

COMPLIANCE WITH USCG PREP GUIDELINES FOR VESSEL RESPONSE PLANS

2016 NATIONAL PREPAREDNESS FOR RESPONSE EXERCISE PROGRAM (PREP)

The 2016 PREP Guidelines apply to **all** vessel response plan holders including tank and non-tank vessels that operate in the U.S., and provide guidance for meeting the response plan drill and exercise requirements, including the Salvage and Marine Firefighting (SMFF) exercise requirements. Within a three-year cycle, all elements of the response plan must be exercised in a drill, or series of drills, involving the vessel Owner/Operator, Qualified Individual (QI), Oil Spill Removal Organizations (OSRO) and SMFF resource providers.

Many of the requirements involve self-certification. We recommend plan holders maintain sufficient recordkeeping documentation and routinely review the exercise procedures to ensure the all of the applicable objectives are being met. The purpose of this checklist is to assist you in doing just that.

The new guidelines become effective on June 10, 2016.

SHIPBOARD EXERCISES

QUALIFIED INDIVIDUAL (QI) NOTIFICATION EXERCISES		The QI Notification Exercise is intended to be communication verification drill with between a vessel and the QI. <i>Applies to all tank and non-tank vessels operating in U.S waters.</i>	
FREQUENCY	Quarterly, while operating in U.S. waters including the US Exclusive Economic Zone (EEZ), (0 – 200nm). <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>		
	For vessels that routinely operate outside of US waters it is permissible to conduct this exercise prior to arriving in the next US port or place if the vessel has not conducted and documented an exercise during the past 3 months, but not more than four (4) times per year. <i>At least one (1) exercise per year must be conducted during non-business hours.</i>		
EXERCISE REQUIREMENTS: REQUIRED ACTIONS	1	Master, or shipboard designee, call the 24-hour emergency number.	+1 985 781 0804 <input type="checkbox"/>
	2	State you are conducting a “QI Notification Exercise.”	<input type="checkbox"/>
	3	Command Center will acknowledge and make a record of your call.	<input type="checkbox"/>
	4	Document satisfactory QI Notification Exercise was completed.	<input type="checkbox"/>
DOCUMENTATION	Successful completion of these exercises should be documented and retained onboard the vessel for three (3) years either in the ship’s log or by completing an internal exercise documentation form and filing it with the VRP/NTVRP. <ul style="list-style-type: none"> • A log entry recording successful contact with the QI by voice will satisfy USCG requirements. Alternately, you may also use the internal exercise documentation form provided at the end of this checklist. • It is NOT required to record the name of the individual with whom you spoke to as long as they identify themselves as a representative of O’Brien’s. • Do NOT send exercise documentation of QI Notification Exercises conducted by voice requesting acknowledgement as this constitutes an additional exercise via email and is unnecessary. • Exercises initiated by email or fax will NOT be considered complete until you have received a return email or fax acknowledgement from the QI. If you conduct the exercise by email only, send it to QI-Exercise@wittobriens.com. 		
NOTE	It is permissible to do this exercise by email or fax, but it is recommended by the USCG to make voice contact. If you have a real emergency, you must contact us by voice. <i>This exercise is conducted per vessel, and may be combined with the Emergency Response Procedures Exercises.</i>		

EMERGENCY PROCEDURES EXERCISES		<p>The Emergency Procedures Exercise is a shipboard drill of the emergency procedures for the vessel crew to mitigate or prevent the discharge or a substantial threat of discharge of oil as described in the shipboard spill mitigation procedures, Section 3, of the VRP. These are the same exercises you are doing for the safety management system to satisfy ISM requirements.</p> <p><i>Applies to all tank and non-tank vessels. These exercises are conducted onboard the vessel, and may be carried out anywhere in the world (not only in U.S. waters).</i></p>	
FREQUENCY		<p><u>Quarterly</u>, two (2) of the four (4) exercises per calendar year should involve a SMFF component and the other two (2) an oil spill scenario.</p>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
EXERCISE REQUIREMENTS	1	<p>Master, or shipboard designee, must conduct an exercise of the vessel's emergency procedures to ensure the crew know the necessary actions to take in order to mitigate a spill.</p>	<input type="checkbox"/>
	2	<p>The exercise should involve one or more emergency procedures or scenarios described in the shipboard spill mitigation section of the VRP.</p> <p>Examples:</p> <ul style="list-style-type: none"> • Grounding / stranding or wrecked • Collision • Explosion and/or fire • Hull Failure • Excessive list • Equipment failure • Security (Piracy or Sabotage) 	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
	3	<p>At least two (2) exercises per calendar year should also be unannounced, initiated by the plan holder, either the DPA or Master, without prior knowledge of the crew.</p>	<input type="checkbox"/> <input type="checkbox"/>
DOCUMENTATION		<p>Successful completion of these exercises should be documented and retained onboard the vessel for three (3) years either in the ship's log or by completing an internal exercise documentation form provided at the end of this checklist and filing it with the VRP/NTVRP.</p>	
NOTE		<p><i>These exercises are conducted per vessel, and may be combined with either the QI Notification Exercises <u>or</u> Remote Assessment and Consultation Exercises, but NOT both.</i></p>	

REMOTE ASSESSMENT AND CONSULTATION EXERCISES (RACE)		<p>The Remote Assessment and Consultation is intended to exercise plan notification and activation procedures to communicate a scenario from the plan's shipboard emergency procedures section with a salvage professional from the contracted SMFF provider identified in the plan.</p> <p><i>Applies to all tank and non-tank vessels operating in U.S. waters</i></p>	
FREQUENCY	<p>Annually, within the calendar year, while operating in U.S. waters, including the EEZ. <input type="checkbox"/></p> <p>For vessels that seldom operate or may not return to U.S. waters within the calendar year this exercise should be conducted upon entry.</p> <p>Vessels that do not enter U.S. waters during the calendar year are NOT required to conduct a remote assessment and consultation exercise.</p> <p><i>At least one (1) vessel per plan must conduct this exercise during non-business hours.</i></p>		
EXERCISE REQUIREMENTS: REQUIRED ACTIONS	1	<p>Master, or shipboard designee, follows VRP/NTVRP activation procedures by calling the Qualified Individual (QI), who will notify the SMFF provider. Initial contact should be made by voice at: +1 985 781 0804</p>	<input type="checkbox"/>
	2	<p>When calling the QI, state that you are conducting a “Remote Assessment and Consultation Exercise (RACE).”</p>	<input type="checkbox"/>
	3	<p>The QI will request the following information to relay to the SMFF provider:</p> <ul style="list-style-type: none"> • Vessel Name • IMO or Official Number • Name of the Master or shipboard designee • Phone: call back number • Email • Location of the vessel stability model <p>For the purpose of the RACE, it is NOT required to share details of the scenario with the QI. <i>In the event of an actual emergency or incident you would be asked by the QI to give a description of the event.</i></p>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
	4	<p>Upon receiving notification from the QI, the SMFF provider establishes communications <u>directly</u> with Master, or shipboard designee, to obtain additional scenario specific information necessary to conduct a remote assessment through an identified salvage software program.</p>	<input type="checkbox"/>
	5	<p>The SMFF provider completes the remote assessment and consultation exercise and sends documentation via email to <u>all</u> involved parties including the vessel, the DPA, and the QI at: race@wittobriens.com.</p>	<input type="checkbox"/>
	<p>A fire scenario must be exercised once (1) every three (3) years (<i>non-tank vessels with an oil capacity of less than 250 barrels do NOT need to exercise a fire scenario</i>). <i>Vessels with different salvage and marine firefighting providers should alternate exercises.</i></p>		
DOCUMENTATION	<p>Documentation of assessments should be kept with the VRP/NTVRP and retained onboard the vessel for three (3) years. They should also be maintained with the vessel owner or operators, and SMFF provider as designated in the VRP.</p>		
NOTE	<p>This exercise is conducted per vessel annually when in US waters, and may be combined with the Emergency Procedures Exercise.</p>		

SHORE SIDE EXERCISES

INCIDENT MANAGEMENT TEAM TABLE TOP EXERCISE (IMT TTX)	The IMT TTX is intended to exercise the IMT's organization, communication, and decision-making in managing a response. It is also an opportunity to exercise the 15 core components found in Appendix A of the PREP Guidelines. <i>Applies to all plan holders, TANK and NONTANK</i>	
FREQUENCY	Annually, this requirement is satisfied by attending one of the O'Brien's annual IMT TTX events.	<input type="checkbox"/>
EXERCISE REQUIREMENTS	Every three (3) years, this exercise must involve a worst-case discharge (WCD) event. Exercise the IMT in a review of: <ul style="list-style-type: none"> • Knowledge of the response plan; • Proper notifications; • Communications system; • Ability to access resource providers; • Coordination of internal organization personnel with responsibility for response; • Annual review of the transition from a local team to a regional, national, and international team as appropriate; • Ability to effectively coordinate response activity with the NRS infrastructure (If personnel from the NRS are not participating in the exercise, the IMT should demonstrate knowledge of response coordination with the NRS); • Ability to access information in the ACP for location of sensitive areas, resources available within the area, unique conditions of area, etc.; • Minimum of one IMT TTX in a triennial cycle must involve simulation of a WCD scenario; • For any chemical or biological countermeasures or in-situ burning cited in the VRP, the ability to prepare and submit a request and usage plan to the FOSC/RRT. Each such countermeasure listed in the plan will be exercised during the triennial cycle; and • When applicable to submit a request for aerial/vessel applied dispersants, American Petroleum Institute (API) Technical Report 1148 contains an example of a Daily Aerial/Vessel Dispersant Application Plan that may be appropriate for use in this situation. 	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
DOCUMENTATION	Records of event should be maintained with the vessel owner or operators, as designated in the VRP, and retained for three (3) years. <i>It is NOT required to maintain documentation of this shore side exercise on board vessels.</i> O'Brien's will issue a certification statement each year upon completion of the annual IMT TTX and post it on VesselPro™. We will also provide both company and individual certificates of participation from the IMT TTX events that may be used to satisfy this documentation requirement.	
NOTE	This exercise may be combined with the annual salvage and annual marine firefighting table top exercises.	

PLAN HOLDER'S REQUIRED ACTIONS	One or more plan holder representatives must participate in this exercise annually. This is satisfied by attending one of the IMT TTX events held by O'Brien's. Information about the dates and locations of these events can be found at: www.imtttx.com	<input type="checkbox"/>
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SALVAGE TABLE TOP EXERCISES	The Salvage Exercise is intended to exercise the salvage management team’s organization, communication, and decision-making in managing a salvage response. <i>Applies to all Plan Holders</i>
FREQUENCY	Annually, once per calendar year. <input type="checkbox"/>
EXERCISE REQUIREMENTS	Exercise the salvage management team in a review of: <ul style="list-style-type: none"> • Knowledge of the response plan; <input type="checkbox"/> • Proper notifications; <input type="checkbox"/> • Communications system; <input type="checkbox"/> • Ability to access a salvage provider; <input type="checkbox"/> • Coordination of internal organization personnel with responsibility for spill prevention and salvage: <ul style="list-style-type: none"> ○ Remote assessment and consultation; <input type="checkbox"/> ○ Begin assessment of structural stability; <input type="checkbox"/> ○ On-site salvage assessment; <input type="checkbox"/> ○ Assessment of structural stability; <input type="checkbox"/> ○ Hull and bottom survey; <input type="checkbox"/> ○ Emergency towing; <input type="checkbox"/> ○ Salvage plan; <input type="checkbox"/> ○ External emergency transfer operations; <input type="checkbox"/> ○ Emergency lightering (not required for NTVs under 250 barrel oil capacity); <input type="checkbox"/> ○ Other refloating methods; <input type="checkbox"/> ○ Making temporary repairs; <input type="checkbox"/> ○ Diving services support; <input type="checkbox"/> ○ Special salvage operations plan; <input type="checkbox"/> ○ Subsurface product removal; and <input type="checkbox"/> ○ Heavy lift. <input type="checkbox"/> • Annual review of the transition from a local team to a commercial, regional, national, and international team as appropriate; <input type="checkbox"/> • Ability to coordinate response activity effectively with the IMT and NRS infrastructure (if personnel from the IMT or NRS are not participating in the exercise, the response team should demonstrate knowledge of response coordination with the IMT or NRS); and <input type="checkbox"/> • Ability to access information in the ACP for resources available within the area, unique conditions of the area, etc. <input type="checkbox"/>
DOCUMENTATION	Records of event should be maintained with the vessel owner or operators, as designated in the VRP, and retained for three (3) years. It is not required to maintain documentation of this shore side exercise on board vessels.
NOTE	This exercise may be combined with the annual IMT TTX and/or the annual marine firefighting table top exercise.
PLAN HOLDER’S REQUIRED ACTIONS	Participate in the annual combined IMT TTX to satisfy this exercise and/or participate in a salvage specific table top exercise conducted by the contracted SMFF provider identified in your plan. <input type="checkbox"/>

EQUIPMENT DEPLOYMENT EXERCISES

EQUIPMENT DEPLOYMENT: OSRO AND SMFF	<p>The Equipment Deployment Exercises are intended to demonstrate the ability of the response personnel to deploy and operate response equipment and ensure the response equipment is in proper working order.</p> <p>These exercises are conducted and documented by the contracted OSRO and SMFF providers identified in your plan as they maintain response equipment in the US on behalf of <u>all</u> of the vessels in your plans.</p> <p><i>Applies to all plan holders.</i></p>
FREQUENCY	<p>Annually, conducted and documented throughout the calendar year as appropriate for both the OSRO and SMFF provider.</p>
EXERCISE REQUIREMENTS	<p>Deploy and operate OSRO response equipment identified in the response plan for an average most probable discharge (AMPD) response, or SMFF response equipment identified in the response plan. There is no minimum amount of equipment prescribed for SMFF exercises</p> <p>At least annually, conduct deployment of dispersant application resources, if applicable.</p> <p>Regional OSRO and SMFF providers must conduct annual deployment exercises in each operating environmental for each USCG Contingency Planning Area</p>
DOCUMENTATION	<p>Certification and supporting documentation of equipment deployment from the OSRO and SMFF provider should be maintained with the vessel owner or operators, as designated in the VRP, and retained for three (3) years.</p> <p><i>It is NOT required to maintain documentation of equipment deployment exercises on board vessels.</i></p>

PLAN HOLDER'S REQUIRED ACTIONS	<p>Plan holders must ensure that the OSRO and SMFF provider have completed the equipment deployment exercise requirements each calendar year and have prepared the necessary documentation.</p> <p>Simply citing an OSRO or SMFF provider in their response plan is NOT sufficient to ensure credit for the equipment deployment exercises, and plan holders should ensure they receive appropriate documentation from their OSRO and SMFF to claim credit for these exercises.</p>	<p>OSRO <input type="checkbox"/></p> <p>SMFF <input type="checkbox"/></p>
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UNANNOUNCED EXERCISES – FEDERAL AND STATE

<p>GOVERNMENT-INITIATED UNANNOUNCED EXERCISE (GIUE)</p>	<p>The GIUE focuses on an average most probable discharge (AMPD) scenario, which will primarily affect tank vessels at this time. While GIUEs have been part of PREP for some time, the USCG has decided to renew its focus on this unannounced exercise evaluation program in 2016 and beyond. The USCG has also reserved the authority to conduct GIUEs including SMFF resource providers, which may affect both tank and non-tank vessel plan holders in the future.</p> <p>All plan holders directed to participate in a GIUE must do so unless specific conditions exist that may result in a safety hazard. Failure to do so will result in the issuance of a Notice of Violation from USCG.</p> <p><i>Applies to all plan holders, but emphasis is on tank vessels and facilities.</i></p>		
	<p>FREQUENCY</p>	<p>The USCG has limited to a maximum of four (4) total per Captain of the Port Zone (COTP) per year.</p> <p>A vessel that successfully completes an exercise will NOT be required to participate in another GIUE for <u>at least 36 months</u> from the date of the exercise in that COTP Zone.</p> <p>Plan Holders with multiple vessels in their plan will also NOT be subject to another GIUE in the COTP Zone where the exercise was completed for 36 months from the date of a successful exercise. However, <u>all</u> vessels in the fleet plan may be subject to a GIUE in any other COTP Zone in which they operate at any time.</p>	
<p>REQUIRED ACTIONS FOR A GIUE</p>		<p>Once notified by the USCG of an unannounced exercise they should:</p>	
	<p>1</p>	<p>Immediately notify your AMPD provider to authorize deployment of response resources.</p>	<p><input type="checkbox"/></p>
	<p>2</p>	<p>Contact the Qualified Individual at O'Brien's Command Center:</p>	<p>+1 985 781 0804 <input type="checkbox"/></p>
	<p>3</p>	<p>State that the vessel is conducting a "Government Initiated Unannounced Exercise" and provide details of the exercise scenario received from the USCG.</p>	<p><input type="checkbox"/></p>
	<p>4</p>	<p>Indicate who the AMPD provider is to O'Brien's. It is paramount we know who the AMPD provider is, especially if it is not the identified and contracted OSRO in the VRP/NTVRP.</p>	<p><input type="checkbox"/></p>
	<p>O'Brien's will take the following actions:</p>		
	<p>1</p>	<p>Confirm that the Master has notified and authorized the AMPD provider to deploy response resources. If the Master has not, O'Brien's will direct him to hang up and immediately do so, then call the QI back.</p>	<p><input type="checkbox"/></p>
	<p>2</p>	<p>O'Brien's will take some basic information to complete the GIUE documentation form including the name and contact information of the AMPD provider.</p>	<p><input type="checkbox"/></p>
	<p>3</p>	<p>The QI will verify directly with the AMPD provider to ensure immediate deployment of response personnel and equipment has commenced.</p>	<p><input type="checkbox"/></p>
	<p>4</p>	<p>Complete other required regulatory notifications to the appropriate federal and state agencies.</p>	<p><input type="checkbox"/></p>
<p>5</p>	<p>Prepare a GIUE documentation form. This form includes a timeline of the actions and notifications made, a description of the scenario, and contact information for the vessel, the AMPD provider, Designated Person Ashore (DPA), and Duty Incident Commander (IC).</p>	<p><input type="checkbox"/></p>	
<p>6</p>	<p>Send the completed GIUE documentation form to the vessel Master and DPA.</p>	<p><input type="checkbox"/></p>	
<p>DOCUMENTATION</p>	<p>O'Brien's will prepare the GIUE documentation form, and send the completed form to the Master and DPA. A sample of this form is included at the end of this checklist. The USCG will also provide a GIUE Results Letter. This letter will identify any deficiencies, a timeline to correct those deficiencies, and the exercise credit earned as a result of the GIUE. The COTP may require plan holders to correct minor deficiencies, even if the exercise is deemed satisfactory.</p> <p>Records of event should be maintained with the vessel owner or operators, as designated in the VRP, and retained for three (3) years. As these exercises are vessel-specific a copy should be retained on board with the Vessel Response Plan.</p>		

COMPLIANCE WITH STATE DRILL AND EXERCISE REQUIREMENTS

STATE AGENCY INITIATED UNANNOUNCED DRILLS	<p>The states of Alaska, Washington, Oregon and California may board your vessel and request that you conduct an unannounced notification drill.</p> <p>These drills are usually in the form of notification exercises, but may also be incorporated as part of a GIUE led by the USCG.</p>		
1	Do NOT delay as time is of the essence. Immediately notify the QI at:	+ 1 985 781 0804	<input type="checkbox"/>
2	State: "This is a State-Initiated Unannounced Notification Exercise," repeated three (3) times.		<input type="checkbox"/>
<p><i>Tell the QI that you are involved in an unannounced drill and that you have state authorities on board. We must follow special procedures on our side to successfully comply with the unannounced drill requirements within 30 minutes. You must tell us this exercise is being required by state authorities. Otherwise, we may mistake it for a normal QI Notification Exercise. This will undoubtedly lead to a failure of the drill and a possible penalty for the ship.</i></p>			
NOTE	<p>Our watch standers will follow a similar but different process when communicating with vessel Master's and crew for these exercises.</p> <p><i>This includes completing a series of regulatory notifications and providing the vessel a written confirmation via email or fax within 30 minutes of receiving the call.</i></p>		
<p>In California, a boarding officer may also initiate an unannounced drill of your Incident Management Team (O'Brien's). If this happens the Master will be presented with a detailed scenario by the boarding officer and must:</p> <ul style="list-style-type: none"> • Take the actions required by the California Vessel Oil Spill Contingency Plan. • Immediately call our 24-hour emergency number +1-985-781-0804. • State: "This is a State-Initiated Incident Management Team Exercise," repeated three (3) times. • Inform the Qualified Individual of the details of the unannounced drill. • Provide support as requested by the Qualified Individual. <p>It is likely that the master will have little involvement in the exercise after initial notification has been made. However, the guidelines are vague so the master should be prepared to participate as required by the DFW Drill Coordinator and the Qualified Individual.</p>			