



Marine Safety Information Bulletin

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FAQS | NPREP 2016: Vessel Response Plan Exercises - GIUEs and SMFF

This Bulletin publishes answers to frequently asked questions (FAQs) regarding the new 2016 National Preparedness for Response Exercise Program (NPREP) guidelines as they pertain to Salvage and Marine Fire Fighting (SMFF) exercises and Government Initiated Unannounced Exercises (GIUEs). With full implementation of the SMFF portions of OPA90 completed in 2011, the 2016 revision of the NPREP Guidelines appropriately incorporated SMFF exercises into the NPREP Guidelines. Consequently, the Coast Guard has received numerous questions with respect to implementing the new NPREP SMFF exercise guidelines. Additionally, since the release of the new NPREP guidelines, many questions have been submitted with respect to the USCG GIUE program as it pertains to vessel response plans. CG-MER has prepared a summary table of SMFF and GIUE related FAQs. This table is included as an enclosure to this MSIB.

NOTE: The 2016 NPREP Guidelines can be found the USCG Homeport site at <https://Homeport.uscg.mil/exercises> (select the "Port Level Exercises" link).

Questions regarding this should be forwarded to the Coast Guard Office of Marine Environmental Response, NPREP Program manager, Mr. Jonathan Smith at **202-372-2675** or by email at Jonathan.R.Smith@uscg.mil.

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ENCLOSURE TO MER-MSIB 12-16

FAQS | NPREP 2016: Vessel Response Plan Exercises - GIUEs and SMFF

Question	Answer
Topic 1: VRP Activation	
Should the Federal On-Scene Coordinator/Captain of the Port (FOSC/COTP) require a plan holder to "activate" their VRP every single time they have a marine casualty that requires marine firefighting or salvage?	Activation of the VRP is triggered when "the master of the vessel has determined that the resources and personnel available on board cannot meet the needs of an actual or potential incident." 73 Fed. Reg. 80618, 80626 (Dec. 31, 2008)
What does "activation" of the VRP really mean?	Activation is the implementation and execution of the response protocols and resources outlined in the VRP. It is then the responsibility of the vessel owner/operator to follow the VRP, unless otherwise approved by the FOOSC.
Can a plan holder mobilize SMFF resources without activating their VRP?	Yes. But if an actual or potential incident requires VRP activation, the plan holder must adhere to the VRP unless otherwise approved by the FOOSC. 33 CFR 155.4032(a)
Topic 2: Government Initiated Unannounced Exercises (GIUEs) – General	
Will GIUEs be conducted on tank vessels while moored at an MTR for loading or bunkering operations?	No, the Coast Guard will not conduct a GIUE of a tank vessel moored at an MTR for a vessel-source discharge scenario.
How can the Coast Guard conduct a vessel GIUE on a NTV when AMPD coverage only applies to tank vessels?	The Coast Guard will only conduct vessel-source discharge GIUEs on tank vessels or non-tank vessels <u>carrying oil as cargo</u> .

Topic 3: SMFF Exercises – General	
Do SMFF Providers need to exercise per VRP plan holder or generic response plans?	Per the PREP Guidelines, “if an industry plan holder has developed one response plan that covers a fleet of vessels...this plan holder would only be required to conduct one ‘set’ of exercises for the plan, with the exception of QI notification exercises (required for all vessels and facilities), SMFF remote assessment and consultation exercises and the emergency procedures exercises (required for all manned vessels and unmanned tank barges.” 2016 PREP Guidelines, Section 2.3.9.1
Will plan holders be required to have exercised all annual requirements by end of 2016, as the new annual cycle begins on January 1, 2017?	Exercises using the 2016 PREP Guidelines are prorated for the remainder of 2016. Any exercises completed prior to June 9, 2016 under the 2002 PREP Guidelines are acceptable and count towards the plan holder’s exercise requirements.
Topic 4: SMFF Exercises – Remote Assessment and Consultation (RAC)	
Section 2.3.2 of the 2016 PREP Guidelines (pages 2-1, 2-3) state that “The remote assessment and consultation exercise must be conducted annually by each vessel in the VRP when the vessel is operating in U.S. waters, including the exclusive economic zone (EEZ); otherwise, upon entry into U.S. waters, the exercise must be conducted at least one time per vessel per year.” Does this mean that vessels who wish to take a proactive active approach to these exercises and conduct them outside of US waters, will fall out of compliance with the PREP guidelines? Or will the USCG find this acceptable?	Yes, the Coast Guard will accept a RAC exercise, even if conducted outside US waters, as long as the processes outlined in the VRP are followed, objectives met and the exercise is properly documented.
Will plan holders be required to conduct Remote Assessment & Consultation (RAC) exercises for their entire fleet during 2016?	“The remote assessment and consultation exercise must be conducted annually by each vessel in the VRP when the vessel is operating in U.S. waters, including the exclusive economic zone (EEZ); otherwise, upon entry into U.S. waters.” “This PREP exercise should be conducted during non-business hours at least once per plan per year.” 2016 PREP Guidelines, Section 2.3.2, page 2-3
When conducting remote assessment and consultation for tank barges, if the barge custodian is also the tug/towboat captain on a NTVRP regulated vessel, can both tug and barge take credit for the RAC or do they need to do the drill separately?	As described, both the towboat and the barge may take credit for the remote assessment and consultation exercise. Exercise completion must be properly documented for both vessels. The barge and tug do not need to do the drill separately. 2016 PREP Guidelines, Section 2.3.2.2, page 2-3

RAC documentation for tank barges states that the records are to be kept on board the barge or with the VRP for the barge. The documentation for the RAC drill will be kept on the specific barge that performed the RAC but does it also have to be available on all the barges in the fleet?	Per the 2016 PREP Guidelines, remote assessment and consultation exercise documentation can be maintained on the barge or with the VRP. 2016 PREP Guidelines, Section 3.5, page 3-6
What is the expected role of the QI in this exercise, and why can't this be conducted in conjunction with the QI notification?	The regulations and PREP are designed to exercise individual VRPs and the processes/procedures described therein. Therefore, the expected role and actions of a QI should be taken directly from the VRP being tested.
Does a RAC exercise need to be conducted solely with the vessel master?	See above.
Topic 5: SMFF Exercises – Equipment Deployments	
Are SMFF providers to deploy equipment annually in all COTP zones? By district? By region?	Response provider equipment must be deployed in each COTP zone. If following the NPREP Guidelines, these deployments must occur over a 3 year period (i.e. each COTP Zone over 3 years). Providers can use real-world (incident or employed) deployments to satisfy this requirement if the deployment met exercise objectives and is properly documented. 33 C.F.R. 155.4030(a); 155.4052(a); and 2016 PREP Guidelines Section 2.3.6, page 2-5, Section 2.3.6.6.2, page 2-10
Should SMFF equipment be deployed in each applicable area annually or triennially in each applicable area?	See above.
There are use scenarios where a single piece of equipment facilitates multiple missions or activities. Would this then count for both uses?	Yes, if all uses are successfully tested as part of the deployment and properly documented. 2016 PREP Guidelines, Section 3.15, page 3-17
Is the salvage assessment and marine fire fighting assessment deployment asking SMFF Providers to simulate a casualty assessment or show they can meet required response timelines to piers within a COTP Zone?	An equipment deployment exercise is an exercise during which response equipment is deployed to a specific site and operated in its normal operating environment. As a reminder, all aspects of a VRP must be tested over the course of three years. 2016 PREP Guidelines, Section 1.0 and 2.3.8

Topic 6: SMFF Exercises – Miscellaneous

<p>Are SMFF Providers expected to be involved in on-board emergency procedure exercises?</p>	<p>No. Emergency Procedures exercises are focused on a crew's response to a casualty or incident. The scope of these exercises is limited to the vessel and does not involve external parties. 2016 PREP Guidelines, Section 3.6 and 3.7, pages 3-7 and 3-8</p>
<p>If a plan holder has already completed their annual Spill Management Table Top Exercise is that company now required to complete a second Table Top Exercise in 2016 in order to meet the Shoreside Salvage and Shoreside Marine Firefighting TTXs?</p>	<p>Maybe. If an owner/operator conducted a spill management team/incident management team TTX and it addressed some SMFF elements, it can be credited as an SMFF TTX as well. If no SMFF elements were addressed/exercised, an SMFF TTX will still need to be completed.</p>
<p>Triennially each plan holder must test all VRP components applicable to their plan, if a plan holder is in the final year of a triennial cycle will they be required to test all components of the Shoreside Salvage and Shoreside marine Firefighting TTXs by the end of the year?</p>	<p>No. If, only a third of an exercise cycle remains, a plan holder is not expected to exercise the entire plan, but a commensurate portion. The plan holder should prorate for the remainder of their exercise cycle to include an annual SMFF TTX that meets the PREP objectives. It is incumbent on the plan holder to document and self certify. 2016 PREP Guidelines, Section 2.3.8, page 2-15; 33 CFR 155.4052(b)(5)</p>
<p>For emergency procedures, will the remaining two quarterly exercises (Q3 and Q4) need to include an SMFF component?</p>	<p>Yes. 33 CFR 155.4052(b)(2)</p>
<p>Will SMFF providers need to maintain a copy of the VRPs for all plan holders?</p>	<p>No, SMFF providers do not need to maintain a copy of the VRPs for all plan holders; however, per 33 CFR 155.4035(a), owner/operators must give SMFF providers the information required by 33 CFR 1035(c), 155.1040(c), and 155.5035(c). Additionally, per 33 CFR 155.4035(b)(2), vessel owner/operators are required to provide a pre-fire plan to marine firefighting resource provider(s).</p>
<p>What is the focus of the SMFF TTX and who is expected to participate?</p>	<p>Per the 2016 PREP Guidelines, the shore-based salvage and marine firefighting table-top exercises are expected to include the management team from the SMFF resource provider as defined in a VRP. Objectives are focused on the resource provider's ability to communicate and make decisions pursuant to a salvage and/or marine firefighting scenario. 2016 PREP Guidelines, Section 1.0, page 1-10, Tabletop Exercises (TTX); Sections 3.11 and 3.12, See Participating Elements, Scope, and Objectives</p>