed with other wastes, to prevent all other wastes to become hazardous. The most environmentally friendly and economical oil cleaning is recovery. Oils and oil wastes defined as hazardous wastes, even if they are listed among a particular hazardous waste list, or has hazardous waste properties (flammable, corrosive, reactive or toxic), they will be treated according the current national regulations.

Yard's mobile liquid tank pumps out liquid waste from its source and transfers directly to Mixed oil tanks at Yard. Oil contaminated liquid waste is send to licensed disposal facilities by Yard to be separated. Oil is used as fuel additive mainly in cement factories and water is disposed per national legislations. Oil and fuel in barrels and containers taken from the ship transferred to Yard's temporary storage and sent to licensed waste treatment facilities. Different types of waste oil kept in their containers and cannot be mixed with each other. fuel-oil, benzine, color, detergent, solvent, antifreeze and motorine is transferred to treatment separately. The local/national regulations require the owner of the waste inform the authorities about the flammable and ignitable liquid waste quantities, storage facilities and their storing methods. Regulations include the issues about financial liability and fire protection methods. Waste receipts are kept for inspection.

The workers protect themselves against personal injuries by using protective masks, gloves, non-slippery safety shoes, disposable overalls and goggles. Tank Cleaning Instructions apply.

F. OTHER HAZARDOUS MATERIALS

Wood: is used in furnishings and walls. Wood may affect environment as a result of wood protector and paint applied. Wooden materials are proceeded by the waste companies which are authorized by national regulations.

Polvvinyl chloride (PVC): is used widely; especially in cables, base slabs and in different types of plastic materials. PVC products may contain more than 50% of chlorine and may contain hazardous additives. Complex smoke and gas compounds may be generated depending on the presence of oxygen and other fire conditions. They include carbon monoxide and dioxin. Incinerating PVC in open areas may cause toxic gasses to raise, so that, those activities should be forbidden; besides all, when PVC is burnt it generates a great deal of hydrogen chloride. This gas causes hydrogen chloride acid in lungs when merged with water.

Rockwool: is used indoors and inside the wall and ceiling panels for insulation. During the Pre-Cleaning operation on board the vessel, Rockwool is removed mechanically, bagged and transferred directly to temporary waste storage by Yard workers and under HAZ-MAT Experts supervision if necessary. Rockwool can be kept in storage for up to 180 days and transferred to licensed waste treatment facility for disposal.

G. NON-HAZARDOUS MATERIALS

Plastic- Paper- Furniture- Others: Non-Hazardous waste such as plastics, paper, furniture and other types of waste as well as the non-hazardous waste that generated from Yard's activities are collected and separated on its source by Yard's workers. Non-hazardous waste can be kept in storage for up to 180 days and transferred to a licensed waste treatment facility for recycling.

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4.4. WORKER SAFETY

4.4.1. MEANS OF ACCESS AND EGRESS

At least 2 access points are established for all workplaces during all ship dismantling operations. Main access to vessel is always via gangway with protective cage and gangway which is tightly secured to vessel. Emergency access is always via Man Basket, wide enough to fit 2 stretchers. Means of escape are clearly marked; emergency lighting used in enclosed areas. Escape Routes are shown on vessel plans and announced to workers through Notice Board at the ship entrance.

4.4.2. SAFE FOR ENTRY

Safe for Entry Permit is issued by YARD Manager after below steps are taken and upon Health and Safety Experts approval;

Safe for Entry Permit is valid for 8 hours displayed at the ship entrance throughout the dismantling process.


- Conducting an operational risk assessment,
- Conducting an emergency response plan and assigning emergency response teams,
- air measurements by Gas Free Expert,
- setting ventilation of the entire structure,
- radiation controls by expert,
- asbestos detection by expert
- disinfection/ deracination is by component pest control company,
- Installing life line and firefighting line from the shore to vessel.
- enclosed space entries and all access points are marked,
- setting access and egress points,
- setting escape routes
- setting adequate lightning throughout the vessel,
- placing emergency response equipment on board,
- covering or marking gaps, holes and openings onboard,
- marking hazardous materials on board
- decontaminating the area – if a leakage/spill is present,
- placing the rescue boat

4.4.3. SAFE FOR HOT WORK

Hot Work Permit is issued by YARD Manager after below steps are taken and upon Health and Safety Experts approval;

Hot Work Permit is valid for 8 hours for the described work only, unless one or more factors has changed, displayed at the ship entrance throughout the dismantling process.

- Completing the Pre-Cleaning process,
- Removing all flammable materials on the cut lines
- Removing or scrapping coatings on the cutline,
- Checking pipelines, connecting pipes or gateways, tanks,
- Measuring gas levels around and in the area,
- Ensuring all hot cutters and their helpers are furnished with the correct type of PPE and other equipment,
- Ensuring all equipment is in good working order and furnished with safety elements,
- Cutting plan is present, operational teams are assigned and toolbox training is given

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4.4.4. ENCLOSED SPACES

Safe-for-Entry and Safe for hot work permissions are given after outsourced gas free expert inspect and reports about enclosed spaces. Experts performing the measurements have the below listed equipment which has been calibrated by manufacturer once a year on August;

- DRAEGER XAM 7000
- Measurement device for known gases LEL, CO, CO₂, H₂S and VOC

Measurements are followed on GA PLAN by YARD Manager. When a work involves entry to enclosed space, before starting the work, a toolbox is given to Foremen, Team Members and Emergency Teams on board the vessel. When a change occurs that could alter conditions within a tested enclosed space or other dangerous atmosphere, work in the affected space or area is stopped. Work may not be resumed until the affected space or area is visually inspected and retested by the competent person and found to comply with the certification. There is always a watchman at the enclosed space entrance.

A worker is permitted to enter a space only if the space is labelled with a Green Card as "Safe-for-entry" 'Safe-for-entry certificates are placed at every access point between ashore and the ship. A record of inspection of atmospheric tests is appended to the certificate. The certificate and/or the spaces themselves is clearly marked and presented in a manner that can be seen and understood by all workers. If a space at any time ceases to meet the Safe-for-entry criteria, the label "Safe-for-entry" is removed.

A permit for entry is issued for those intended to enter the space by the same individual(s) who is/are responsible for maintaining the certificate on behalf of the Facility, confirming that all certification processes and operational measures for safe entry have been completed and are in effect.

4.4.5. WORKING AT HEIGHTS

All works which involve an operation to be performed at 2 meters of height above the ground as well as all operations involving the danger of falling and slipping are deemed as "Working at heights."

40% of main Facility activities involve Working at Heights as on board a vessel is higher than ground level. Use of safety harness is obligatory for working at heights. HSE Team on board constantly controls railings, open edges, openings, holes and gaps according to daily Cutting Plan. The high-risk areas are barriered by steel wires with red-white warning tape. Workers in the area are notified and supervised for correct PPE usage. Safety Harnesses are available on Emergency Basket onboard the vessel.

All personnel have to comply with instructions prepared according to Article 6 of Works Health and Safety Regulations and 5th Article of these directives, using personal flotation devices, guarding deck openings, deck edges and platforms, utilizing personal fall arrest systems and guard rails and ensuring safe access to ships to prevent slip-and-fall accidents and the dropping and scattering of objects.

Preventive measures against fall in from temporarily deck openings and other incidents

- Primary cutting area should be clearly divided into compartments as work areas and passageways to avoid incidents. Always setup passageways, aisles for safe passage.
- Depending on work duration use fences, strips or cones to label work areas and passageways.



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- If there is a temporary deck opening, mark them off immediately with strips and cones to avoid entrance. Also place warning signboards for awareness of nearby personnel.
- If the work area has to be expanded, rearrange or setup safety passages and label them with warning signboards.

Work at Height Permit is issued by YARD Manager after above safety controls are conducted and upon Health and Safety Experts approval. Work at Height Permit is valid for the described work only, unless one or more factors has changed, displayed at the ship entrance throughout the dismantling process. An Operational Risk Assessment is included in the permit.

4.4.6. RISK ASSESSMENTS

There are two types of risk assessments used in BLADE MARITIME;

General Risk Assessment valid for 2 years. Prepared by Health and Safety Expert, Environmental Representer, Workplace Physician, Employer (or a Representer), Worker's Representer, It includes all activities directly or indirectly related to Yard operations. When/if a non-conformity occurs, when a new equipment, technology, method, procedure or risk introduced, when a parameter on environmental analysis has changed or in certain intervals (every 2 years) General Risk assessment is reviewed and updated accordingly. Fine Kinney Method used for the General Risk Assessment. Risk Assessment is a standalone document.

Operational Risk Assessment (JSA) is done before each, main dismantling activity such as mooring or non-routine job such as lifting an odd shaped block and each specific operation such as replacing expired firefighting foam. Depending on the nature of the job, YARD Manager, Health and Safety Expert, Environmental Manager, Foremen and Maintenance can involve in preparing the assessment. Assessment shows the risks, actual situation and precautions. It also defines related equipment, instructions, procedures and information regarding the situation. This assessment is announced to people who involve in the operation. Necessary toolbox is given, stated precautions are taken and only after HSE Supervisor's control, job can start. Operational Risk Assessment is valid for the job stated in the document and it must be approved by YARD Manager and Health and Safety Expert. An Operational Risk Assessment is done for all non-routine operations as well as when there are major deviations from the plans.


4.4.7. CUTTING PLAN

Facility prepares an Initial and General Cutting Plan according to desktop inspection of the Vessel Plans. This plan is approved by Port Authorities and Ministry of Environment of both countries (owner and recycler), and by ship owner prior to arrival of the vessel to Recycling Yard. Initial Cutting Plan is prepared to inform related parties and enable;

- Dismantling Sequence Planning
- Mooring & Pulling Planning
- Waste Management Planning
- HSEQ Planning
- Cost calculation
- Completion Date calculation

Detailed Cutting Plan is prepared by Naval Architect & Marine Engineer after vessel's arrival. Detailed Cutting Plan is created for each zone.

Equipment Cutting

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Environmental Engineer determines, plans and leads the Equipment Cutting, Tank Cutting and Pipeline Cutting. Equipment or Tank is made ready to be transferred to the Yard's Secondary Pre-Cleaning Area for further cleaning.

Announcement

Cutting Plan is announced to Foremen by YARD Manager and HS&E in a Toolbox Meeting. Plan is displayed on the Notice Board throughout the dismantling of mentioned zone.

Primary Cutting Day by Day

A detailed Cutting Plan directs Foremen. Foremen estimates cutlines for the blocks that will be segmented from the zone. YARD Manager, and HS&E Supervisors monitor the process. Foremen is responsible to prepare 25mt (approximately) blocks for Yard. At the beginning of each day, YARD Manager, HS&E and Foremen verbally agrees on areas that will be dismantled according to the Cutting Plan.

4.4.8. TANK CLEANING

Subject to controls by HSE and YARD Manager prior to Hot Work. Subject to Hot Work Permit. Tank Cleaning Instructions apply. Gas Detection Test must be carried in line with the PTW to eliminate fire and explosion risk.

4.4.9. BLOCK PRE-CLEANING

All loose materials and all flammable substances on the blocks will be removed prior to Hot Work. Attachments, insulation and cables will be removed by Cold Work. Paintwork will be mechanically scraped off on the cut lines. Oily areas will be washed through above the drainage line. Possible leakage sources will be blocked by means of wooden plugs for safe offloading from onboard the vessel to yard.

4.4.10. LIFTING

4.4.10.1. EQUIPMENT

For liftings from onboard the vessel to shore, **P & H 5300** which has 300mt Maximum Capacity and 25mt Safe Working Load is assigned to NSS FELINTO PERRY Recycling Project Lifting Equipment at the Facility is colour coded;

Seasons (2024)	Months	Color Code
Q1	Jan-Feb-Mar	
Q2	Apr-May-Jun	
Q3	Jul-Aug-Sept	
Q4	Oct-Nov-Dec	

At Arrival Inspections: Above deck cranes will be used upon the receipt of compliance certificate from an independent mechanical engineering company runs capacity tests and conforms the structural, electrical and mechanical compliance.

4.4.10.2. PERSONNEL

Trained and experienced Slings work as a team. One slinger is located next to Crane Operator onshore and one slinger is located on board the vessel. Slings, Foremen and operators are communicated through radios.



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4.4.10.3. PLANNING

Lifting plan is prepared and announced to Team Members, Foremen and the Emergency Teams by Foreman daily as a part of daily toolbox talk at the beginning of the each workday. A Generic Lifting Plan is used for routine and simple lifting operations Routine lifting operations which are a little more complex may, depending on the circumstances, need to be planned each time the lifting operation is carried out. The plan sets out clearly the actions involved at each step of the operation and identify the responsibilities of those involved. The degree of planning and complexity of the plan will vary and should be proportionate to the foreseeable risks involved in the work. Moreover, a pre-lifting check list is filled by lifting team, each day before operations to ensure the safety controls are in place.

4.4.10.4. SAFETY MEASURES

Facility works with a preferred "Safety Gap" as secondary precaution. Safe Working Load including the Safety Gap for routine liftings is equal to max.25mt. Blocks to be lifted from the NSS FELINTO PERRY, will be maximum 25 tons(for routine lifting). While cutting, cutters on board the vessel re-shapes the load to a regular shape, if the load seems to be oddly shaped, anchorage points are not equally distanced or center of gravity is not in the middle. Crane operator performs a test lift before starting each actual lifting operation.

4.4.10.5. RIGGING ARRANGEMENTS

Facility uses quad leg slings with locked hooks for all lifting operation.

4.4.10.6. WORKING UNDER SUSPENDED LOADS


Lifting over people is avoided unless absolutely impossible/impractical, in which case the work area underneath the lift shall be barriered and evacuated during the lift. Where it cannot be avoided, the risks to people must be minimized by safe systems of work and appropriate precautions. Where loads are suspended for significant periods, the area below them will be classed as a danger zone, where access is restricted.

4.4.10.7. SUPERVISING THE LIFTING OPERATIONS

Supervision will be proportionate to the risk, taking account of the competencies and experience of those undertaking the lift.

4.4.10.8. MAINTENANCE AND PERIODIC CONTROLS

Machinery and other Lifting Aids such as the hooks, slings and shackles are inspected daily and before each use by operator and approved by HSE and every 3 months by independent engineering company and in compliance with Labour Health and Work Safety Regulations Lifting Equipment is lubricated, damages checked, pins and locks checked on monthly basis as part of Annual Maintenance Plan.

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4.4.11. MOORING

3 rollers with the total 1500 mtons capacity will be deployed for moorings.

- On Arrival: The Rigs/ships to be recycled are moored onshore by ‘‘Light Landing’’ and pulled by means of rollers and capstans. First Mooring Operation includes securing the ship to shore. A Job Safety Analysis is drawn by YARD Manager and planned mooring operation is announced to Foremen and workers on a Toolbox Meeting.
- During Dismantling: Following the dismantling sequence, as the vessel is lightened, according to the size and structure of the vessel, it is anticipated that 5 or 6 Mooring Operations commence by means of rollers and capstans. Main aim for each mooring is to pull the vessel at least 10meters onshore and above drainage.
- Double Bottom Mooring: Double bottom is moored onshore by means of capstans. As it will be light enough, it can be pulled as further onshore as it needs. Primary object for double bottom mooring operation is to ensure the sediment collected throughout the dismantling of the vessel are kept within the structure and removed only on impermeable floor and above drainage.

NSS FELINTO PERRY Mooring Plan included in Section 4.5 Dismantling Sequence as 4.5.2 Mooring Plan

4.4.12. DAILY CONTROLS

Operational areas are divided into 2 main zones;

- Vessel
- Yard

HSEQ inspects all operational areas related to implementation of the processes. Non conformities are managed through CAPA Sheet. CAPA includes defining the Root Cause. After the initial respond, a more permanent solution is identified and applied. Daily Control Forms are attached as Annex

4.4.13. EMERGENCY PREPAREDNESS

An EPRP (Emergency Preparedness and Response Plan) has been prepared the procedures in EPRP are communicated to personnel regularly via HSE trainings.

Project based Emergency Plans are drawn by YARD Manager and approved by HSE for each step of the dismantling. The plans define the escape routes, locations of emergency equipment and emergency teams on duty. Plans are reevaluated and renounced as the layout, operational areas, processes and emergency teams of NSS FELINTO PERRY will change throughout the dismantling process.

4.4.14. FIRE PREVENTION

All employees of the Facility, regardless of their job description, is trained for Fire Safety. Fire Respond Teams are assigned onboard and at the yard. A fire watch team is deployed onboard. Direct firefighting line (water and foam) is installed. Each cutter operates while keeping a fire extinguisher nearby. Hot Cut commences in 2 men teams. Cutter’s helper sprays the cutting zone with water constantly while the main cutter operates. Cutter’s instructed and trained not to operate on oily, painted surfaces and surfaces with inflammable substances attached.



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Facility Fire Respond Capacity:

Fire Fighting Water: 24 m³

System Pressure: 12 bar

Flowrate: 13m³ / h

Fire Cabinets: 20 + 1 (foam)

Booster Pump: 1 units / 10m³

Alarm buttons on the left and right sides of the Yard

Fire extinguishers

* Entire firefighting system is tested once a year by independent mechanical engineer company

Nearest Fire Respond Center:

SRAT, 500m away, possesses a fire truck with canon for small fires

Nearest Fire Brigade:

Aliaga Fire Brigade is 5.2km away

4.5. ENVIRONMENTAL SAFETY

Each phrase of ship dismantling operations is monitored to ensure compliance with applicable laws and regulations as well as human health and environment. Ship recycling operations performed in the facility are also supervised by Turkish Ship Recyclers' Association in terms of environmental compliance. As well, Yard's environmental engineer tracks and control the operations for enabling a correct environmental impact assessment and analysis.

4.5.1. ENVIRONMENTAL MONITORING PROGRAMME


Facility monitors potential impacts to environment caused by recycling activities. Each year an Environmental Monitoring Program is established to determine parameters, analysing standards, sampling standards, map of sampling points, comparative assessment of previous year and current year results, preventive measures, impact areas, possible pollution sources, applied procedures and regulations, and programs efficiency is recorded all year around. EMP generally starts with assessing the previous year results and analysis. According to results, an action plan and focus points are established and followed throughout the year. At the end of the year the results of action plan is assessed and next year's Program is prepared.

Environmental impact monitoring parameters are based on;

- Sea water;
- Sediment
- Soil
- Dust, Vibration, Noise and Heat

Sediment samples are acquired once a year on the shoreline and since the main source of contamination is Hazardous Material in scrap ships, HAZ-MAT's in IHM Annex I and II and Heavy Metals such as copper, arsenic etc. are identified as analysis parameters. Analysis procedures are followed in accordance with applicable legislations to designate the present level of pollutions. Pollution test is based on analysis results. Soil and Working Environment Analysis done annually by an accredited independent laboratory. Seawater analysis are performed every 6 months by Ministry of Environment.

Measurements are carried out in order to comply with below listed regulations;

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- Water Pollution Control Regulation;
- Soil Pollution Control Regulation;
- Air Quality evaluation and management
- And various HS regulations on work environment.

4.5.2. SPILL PREVENTION

Below measures are taken both in the sea and land, to prevent leakage during the ship recycling activities. Regardless of their Job Descriptions, all employees must have knowledge and make themselves familiar with these procedures.

SOIL

All operational areas from the cutting areas on Yard are concreted. All land operations are carried out on impermeable floor.

WATER & INTERTIDAL ZONE

- The tidal range in Aliğa is between 25-45 centimetres.
- There are 2 Drainage Channels cutting the Yard horizontally from one end to other. Oily and Dry Block Cleaning Operations are performed above the Main Drainage Channel, all liquid waste is collected in the Main Drainage. Capacity of the Main Drainage system which is placed alongside the sea shore is 39 m3. Emergency Drainage acts as secondary precautions to collect run off water in case of overflow. Drainage System is maintained regularly to avoid any malfunctions.
- There is no discharge to sea in any form of liquid nor solid materials.
- 150 meters of Orange Barriers (oil boom) will be deployed around NSS FELINTO PERRY and fixed to the shore right after arrival to prevent the possible leaks to expand. 50 meters of Spare oil boom, capable of surrounding the entire ship is easily accessible at the facility and could be deployed rapidly if needed.
- All dismantling operations will be done on board inside NSS FELINTO PERRY main deck and bottom hull. The double bottom/main deck is constantly checked by HSE for cracks, leaks and damages.
- Pre- cleaning activities continue on board the vessel throughout the entire dismantling process.
- All solid waste and debris which are generated from daily on-board dismantling operations are collected into BLADE MARITIME daily.
- Spattered slag which is generated from metal cutting activities are caught in purpose-built spatter buckets and/or fire-retardant tarpaulin canvas during hot cutting.
- Big and medium size debris are collected by pre-cleaners. Small debris and dust can be swept into the lower deck, main deck or hull. All liquid and solid waste must be collected on the block before crossing tidal zone.
- In order to avoid leakage to sea, the liquids in the equipment, pipelines and tanks are drained on board before transferring to secondary pre-cleaning area at Yard. In order to prevent unforeseen leakages, YARD Manager leads the cutting operations which involves oily equipment, pipeline and tank dismantling and blinds all possible sources of leaks by means of wooden plugs, cotton rugs and absorbent materials before transferring the block.
- The intertidal zone is regularly inspected and cleared from the metal pieces by industrial magnet attached to the excavator. Remaining material which cannot be collected by magnet are handpicked by pre-cleaning team, at least twice a day based on regular visual inspection.
- Blocks are offloaded directly from the vessel to impermeable floor. Lifting of main machinery from the vessel across the tidal zone is considered as *simple non-routine lifting*.
- Crossing tidal zone: Crane operator must offload the equipment steadily considering the liquids which equipment might contain. YARD Manager ensures all possible leakage sources are plugged, all attachments which carry risk of falling into the sea or tidal zone are cleared, stripped or taped, secured.



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- Spill Kits are placed on board the ship as well as the Yard. Regardless of their job description all workers must be trained on Spill Kits. There is an Environmental Incident Respond Team, trained by SRAT and Environmental Responsible. All oil pollution response equipment is kept in SEA POLLUTION ROOM near the shore. Additional assistance is available from SRAT (oil filter curtain boom, sweeper boat) and local port emergency response units.
- There are oil and chemical spill drills twice a year, and uncertain number of unplanned drills on "Spill Respond" throughout the year.

4.5.3. DRAINAGE SYSTEM

A drainage system catches contaminated liquids and prevent discharges to the sea. There are 2 channels, automated pumps, filters, 2 collection tanks with the total capacity of 89m³, a separate electrical panel, alarm and capacity gauges within the system.

4.5.4. PRE-CLEANING

4.5.4.1. PRIMARY PRE-CLEANING

Waste will be separated at the source. Aims to prevent Hazardous and Non-Hazardous Waste, Non Metallic Materials and liquids pollute the environment, eliminate possible fire sources and ultimately, remove all substances which are harmful to human health and environment.

Prior to Pre-Cleaning Activities, HAZ-MAT's will be removed and Safe for Entry and Cold Work Permits issued.

A. First Phase: All flammable material and all loose material, fluorescents lamps, batteries, paint containers and smoke detectors.

B. Second Phase: Wall panels, wood and plastics, glass, textiles and furniture

* *Cables are cut by scissors on the hot cutline and left attached to the block.*

4.5.4.2. SECONDARY PRE-CLEANING

Carried out in designated pre-cleaning area on field. Due to vessel's structural design, certain types of insulation material within the scope of pre-cleaning may have not been removed onboard, these materials will be stripped prior to transferring the block to secondary cutting area on field during the secondary pre cleaning. Electric cabling is completely removed during on shore-precleaning as well as any potential remaining insulation material such as rock wool.

Cables will be sent licensed disposal facility without removing the outer insulation. Attachments such as signs, boards, telephones, and buttons will be kept aside for further separation by hand pickers. Waste, which generated from pre-cleaning activities will be sent to licensed Hazardous or Non-Hazardous Waste Treatment Facilities for disposal or recycling.

4.6. DISMANTLING SEQUENCE

4.6.1. OVERALL DISMANTLING SEQUENCE

4.6.1.1. DISMANTLING GENERAL RULES

- Before starting to dismantle the vessel, a gas free certificate will be obtained including safe work permit, hot work permit and cold work permits.
- For all steps above mentioned permits will be issued daily.
- Hot Cut operations will be performed by qualified hot cutters.
- Safe working load is 25 tonnes and block sizes will be determined according the cutting plan calculations.
- Anchorage points will be opened by ship foreman according the weight and balance of pieces to be lifted.
- Before lifting the blocks by crane, sling's stability must be checked by test lift.
- Holder regions will be cut, then blocks will be lifted by cranes and transferred to concrete secondary pre-cleaning area.
- After cleaning bilge water from double bottom, port authority will be notified to get the permission before cutting the plate.



SHIP RECYCLING PLAN

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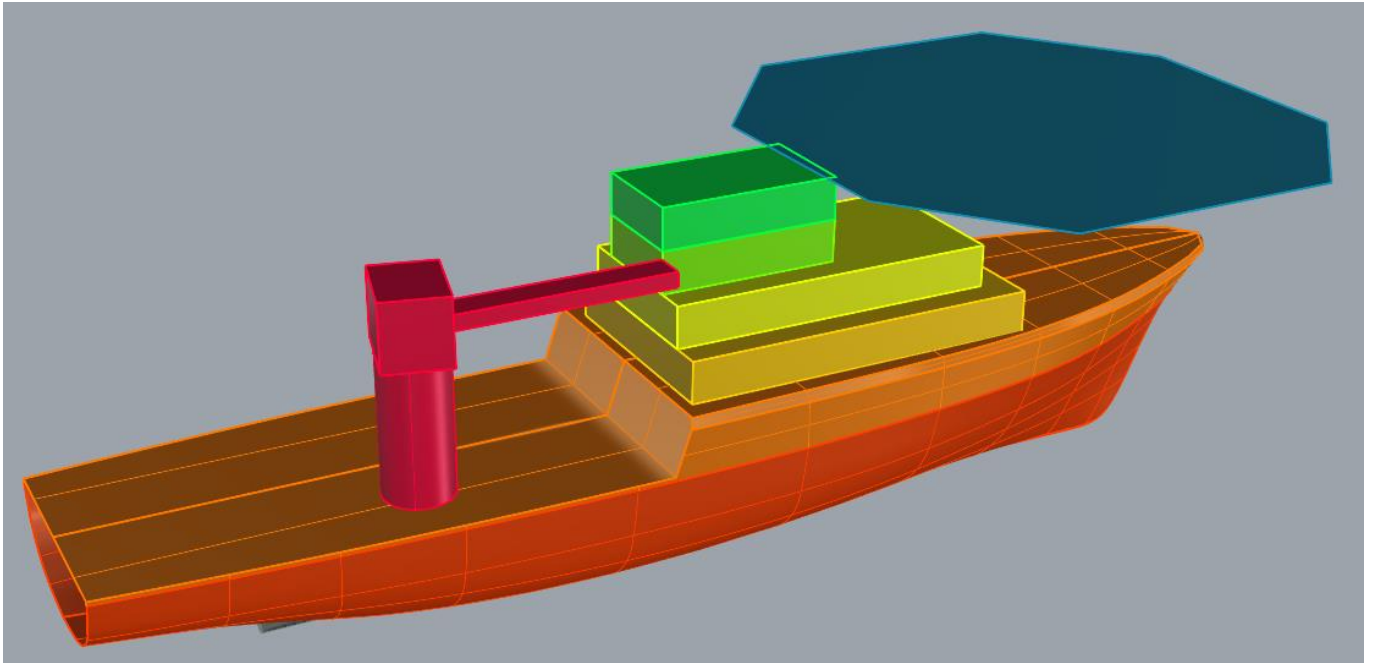
33/50

Dismantling Sequence will be followed as:

A- Pre- cleaning (Accommodation, shelter deck, main deck, below main deck, Stores, Engine room)

Procedures Apply

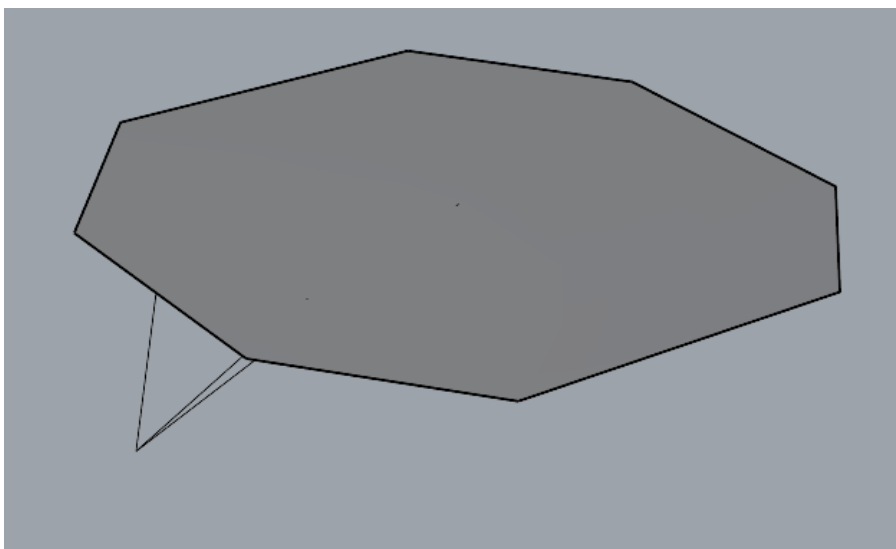
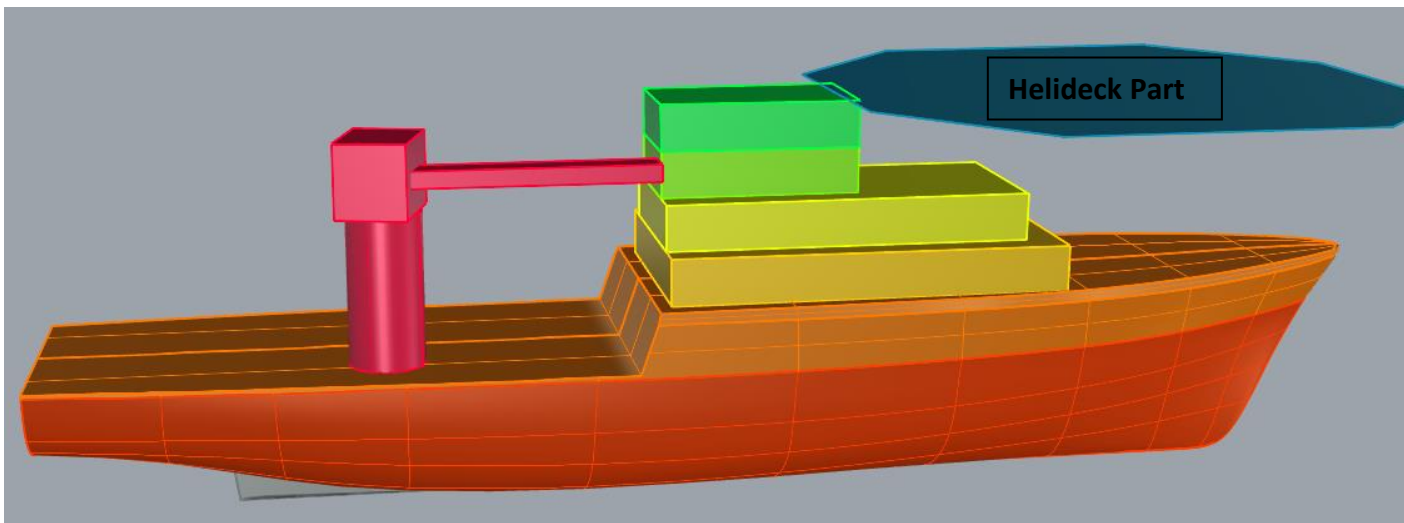
- Pre-Cleaning Instructions
- Waste Management
- Environmental Safety
- Operational Risk Assessment
- Emergency Escape Plan
- Safe for Entry
- Cold Work Permit
- Working at Height
- Confined Spaces
- Daily Yard and Vessel Controls



B- Helideck part Dismantling Sequence (1)

Procedures Apply

- Pre-Cleaning Instructions
- Waste Management
- Environmental Safety
- Operational Risk Assessment
- Emergency Escape Plan
- Mooring
- Lifting
- Cutting Plan
- Safe for Entry
- Cold Work Permit
- Hot Work Permit
- Working at Height
- Confined Spaces
- Dry Block Pre-Cleaning
- Daily Yard and Vessel Controls

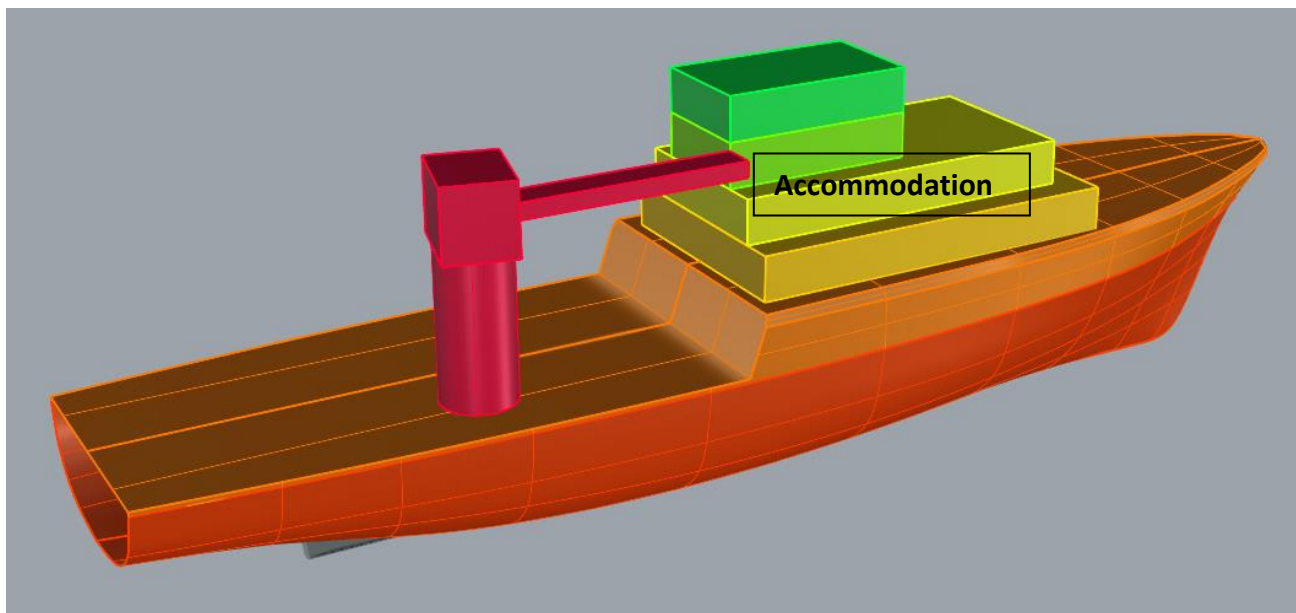
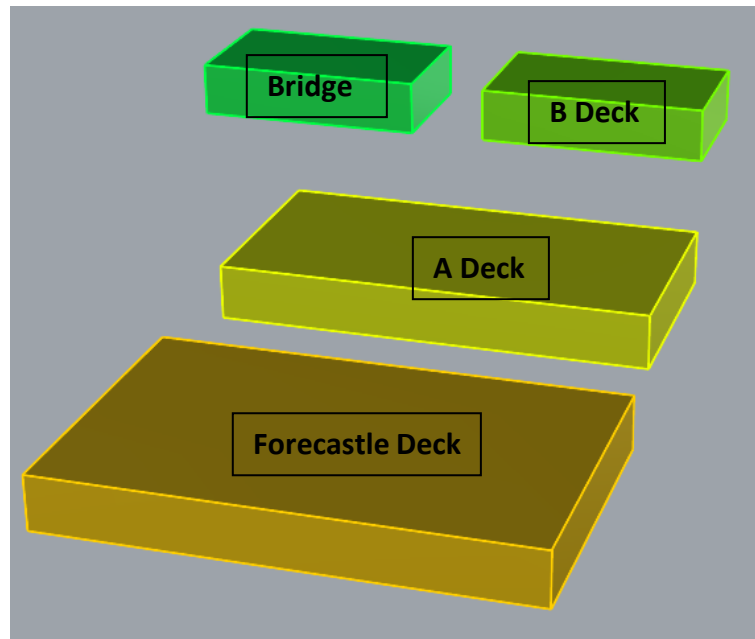


At this point, mooring operation will be performed.

C- Accommodation will be removed.(2)

Procedures Apply

- Pre-Cleaning Instructions
- Waste Management
- Environmental Safety
- Operational Risk Assessment
- Emergency Escape Plan
- Mooring
- Lifting
- Cutting Plan
- Safe for Entry
- Cold Work Permit
- Hot Work Permit
- Working at Height
- Confined Spaces
- Dry Block Pre-Cleaning
- Daily Yard and Vessel Controls

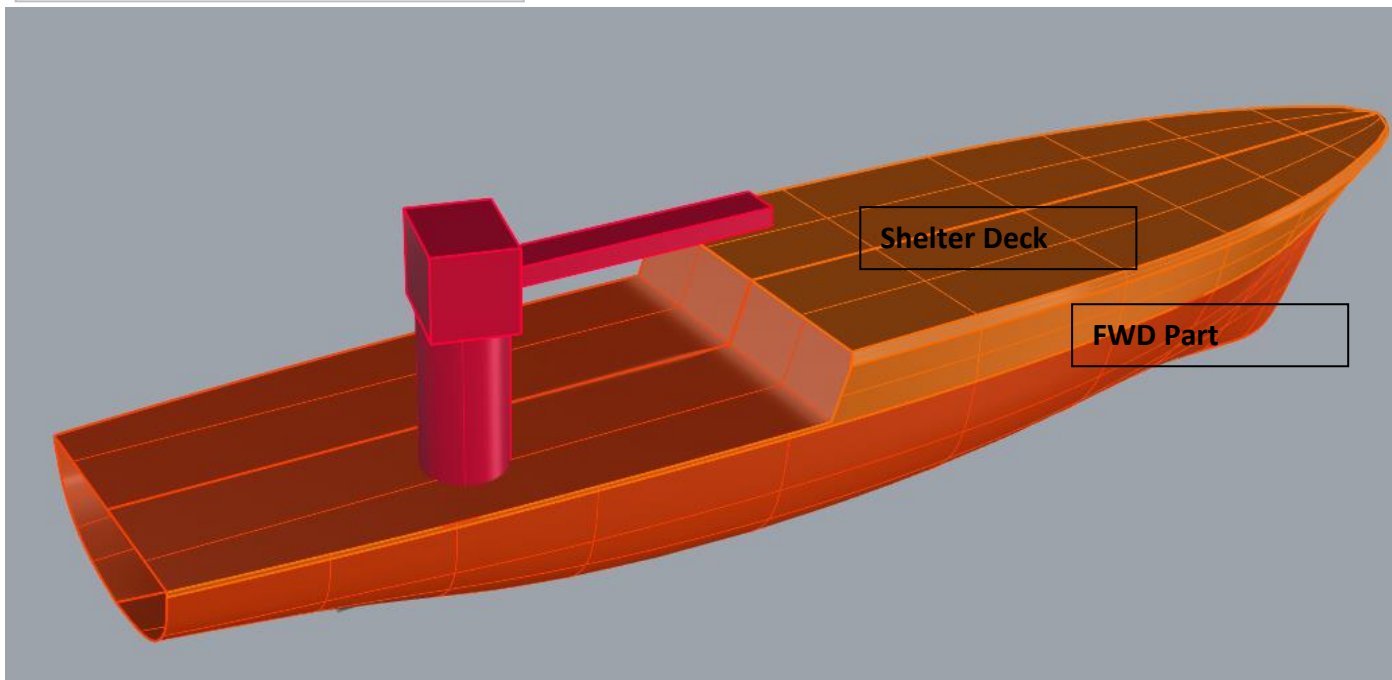


At this point, mooring operation will be performed.

D- Shelter Deck and FWD part will be removed.(3)

Procedures Apply

- Pre-Cleaning Instructions
- Waste Management
- Environmental Safety
- Operational Risk Assessment
- Emergency Escape Plan
- Mooring
- Lifting
- Cutting Plan
- Spill Control
- Oily Equipment Pre-Cleaning
- Safe for Entry
- Cold Work Permit
- Hot Work Permit
- Working at Height
- Confined Spaces
- Dry Block Pre-Cleaning
- Daily Yard and Vessel Controls

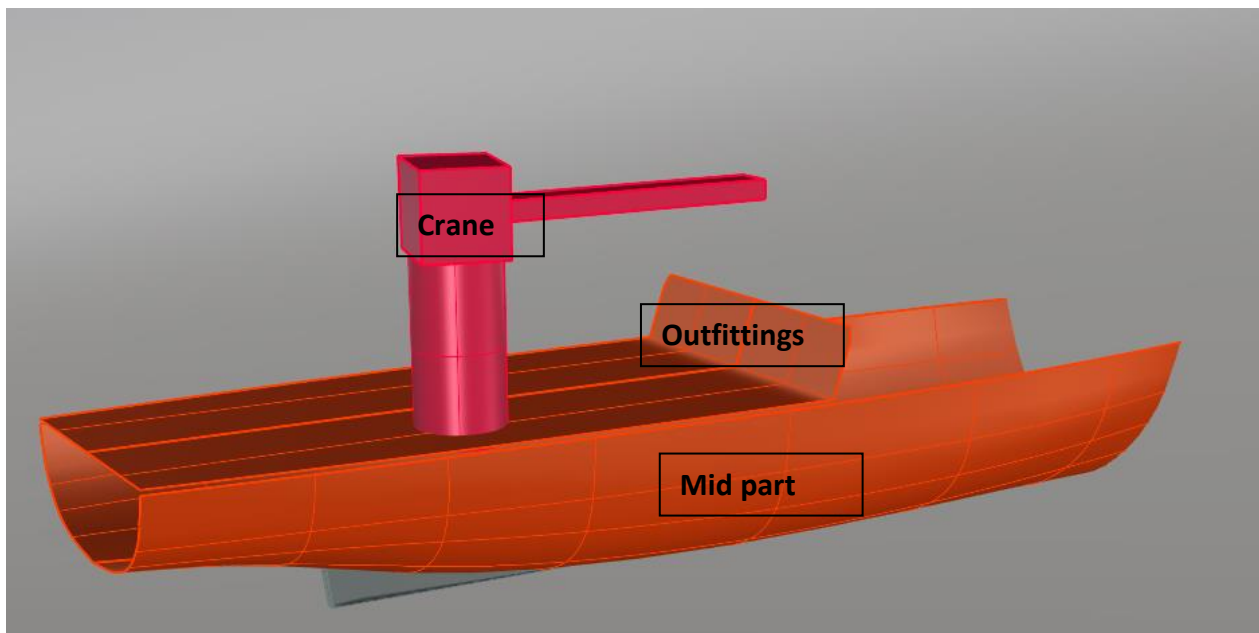


At this point, mooring operation will be performed.

E- Deck outfitting, deck crane and mid part will be removed.(4)

Procedures Apply

- Pre-Cleaning Instructions
- Waste Management
- Environmental Safety
- Operational Risk Assessment
- Emergency Escape Plan
- Mooring
- Lifting
- Cutting Plan
- Spill Control
- Oily Equipment Pre-Cleaning
- Safe for Entry
- Cold Work Permit
- Hot Work Permit
- Working at Height
- Confined Spaces
- Dry Block Pre-Cleaning
- Daily Yard and Vessel Controls

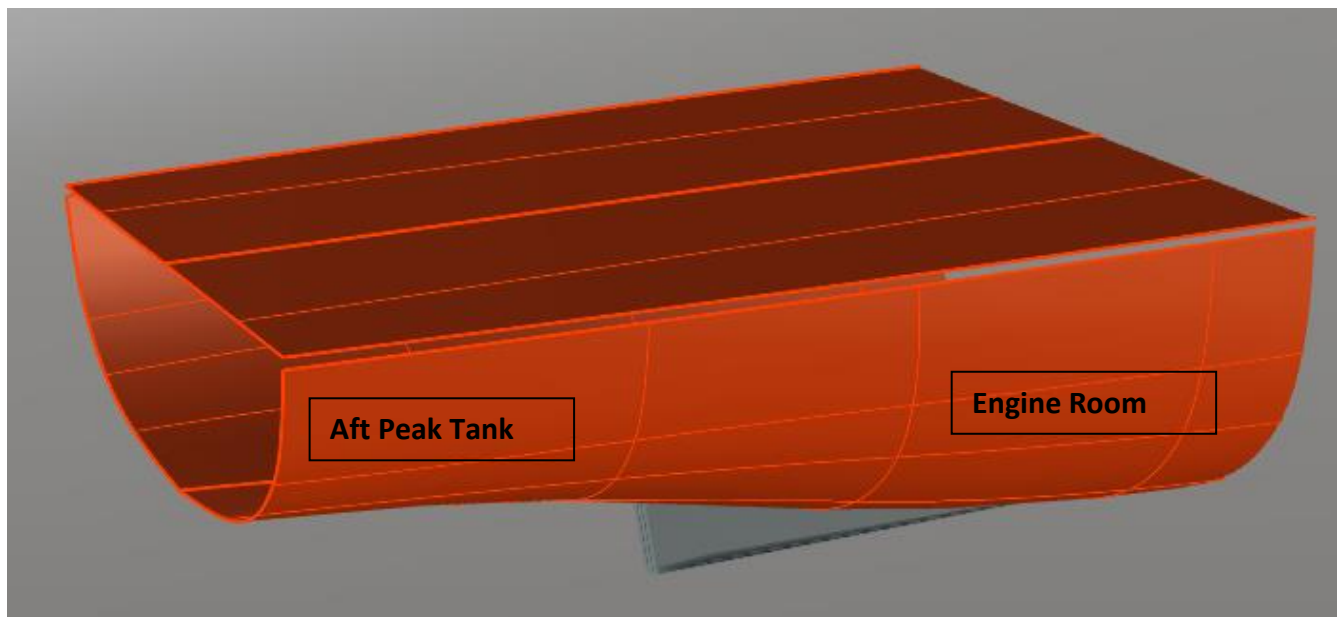


At this point, mooring operation will be performed.

F- Aft peak and engine room will be removed. (5)

Procedures Apply

- Pre-Cleaning Instructions
- Waste Management
- Environmental Safety
- Operational Risk Assessment
- Emergency Escape Plan
- Mooring
- Lifting
- Cutting Plan
- Spill Control
- Oily Equipment Pre-Cleaning
- Safe for Entry
- Cold Work Permit
- Hot Work Permit
- Working at Height
- Confined Spaces
- Dry Block Pre-Cleaning
- Daily Yard and Vessel Controls



4.6.1.2. MOORING OPERATIONS GENERAL RULES

- Each operation will aim to pull the vessel approximately 20 meters into the shore, allowing 10 meters of workable area behind the drainage channel. Environmental factors, type of the vessel and location of the propellers may affect the operation.
- The vessel will be periodically pulled to shore with the help of capstans.
- Double bottom will entirely be pulled to shore and will have no contact with the sea.
 - The vessel will be moored bow to shore and secured.
 - After removal of the Helideck (1) the mooring operation will be performed. Anchorage points will be open by hot cut, chains will be passed through the vessel's bow .Yard uses 2 capstans with each 500 tons capacity.
 - After removal of the Accommodation (2) mooring operation will be performed. Anchorage points will be change and open by hot cut, chains will be passed through the vessel (bow). Yard uses 2 capstans with each 500 tons capacity.
 - After removal of the Shelter deck and FWD part (3) mooring operation will be performed. Same anchorage point will be used.
 - After removal of the Deck outfitting, Crane and mid part (4) mooring operation will be performed. Same anchorage point will be used.
 - AFT peak tank and Engine room (5) will be pulled to shore on drainage as shortened. Anchorage points will be open by hot cut, chains will be passed through the Double bottom Yard uses 2 capstans with each 500 tons capacity.

4.6.2. SCRAP CATEGORIZATION AND STORAGE

The disassembled materials are sorted according to their types and kept in designated open or closed storage areas at Yard. Steel plates are stored in open areas until their transfer to steel plants. Hazardous materials can be kept in Yard's Temporary Waste Storage for 6 months. Wastes are sent to the licensed waste treatment facilities by registered waste transfer vehicles. Some Hazardous Waste are not stored at Yard if the waste amount is more than the storage capacity or if it is preferred to be transported immediately.

4.7. REPORTING

4.7.1. SECURITY AND ADDITIONAL RECORDKEEPING REQUIREMENTS

Visitor Safety Instructions apply when entering the Yard. A Safety Induction given by HSE and personnel details are obtained and recorded before permit to entry. There is security at Yard 24 Hours.

It is anticipated that all property including cash and personal effects belonging to passengers and crew of the vessel will so far as salvageable have been removed prior to the dismantling and recycling process. If in the course of dismantling process such effects are recovered in a salvageable condition, then they shall be returned to the Owners. BLADE MARITIME will identify such salvageable items to be recovered and record their locations.

Regular security measures will be taken through this project to prevent unauthorized access to the yard and vessel. And security will record all personnel and timing information when they are present on the yard.

4.7.2. REPORTING

As a contractual requirement, reporting to the representative of ship owner will be in the progress report format agreed upon mutually. SRP execution will also be monitored by contracted consultant company. Occupational and environmental incidents, plans, major and minor deviations in the dismantling plans, daily toolbox subjects, activities outside the working hours and operational risk assessments during dismantling are submitted to ship owner directly or through ship owner's representer at Yard and/or weekly, monthly meetings and reports.

5. DASR AND SRP APPROVAL

5.1. DASR

T.C.
ULAŞTIRMA ve ALTYAPI BAKANLIĞI
TERSANELER ve KIYI YAPILARI GENEL MÜDÜRLÜĞÜ

GEMİ SÖKÜM YETKİ BELGESİ

Tesisin Adı : Blade Denizcilik Geri Dönüşüm San. ve Tic. A.Ş.

Tesisin Adresi : Atatürk Mah. Aygaz Cad. No:43 Aliağa / İZMİR

Düzenleme Tarihi : 23/11/2022

Belge Geçerlilik Tarihi : 26/11/2023

Belge No : GSB-2022-P13

Salih TAN
Genel Müdür

T.C.
ÇEVRE, ŞEHİRCİLİK VE
İKLİM DEĞİŞİKLİĞİ BAKANLIĞI
Çevre Yönetimi Genel Müdürlüğü

GEMİ SÖKÜM İZİNİ

Belge No: GSI R4 35 009

İşbu gemi söktüm izin belgesi, Taraf olduğumuz Basel Sözleşmesi çerçevesinde ILO ve IMO gibi kuruluşlarla işbirliği içinde Basel Sekreteryası tarafından hazırlanan ve nihai hale getirilen "Gemilerin Çevreye Duyarlı Şekilde Kısmen veya Tamamen Parçalanmasına İlişkin Teknik Kılavuz" çerçevesinde 26/11/2023 tarihine kadar geçerli olmak üzere, Aliağa Gemi Söktüm Bölgesinde faaliyet gösteren Blade Denizcilik Geri Dönüşüm San. ve Tic. A.Ş.'ne ait gemi söktüm tesisine verilmiştir.

Eyyüp KARAHAN
Bakan a.
Çevre Yönetimi Genel Müdürü

Dr. Özlem YILMAZ
M.D.



SHIP RECYCLING PLAN

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5.2. VERIFICATION OF SHIP RECYCLING PLAN

- SRP submission to: Izmir Provincial Environmental Directorate
- SRP submission date:
- SRP approval date:
- SRP distributed to Ship Owner
(after approval):

6. YARD CERTIFICATES

ISO 9001:2015



Current issue date: 18 December 2020	Current issue number: 1817511	Original approval: 000 0001 - 18 December 2000
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Certificate of Approval

This is to certify that the Management System of:

BLADE DENİZCİLİK GERİ DÖNÜŞÜM SAN. VE TİC. A.Ş.

Atatürk Mah. Aygaz Cad. No:43 Gemi Söküm Tesisi: 35800 Aliağa, İzmir, Turkey

has been approved by Lloyd's Register to the following standards:

ISO 9001:2015

Approval number(s): ISO 9001 – 00028201

The scope of this approval is applicable to:
ISO 9001:2015
Ship Dismantling and Recycling Services



Daniel Oliveira
Area Operations Manager - South Europe
Issued by: Lloyd's Register Quality Assurance Ltd (LQA)
for and on behalf of: Lloyd's Register Quality Assurance Limited



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ISO 14001:2015



Current issue date: 18 December 2020	Current issue number: 1817511	Original approval: 000 0001 - 18 December 2000
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Atatürk Mah. Aygaz Cad. No:43 Gemi Söküm Tesisi: 35800 Aliağa, İzmir, Turkey

has been approved by Lloyd's Register to the following standards:

ISO 14001:2015

Approval number(s): ISO 14001 – 00028198

The scope of this approval is applicable to:
ISO 14001:2015
Ship Dismantling and Recycling Services



Daniel Oliveira
Area Operations Manager - South Europe
Issued by: Lloyd's Register Quality Assurance Ltd (LQA)
for and on behalf of: Lloyd's Register Quality Assurance Limited



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ISO 45001:2018



Current issue date: 18 December 2020	Current issue number: 1817511	Original approval: 000 0001 - 18 December 2000
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BLADE DENİZCİLİK GERİ DÖNÜŞÜM SAN. VE TİC. A.Ş.

Atatürk Mah. Aygaz Cad. No:43 Gemi Söküm Tesisi: 35800 Aliağa, İzmir, Turkey

has been approved by Lloyd's Register to the following standards:

ISO 45001:2018

Approval number(s): ISO 45001 – 00028200

The scope of this approval is applicable to:
ISO 45001:2018
Ship Dismantling and Recycling Services



Daniel Oliveira
Area Operations Manager - South Europe
Issued by: Lloyd's Register Quality Assurance Ltd (LQA)
for and on behalf of: Lloyd's Register Quality Assurance Limited



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ISO 30000:2009



Current issue date: 18 December 2020	Current issue number: 1817511	Original approval: 000 0001 - 18 December 2000
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Certificate of Approval

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BLADE DENİZCİLİK GERİ DÖNÜŞÜM SAN. VE TİC. A.Ş.

Atatürk Mah. Aygaz Cad. No:43 Gemi Söküm Tesisi: 35800 Aliağa, İzmir, Turkey

has been approved by Lloyd's Register to the following standards:

ISO 30000:2009

Approval number(s): ISO 30000 – 00028199

The scope of this approval is applicable to:
ISO 30000:2009
Ship Dismantling and Recycling Services



Daniel Oliveira
Area Operations Manager - South Europe
Issued by: Lloyd's Register Quality Assurance Ltd (LQA)
for and on behalf of: Lloyd's Register Quality Assurance Limited



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Statement of Compliance IMO Hong Kong Convention

Issued in pursuance of the International Maritime Organization's Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships, 2009 (hereinafter referred to as "the Convention").

Particulars of the Ship Recycling Facility

Name of Ship Recycling Facility	BLADE DENİZCİLİK GERİ DÖNÜŞÜM SAN. VE TİC. A.Ş.
Full address of Ship Recycling Facility	Asatürk Mah. Aygaz Cad. No: 34, Gemi Söküm Tesisleri 35800 Alağa, İzmir, Turkey
Name of Landowner	Housing Development Administration of Turkey (TOKİ)
Full address of Landowner	Bilkent Plaza B1 Blok 06530 Bilkent-Ankara, Turkey
Working language(s)	Turkish & English

THIS IS TO CERTIFY:

- 1 that the Ship Recycling Facility meets the requirements that it be designed, constructed, and operated in a safe and environmentally sound manner in accordance with the Convention;
- 2 that the Ship Recycling Facility meets the relevant requirements of Regulations 18 - 23 of the Annex to the Convention; and
- 3 that the Ship Recycling Facility operates in accordance with the relevant requirements of International Maritime Organization Resolution MEPC.210(63), 2012 Guidelines for Safe and Environmentally Sound Ship Recycling, as detailed in the Lloyd's Register Report REF: IST00000830 /Final DTR/v5.0 which accompanies this certificate.
- 4 This certification is valid for the period stated below, provided that periodical quarterly inspections as detailed overleaf have been completed to the satisfaction of the attending surveyor. If periodical inspections are found to be unsatisfactory, certification may be invalidated.

Approval Certificate No. IST00000830/EUSRW01

Original Approval: 12 April 2021

Current Certificate: 12 April 2021

Certificate Expiry *: 11 April 2026

* Subject to continued compliance with the aforementioned requirements.

Issued by: Lloyd's Register Gözetim Ltd. Şti
For and on behalf of Lloyd's Register Quality Assurance Ltd.

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Form version: 201911-HKC

7. ANNEXES

7.1. LOCATION PLAN AND DRAFT MAP

7.2. LEGAL FRAMEWORK

7.3. PROCEDURES

7.4. WASTE MANAGEMENT

7.5. EPRP

7.6. LIST OF UP TO DATE LAWS AND REGULATIONS