

# ECM MARITIME SERVICES, LLC

## 2023 IMT TTX PROGRAM



**Asia**  
**October 2023**



**ECM MARITIME SERVICES LLC**  
An ECM Group Company

# 2023 IMT TTX PROGRAM

**Manila, Philippines**  
**October 9, 2023**

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**YOUR ECM TEAM**

**Nish Kapoor**

- Sr Vice President. Master Mariner with over 17 years experience on crude oil & product tankers. Managed HSEQ and Security issues for a world-renowned shipmanager in Hong Kong. Responsible for management of multiple marine insurance claims. Over 15 years of US/Canadian regulatory compliance and spill response experience. Quality & Environmental (ISO 9001/14001) + OHSAS 18001 lead auditor.

**John Linnborn**

- Manager, Southern California. Served for 32 years in the U.S. Coast Guard, retiring as a Chief Warrant Officer. Recipient of numerous awards/decorations. Extensive experience as a Port State Control Officer and Marine Casualty Investigator. Also served as a Helicopter Rescue Swimmer.



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## TODAY'S AGENDA

0900 – 0930	Coffee & Registration
0930 – 1100	Introduction + Interactive IMT TTX
1100 – 1115	Coffee Break
1115 – 1230	Continuation of IMT TTX
1230 – 1330	Lunch
1330 – 1400	Final wrap-up of IMT TTX incl Q&A
1400 – 1500	Regulatory Update
1500 – 1515	Coffee Break
1515 – 1600	Continuation of Regulatory Update
1600 – 1630	Guest Speaker – MTI Network
1630 – 1645	Closing Remarks/Adjourn



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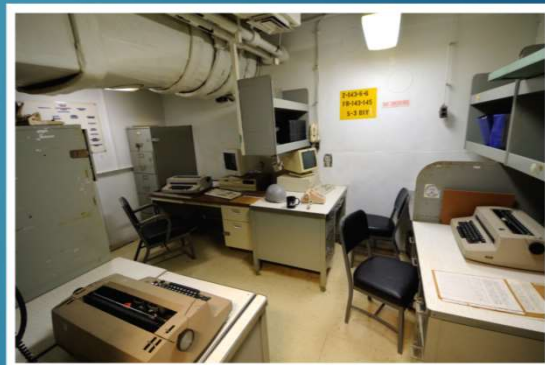
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## ADMINISTRATION

Registration – Please ensure you have signed in on the registration Sign-in Sheet.

The IMT TTX manual will be available via the QR posted at the beginning, during the breaks and at the conclusion of the exercise.

Company Name – NOTE: If you are representing a company other than the one named on the Sign-in Sheet, or more than one company, please identify the company(ies) on a blank line on the last page(s) of the Sign-in Sheet. Please be sure to write legibly.



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## POST-DRILL DOCUMENTS

- Debrief Report
- Certificate
- Self-Certification Letter template
- PREP Core Components
- California Drill Credit Letter will be emailed to you once the materials are ready

**CERTIFICATE**  
Presented to  
**Your Company Name Here**  
*In Recognition of Successful  
Completion of the*  
**INCIDENT MANAGEMENT TEAM  
TABLE TOP EXERCISE**  
Conducted on the 13th day of October 2020 via webinar, meeting the  
criteria of OPA 90 and State of California Tank / Non-tank Vessel  
Regulations using the National Preparedness for Response Exercise  
Program (PREP) Guidelines  
*Stephen Edinger*

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## WHY IS A TABLETOP EXERCISE (TTX) REQUIRED?

Under U.S. federal and California state law, a vessel owner or operator must:

- Annually conduct an exercise of its VRP with its IMT (ECM) to ensure it will function in an emergency incident.
- Receive USCG PREP (under OPA 90) and California exercise credit (if applicable).

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# CALIFORNIA DRILL CREDIT LETTERS

- ECM conducted a large-scale IMT TTX with OSPR on March 8, 2023
- **NEW:** Plan holders are not required to maintain the annual CA accreditation letter. This will be explained in more detail during the Regulatory Update.



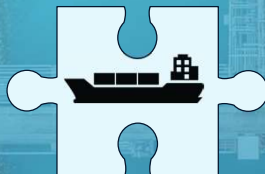
# IMT TTX TOPICS

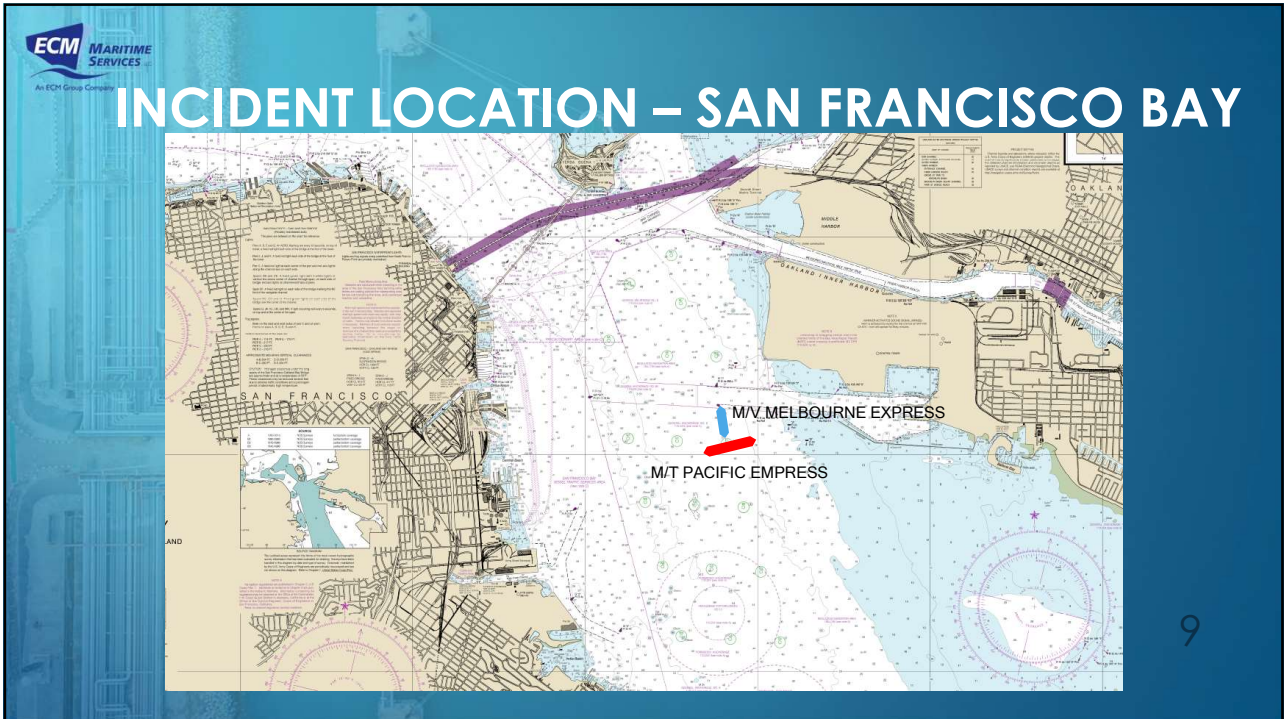
Actions taken by the vessel

Actions taken by the ECM as your QI

Actions taken by your Crisis Management Team

On-going response issues





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## IMT TTX SCENARIO

- The M/T PACIFIC EMPRESS, partly laden with 446,000 bbls of Oriente crude oil, arrived at Anchorage 9 in San Francisco Bay, coordinates 37°45'36.70"N; 122°19'50.96"W, to take on stores and lube oil bunkers before proceeding to Chevron's Longwharf Terminal at Richmond to discharge all cargo.
- Prior to her San Francisco Bay arrival, she discharged 500,000 bbls of Oriente crude at Chevron's El Segundo Terminal in Southern California, having loaded the entirety of her 946,000 bbls of cargo at the OCP Terminal in Esmeraldas, Ecuador ten days earlier.



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## IMT TTX SCENARIO

- While at Anchorage 9, the vessel's COT #2 P&S are 90% capacity, COT #4 P&S at 85% capacity and COT #6 P&S at 70% capacity with Oriente crude. The PACIFIC EMPRESS is at 32 feet even keel draft, with all ballast tanks empty except for the forepeak and afterpeak.
- There is intense fog in San Francisco Bay. The outbound container ship M/V MELBOURNE EXPRESS is arriving at Anchorage 9 under her own power when a fire breaks out in the galley. The bridge team of MELBOURNE EXPRESS, distracted by the fire, suddenly notice the PACIFIC EMPRESS as the fog clears.



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## IMT TTX SCENARIO

- The Master of the MELBOURNE EXPRESS attempts to take a series of evasive actions, but to no avail. The bow of the MELBOURNE EXPRESS impacts the port side of the PACIFIC EMPRESS at a speed of 8 knots. The impact onboard the PACIFIC EMPRESS is severe and felt by the entire crew.
- As the MELBOURNE EXPRESS disengages and drifts away from the site of the impact with visible damage to the bow, the sulfurous smell of sour crude oil is noticed almost immediately. A sheen is noted to be forming on the port side of the PACIFIC EMPRESS.

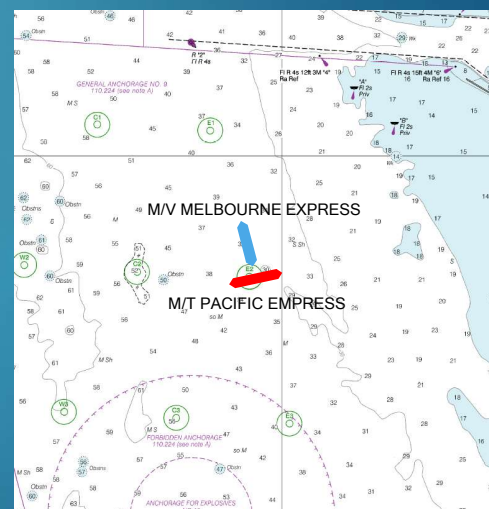


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## IMT TTX SCENARIO

- The Chief Mate does a visual check from as close as possible on deck and notices crude oil escaping from the region abreast of No. 4 port COT, which indicates the inner hull has been breached.
- Based on initial soundings, it is estimated that 8,000 bbls of crude have been discharged. The No. 4 port COT contains 78,543 bbls of crude. There are no injuries reported.



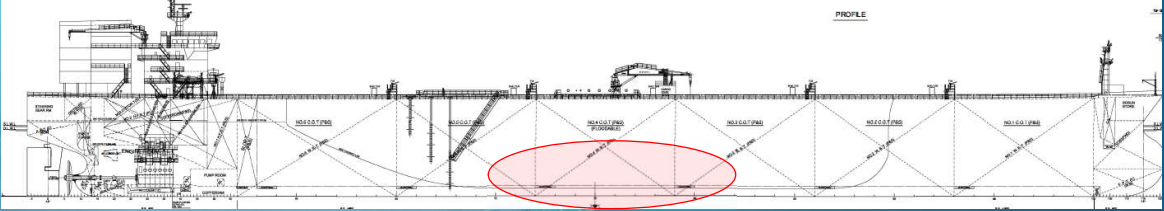
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# IMT TTX SCENARIO HULL BREACHED / PACIFIC EMPRESS



PROFILE

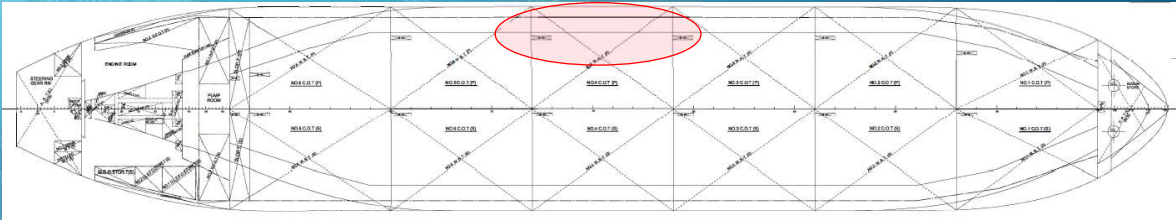
15

This slide features a technical drawing of a ship's hull profile. The drawing shows the internal structural framework, including various beams and girders. A red oval highlights a specific area on the hull, indicating a breach. The drawing is labeled 'PROFILE' in the upper right corner. The background of the slide is a dark blue gradient with a faint image of a ship's hull.

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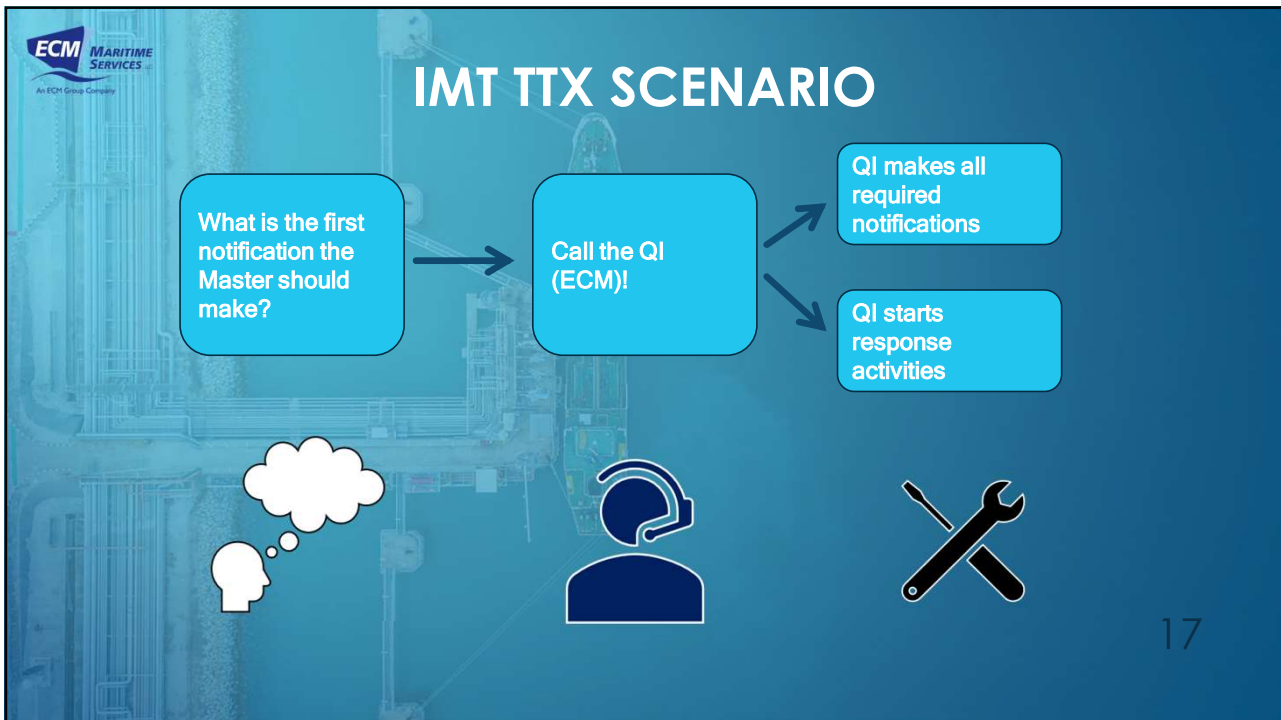
# IMT TTX SCENARIO HULL BREACHED / PACIFIC EMPRESS



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This slide features a technical drawing of a ship's hull plan view. The drawing shows the internal structural framework, including various beams and girders. A red oval highlights a specific area on the hull, indicating a breach. The drawing is labeled '16' in the lower right corner. The background of the slide is a dark blue gradient with a faint image of a ship's hull.

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## CONSEQUENCES OF IMPROPER NOTIFICATIONS

- QI/ECM response may be delayed
- Third parties (e.g. agents, pilots) may activate non-contracted resources
- USCG could assume responsibility
- Limit of liability could be removed
- USCG enforcement - fines, sanctions

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## MASTER'S INITIAL NOTIFICATION TO ECM

QI confirms actual spill and requests the following:

- Incident time and location
- Vessel name and IMO number
- Personnel injuries, fire or other emergencies
- On-scene weather
- Spill source identified
- Type of oil?



### U.S.A. EMERGENCY REPORTING PLACARD

All oil and hazardous substance spills or threat of spills and all salvage related emergencies must be reported within 30 minutes to:

**ECM MARITIME SERVICES, LLC**  
 24-hour Telephone +1.203.857.0444 -or-  
 +1.281.464.3328

AND

**USCG NATIONAL RESPONSE CENTER**  
 24-hour Telephone +1.800.424.8802 -or-  
 +1.202.267.2675

**Qualified Individuals:**

Brady, Ryan	Kearney, Brendan	Minogue, Michael
Buchanan, Scott	Likens, Justin	Naroczynski, Chris
Ceruzzi, Masro	Lincoln, Brian	Rozella, Nick
Childs, Keeleigh	Linnborn, John	Rombout, Megan
Ferrante, Charles	May, Scott	Watson, Jennifer
Kapoor, Nishit	Minogue, Brendan	

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#### QUARTERLY QI NOTIFICATION DRILL REQUIREMENTS

In accordance with OPA 90 - 33 CFR 155.1060 and CALIFORNIA CODE OF REGULATIONS, TITLE 14, a Qualified individual communication exercise must be conducted quarterly when operating in USA waters (EEZ), or upon entry into USA waters, not to exceed four (4) times per year.

These exercises may be conducted by telephone, or email (using ECM's Form 01). At least once a year this exercise is to be conducted by telephone, as this is the only accepted method of contacting the QI to report an actual incident.

**Note:** Upon completion of the notification either by email or telephone you should record the time and date in your official log. ECM will automatically email a confirmation of receipt of an electronic QI notification exercise within 24 hours of our receipt of same. If you make a QI Notification by telephone, there is no need to follow up via email. If you make a notification by email, there is no need to follow up via phone.

Version 1-2023

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## MASTER'S INITIAL NOTIFICATION TO ECM

QI requests additional information:

- Capacity of damaged tanks
- If oil is in the water? If so, how large is the spill?
- Vessel's condition
- Who else has been contacted?
- Master's contact information?



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# VRP ACTIVATION




➤ Which situations require plan activation?

When resources and personnel available on board the vessel cannot meet the needs of an actual discharge or the substantial threat of discharge from:

- Oil spill
- Engine casualty
- Grounding
- Fire
- Flooding
- Collision/allision


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# VRP NOTIFICATION PROCEDURES




<b>2</b>	<b>TANK VESSEL RESPONSE PLAN</b> NOTIFICATION PROCEDURES	
<p><b>2.0 NOTIFICATION PROCEDURES</b></p> <p>Regulation 23 CFR 153.203 Procedure for the Notice of Discharge requires that any discharge of oil or hazardous substance be reported to the USCG. "Oil" means oil of any kind (including animal and vegetable oils) or in any form of such quality that would produce a sheen on the receiving (ground and coastal waters).</p> <ul style="list-style-type: none"> <li>• in the event of an oil or hazardous materials spill or significant discharge of same, the vessel Master is required to make the notifications as listed in Chapter 2.4. (Refer to Chapters 5 and 10 for contact numbers.)</li> <li>• Notification to the USCG is also required when the incident requires the services and resources currently under contract through the vessel's salvage and marine firefighting response provider. (See Chapter 5.2)</li> <li>• Casualties, such as a grounding, collision, allision, hull failure, fire, explosion, etc., may not result in a pollution event, but all the way listed such events present a potential pollution incident and therefore must be reported. (See Chapter 9.6 for the required contact details for the salvage and marine firefighting response provider under contract for the vessel's coastguard/ship-plate.)</li> </ul> <p><b>2.1 SHIPBOARD NOTIFICATIONS:</b></p> <p><b>2.1.1 Notification to the USCG National Response Center</b></p> <p><b>2.1.2 Notification of the Qualified Individual</b></p> <p><b>2.1.3 DO NOT DELAY INITIAL REPORT -</b> If some items are unknown, state in the report that this information will be provided when the facts are available.</p>		
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2.	Qualified Individual: (See Chapter 5.2)
3.	USCG National Response Center: (See Chapter 9.2.2)
4.	State and Boundary State Agencies: (See Chapter 9.2.4 & 9.2.5)
5.	Local USCG Captain of the Port: (See Chapter 9.2.3)
6.	OSRO (See Chapter 9.3) and/or SMFF (See Chapter 9.6)
7.	Owner / Operator / Manager: (See Chapter 10.9)
8.	P&I Club, Hull Underwriter: (See Chapter 10.11 & 10.12)
9.	Damage Stability / Class Society: (See Chapter 10.13 & 10.14)

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# MASTER'S CONTACT INFORMATION

## Chapter 5 of TVRP

**5**      **TANK VESSEL RESPONSE PLAN**      Chapter 5  
LIST OF CONTACTS      Page No. 1 of 2  
Rev. No. 6/2023      Date: 04/01/23

**5.0 LIST OF CONTACTS**

**5.1 OWNER / OPERATOR / MANAGER:**  
See Chapter 10.9 of this plan.

**5.2 QUALIFIED INDIVIDUAL & INCIDENT MANAGEMENT TEAM:**

Company:	ECM MARITIME SERVICES, LLC		
Address:	43 Dabney Road Wilton, CT 06097		
24 Hour Telephone:	+1.203.887.0444 or +1.281.464.3328		
Fax:	+1.203.887.0428		

**Qualified Individuals & Alternates:**

Brady, Ryan	Konney, Brendan	Miroque, Michael
Brinkley, Scott	Leves, Justin	Napierkowski, Chris
Crispin, Mauro	Lynch, Brian	Rosolia, Nick
Chish, Kasey	Lynnson, John	Rothford, Megan
Farrarite, Charles	May, Scott	Watson, Jennifer
Kaport, Nishi	Morgan, Brendan	

**5.3 P&I CLUB:**  
See Chapter 10.11 of this plan.

**5.4 HULL UNDERWRITER:**  
See Chapter 10.12 of this plan.

**5.5 CLASSIFICATION SOCIETY:**  
See Chapter 10.13 of this plan.

**5.6 24 HOUR SHORE-BASED COMPUTERIZED DAMAGE STABILITY CALCULATIONS PROVIDER:**  
See Chapter 10.14 of this plan.

**5.7 LOCAL AGENT:**  
As per voyage/charter instructions or Owner/Operator's Agency List.

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## Chapter 9.2 of TVRP (GSAs)

**9.2 – 9.6**      **Geographic-Specific Appendix**      Chapter 9  
COTP Zone SAN FRANCISCO      GSA 35  
Page No. 1 of 2  
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**9.2 – 9.6**      **Geographic-Specific Appendix**      Chapter 9  
COTP Zone SAN FRANCISCO      GSA 35  
Page No. 1 of 2  
Rev. No. 2023

**9.2 NOTIFICATIONS:**

Agency	24-Hour Phone No.	Secondary Phone No. (if applicable)
<b>9.2.1 Qualified Individual:</b>	See Chapter 5.2	
<b>9.2.2 Federal:</b>	USCG National Response Center: +1.800.424.8802      +1.202.267.2675	
<b>9.2.3 Local USCG:</b>	USCG Sector San Francisco: +1.415.399.9541      +1.415.399.3030	
<b>9.2.4 State Agency:</b>	CA Office of Emergency Services: +1.800.862.7550      +1.916.644.8011	
<b>9.2.5 CA DFW/OSPR:</b>	+1.800.862.7550      +1.916.445.8338	
<b>9.2.6 Boundary State:</b>	N/A	
<b>9.2.7 Incident Management Team:</b>	See Chapter 5.2	

**9.3 CONTRACTED OIL SPILL REMEDIAL ORGANIZATIONS (OSRO) & DISPERSANT & AERIAL OIL TRACKING & OBSERVATION RESOURCE SERVICE PROVIDER:**

See Chapter 9.1.3 regarding the average most probable discharge (AMPD) response capabilities for transfer operations in the response environment. This resource is covered in this plan since it conducts transfer operations in the ocean environment in this zone.

OSRO:	Classification:	24 Hour Phone No.	Secondary Phone No.
National Response Corp. (NRCOS)	see ref. SEC 1, GCI, OIS, IUS	+1.877.886.4672	+1.631.224.9141
Morco Oil Response Corp.	see ref. SEC 1, GCI, OIS, IUS	+1.800.258.6772	+1.703.326.6609

**9.4 ADDITIONAL RESOURCES - Non-Contracted OSRO:**

OSRO:	Classification:	24 Hour Phone No.	Secondary Phone No.
Chem-Harbors	IM, WQ, W3, I, SAC	+1.800.443.6203	
Parsons Env. Services, IM, I, SAC		+1.800.624.9336	+1.562.426.2014

**9.5 PLANNING VOLUMES:**  
The vessel-specific information and spill planning volumes can be found in Chapter 10.16.

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# IMT TTX TOPICS

**Actions taken by the vessel**

**Actions taken by the ECM as your QI**

**Actions taken by your Crisis Management Team**

**On-going response issues**



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## ECM'S INITIAL ACTIONS

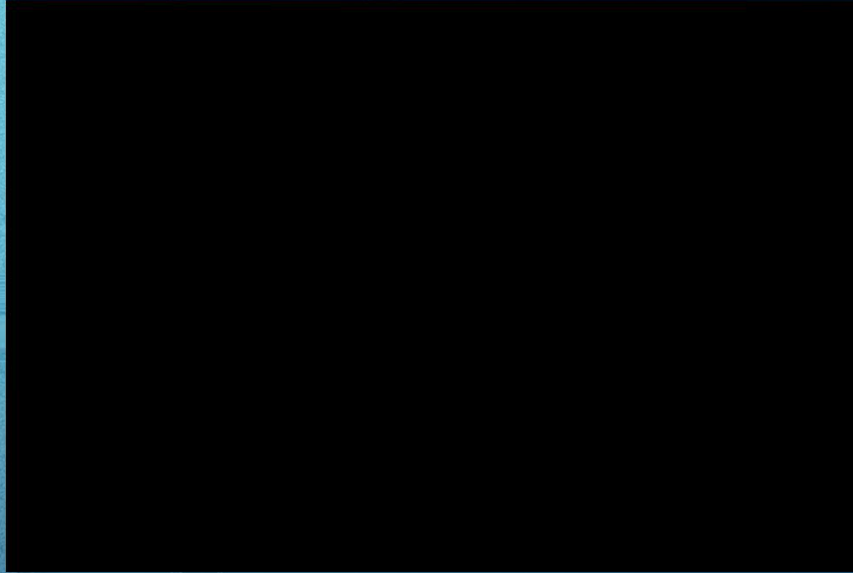
- Make required notifications
- Mobilize our IMT to the spill
- Establish coordinated response with USCG and California Dept of Fish and Wildlife – Office of Pollution and Spill Response (OSPR)
- Establish an Incident Command Post (ICP)
- Provide initial briefing at ICP
- Use the Incident Command System for response



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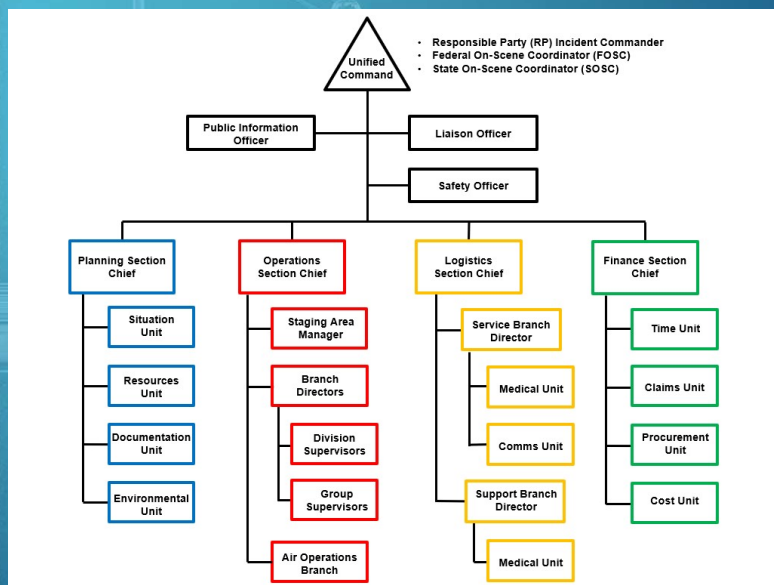
# RESPONSIBLE PARTY INITIAL BRIEFING



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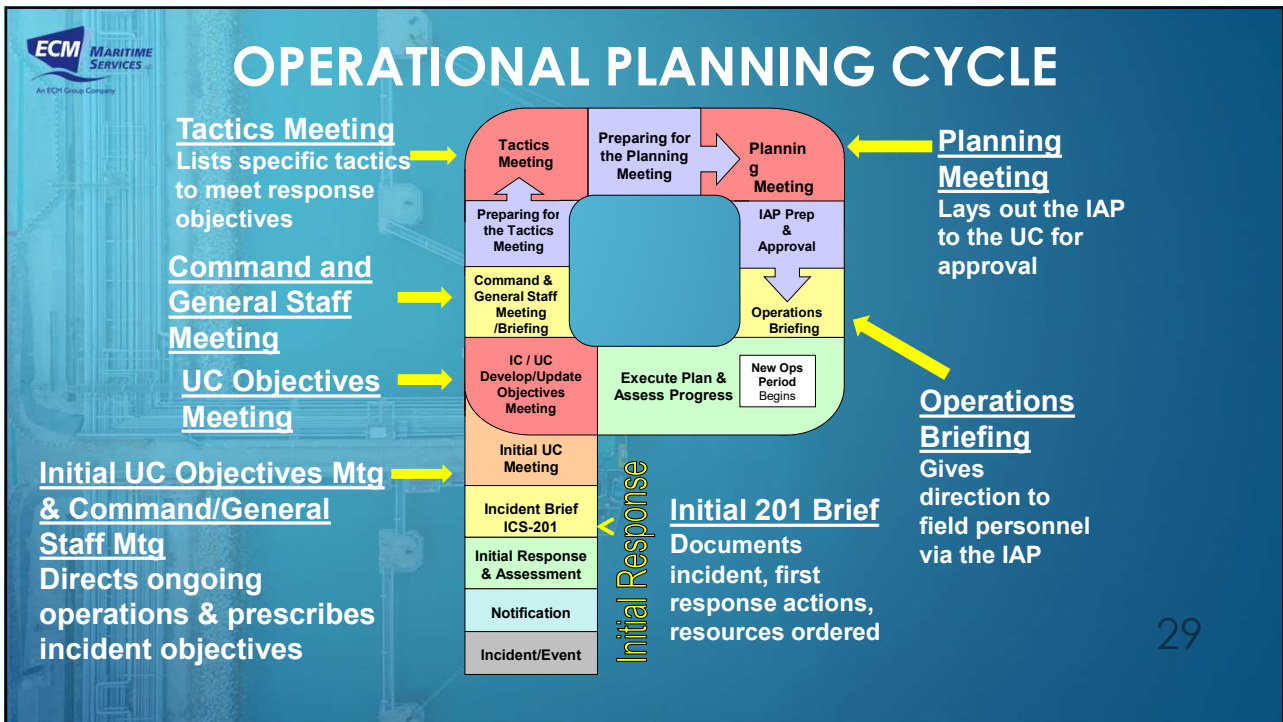
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# ICS ORGANIZATION CHART



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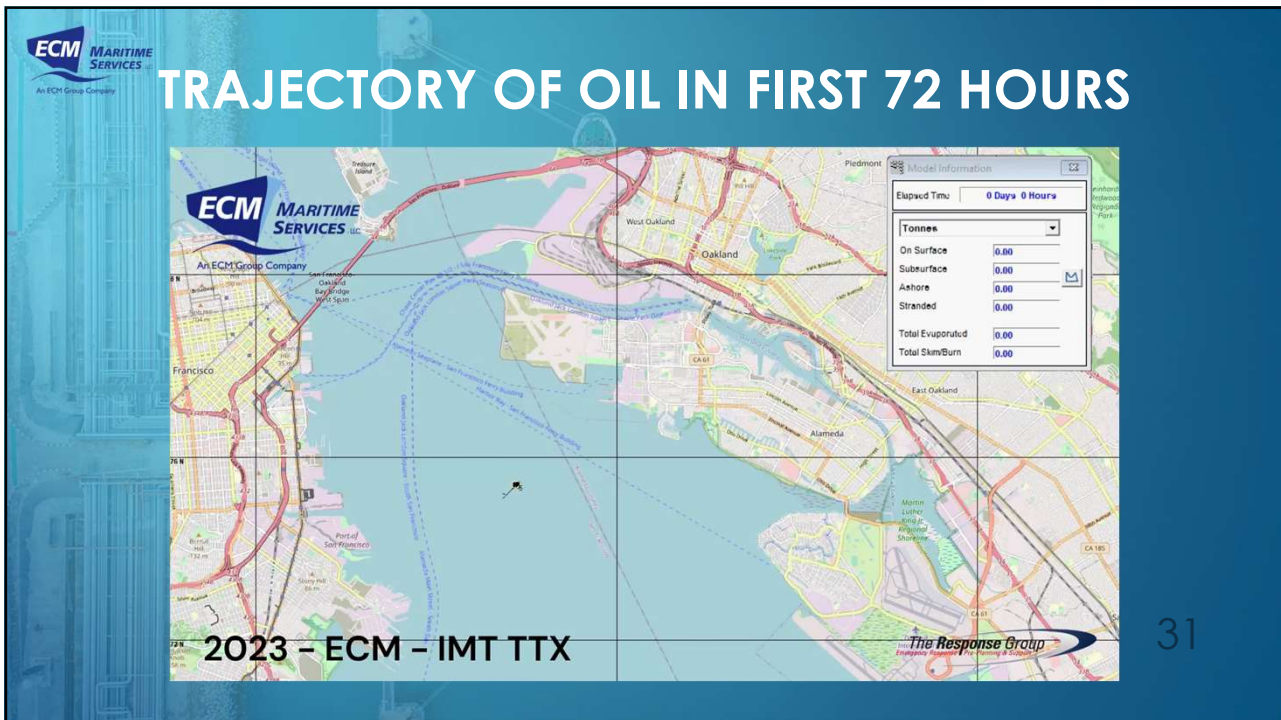
## INITIAL INCIDENT (“201”) BRIEFING

- Purpose of initial briefing – provide status report on initial response actions and hand off responsibility to the Unified Command (RP IC – ECM, USCG, State of California and Local Representative).
- Includes initial objectives and response resources ordered.

5. Initial Response Objectives, Current Actions, Planned Actions	
<b>INITIAL RESPONSE OBJECTIVES</b>	
1.	Ensure the safety of vessel crew, response personnel and the public.
2.	Form a Unified Command organization to coordinate response activities.
3.	Secure the scene and immediate area surrounding collision site.
4.	Secure/control/contain spill source.
5.	Continue damage assessment and salvage related activities.
6.	Maximize oil recovery and aggressively respond to the spill to minimize impacts.
7.	Deploy GRPs & protection strategies as per the San Francisco Area Contingency Plan.
8.	Keep stakeholders/public informed in a timely manner.

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## INITIAL SPILL RESPONSE RESOURCES

First response assets on-scene in first 2 to 4 hours:

- 5 skimmers
- 45,300' containment boom
- Personnel
- Response Boats
- Response Trailer
- Portable Barge
- Tugs (3)

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## SECTOR SAN FRANCISCO AREA CONTINGENCY PLAN (ACP)

- Establishes USCG and State spill response policies and procedures.
- Identifies geographic specific response strategies to protect environmentally sensitive sites.

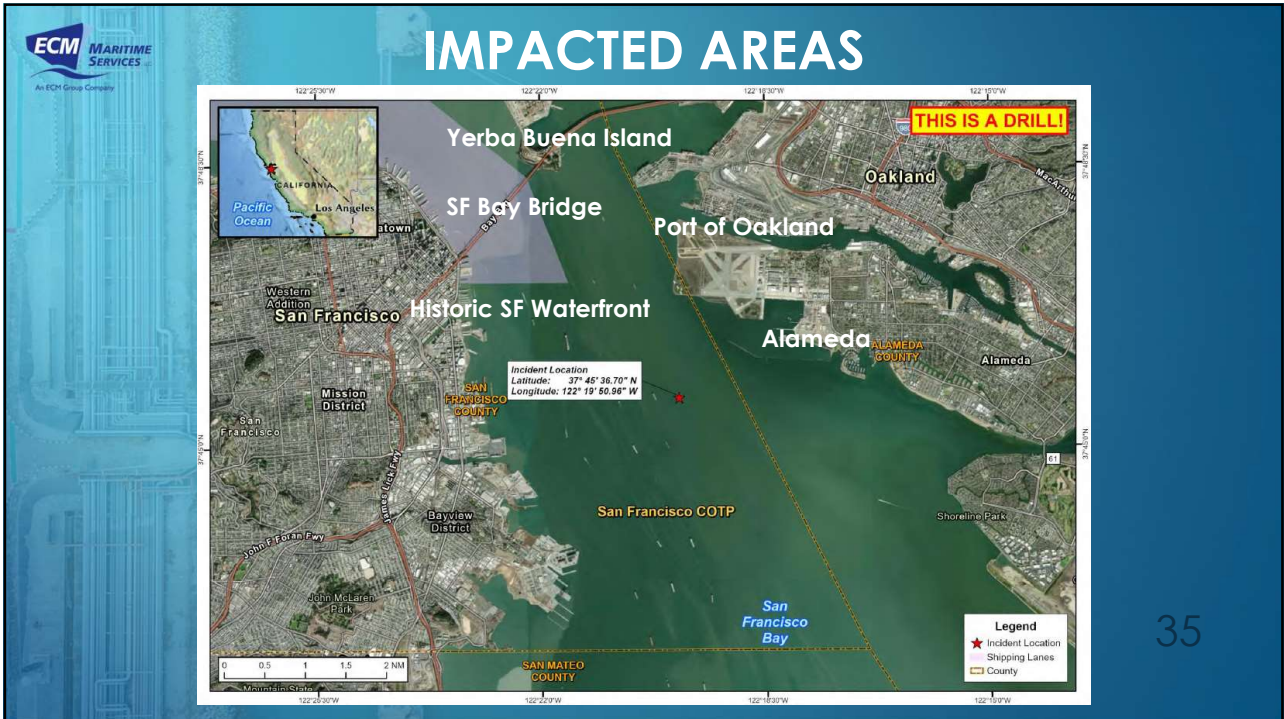
### Sector SF Area Contingency Plans (ACP)

Volume II: Section 9800 - Area Committee Detail  
for ACP 1 – North Coast  
ACP 2 – San Francisco Bay and Delta  
ACP 3 – Central Coast  
June 2022

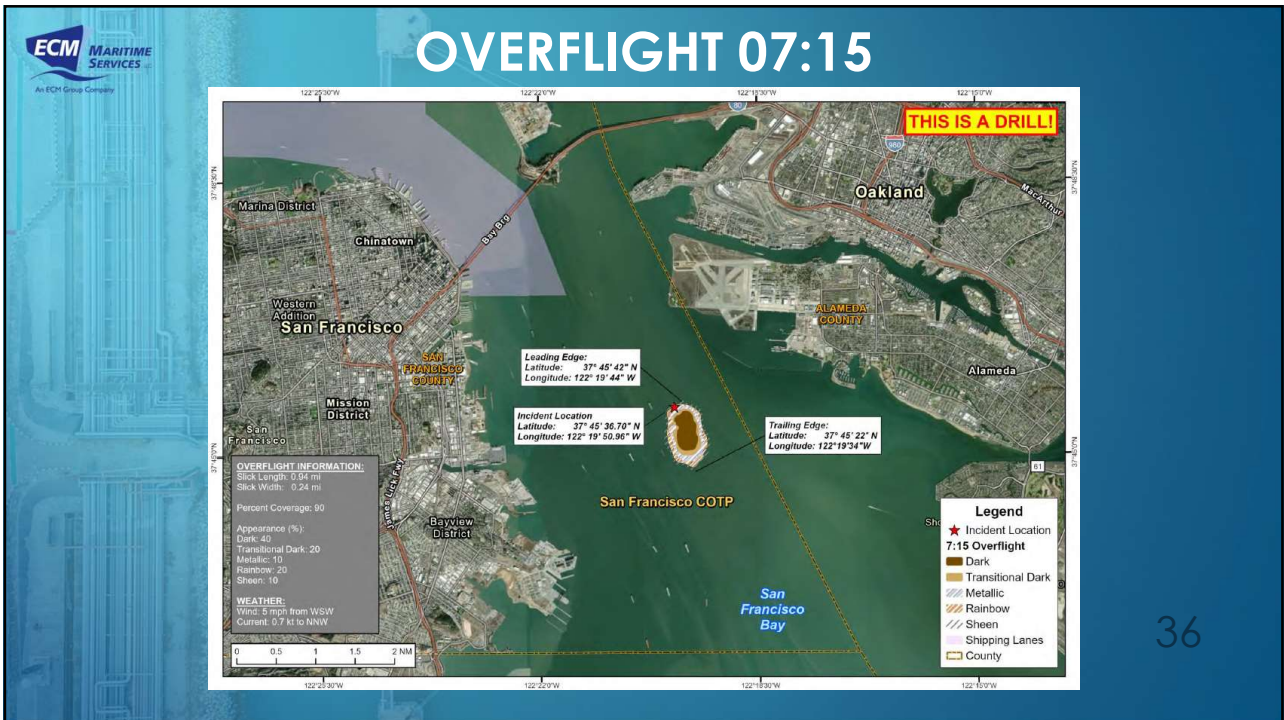
Emergency Spill Notification Numbers  
National Response Center 1-800-424-8802  
California Office of Emergency Services 1-800-852-7550

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## USCG EXPECTATIONS



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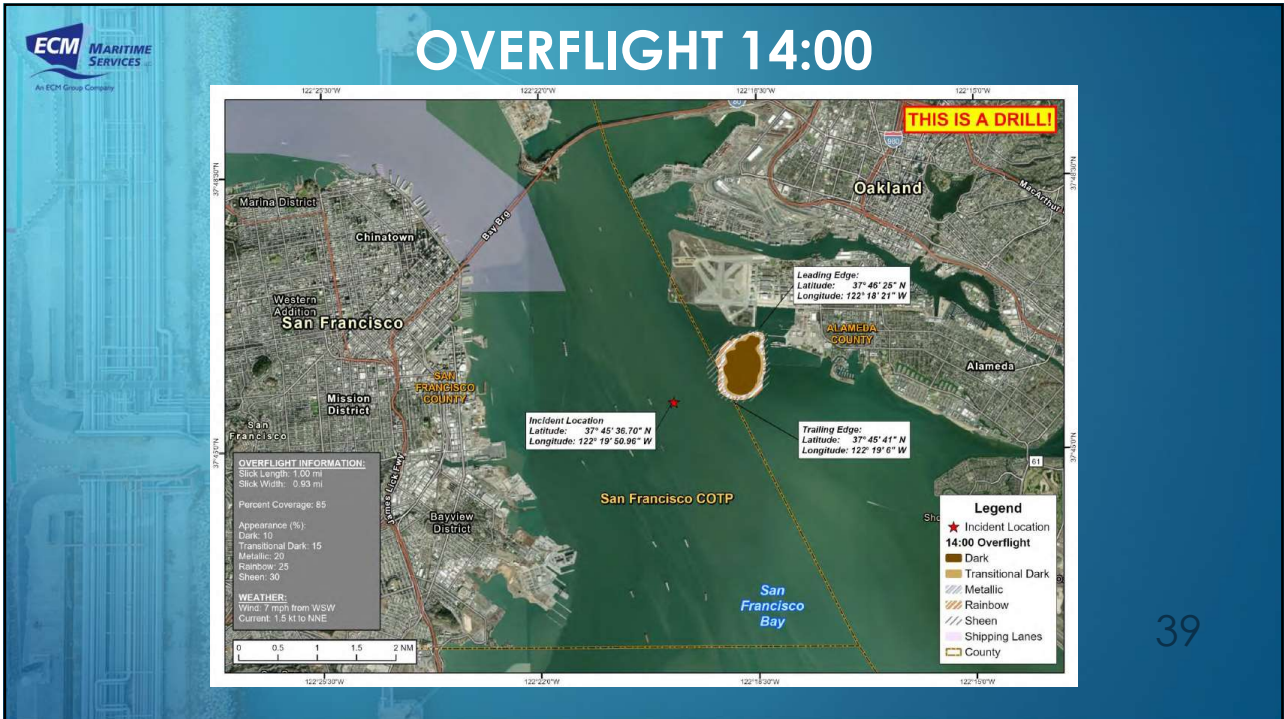
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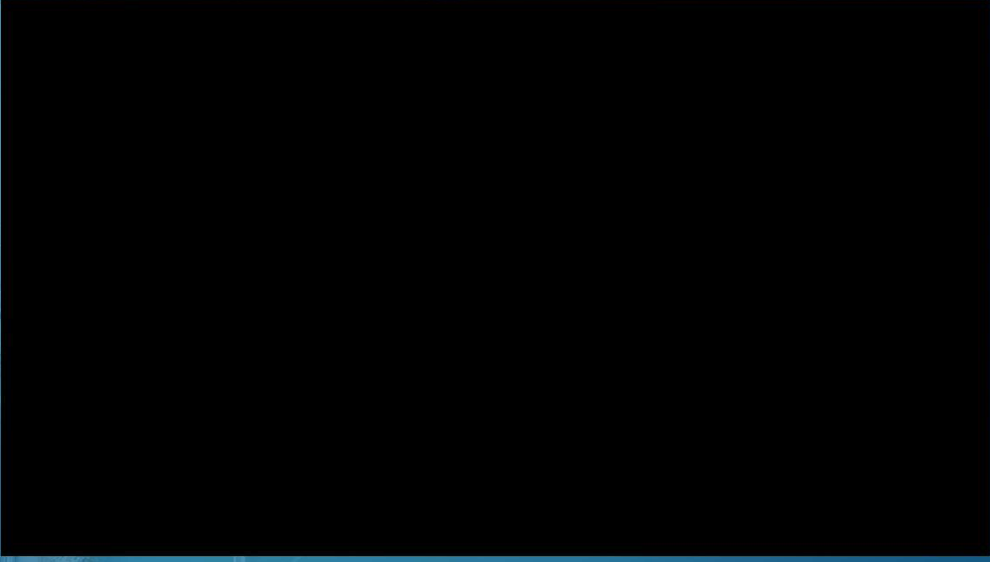
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# INCIDENT COMMAND POST



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## SMFF – NOTIFICATION AND INFORMATION NEEDS

- QI Immediately notifies SMFF provider so a remote assessment can be done with the Master.
- SMFF provider needs technical information from the vessel Master or owner/operator including:
  - Trim and stability booklet
  - Capacity/general arrangement plans
  - Ship model, if available
  - Vessel loading condition (e.g., cargo, ballast tanks)
  - Vessel draft readings
  - On-site weather



**RESOLVE MARINE GROUP**


**DONJON SALVAGE**

**SMIT**



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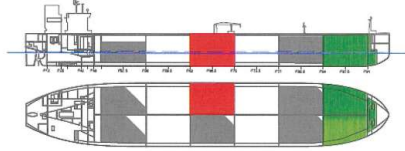
T&T Salvage – PACIFIC (02 Mar 2023)  
HECSALV 9 8.1.0518 (14 Nov 2022)

Printed at: 12:38 on 08 Mar 2023  
Condition Summary

## SALVAGE PLAN


- Damage assessment is underway:
  - Vessel is stable in current position
  - Breach in hull
- Salvage plan includes:
  - Safety plan
  - Refloat plans
  - Engineering assessment
  - Temporary repair plan
  - Environmental conditions
  - Tow plan
  - Dive plan

Damaged Condition-1-1  
Condition Summary




Stability		Trim	
GMH Upright (Computed)	41.60 ft	Specific Gravity	1.025
GMH @ Equal	41.63 ft	LCF Draft	32.96 ft
		LCB	17.83F R-MS
		LCF	35.23F R-MS
		LOD	31.61F R-MS
		VCB	16.17 R-BL
		TCB	4.26S R-CL
		TOG	0.68F R-CL
		TPIn	272 LTIIn
		MTIn	14.262 R-LTIIn
		Tim at Perps	1.05F ft
		Heel Angle	1.59F deg
		Propeller Immersion	108.72 %
Drafts - Perps		Drafts - Marks	
AP	32.41 (32-4.9) ft	AH	32.49 (32-6.5) ft
MS	32.94 (32-11.2) ft	Mid-P	32.25 (32-1.0) ft
FP	33.45 (33-6.6) ft	Mid-G	30.79 (30-8.4) ft
		Pwd	33.40 (33-4.8) ft
Strength -At Sea-			
Shear (Inv)	-8.96F LT	168.28F R-MS	79.28 %
Shear (Max)	7.03Z LT	161.25A R-MS	82.87 %
Shear (Max %Allow)	-8.96F LT	168.09F R-MS	79.28 %
Moment (Max Hog)	905.401H R-LT	101.35A R-MS	— %
Moment (Max Sag)	— R-LT	— R-MS	— %
Moment (Max %Allow)	903.898H R-LT	106.35A R-MS	68.80 %
Bridge Visibility - Criterion			
Actual	015.13 ft	Required	<1,040.42 ft
<b>Notes</b>			
Drafts from Keel			
Hull from Offsets			
GMH from GC Curve Slope			
Tanks from Tables			

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## SALVAGE PLAN


- Internal transfer of cargo from damaged port cargo tank #4 to port cargo tank #5
- Port ballast tank #4 pumped via over-the-top transfer to starboard cargo tank #3
- Approx. 4,000 bbls of cargo to be transferred from port cargo tank #4 to starboard slop tank
- Conduct dive assessment
- Evaluate topside damage
- Develop temporary repair and patching plan



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# SALVAGE AND OPA 90




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# IMT TTX TOPICS

*Actions taken by the vessel*      *Actions taken by the ECM as your QI*      *Actions taken by your Crisis Management Team*      *On-going response issues*



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## CRISIS MANAGEMENT TEAM ACTIONS

- Status of SMFF response?
  - Are they communicating with the vessel and CMT?
  - Are they being provided all necessary information? Who is coordinating operational and contracting issues with the SMFF? With H&M?
  - The QI will coordinate these issues with the SMFF provider and the company.
- Contact media representative, set up webpage and phone number(s) to address concerns from crew's family and public.
  - Develop initial press statement.
  - Develop/distribute statement to Company staff for press inquiries.
  - Provide a copy to QI to review prior to release.



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## CRISIS MANAGEMENT TEAM ACTIONS

- Drug and Alcohol Testing
  - What is the timeframe to conduct alcohol testing and obtain drug samples?
    - 2 hours and 32 hours, respectively
  - Can the Master do drug sampling or is outside assistance required?
  - Agent's role? QI's role?




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# USCG NOTICE OF DESIGNATION



Commanding Officer  
U.S. Coast Guard Sector San Francisco  
1 YERBA BUENA ISLAND  
San Francisco, CA 94130  
Primary Phone: (415) 399-3547

**“M/T PACIFIC EMPRESS is designated as the source pursuant to the Oil Pollution Act of 1990”**

**“You are liable for removal costs and damages, as specified in 33 USC 2702.”**

**“You must advertise the procedures by which persons that have claims for removal costs and damages may submit their claims to you.”**

Captain of the Port Sector San Francisco

End: (1) Scope of Advertisement and Content of Advertisement

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## CAPTAIN OF THE PORT ORDER

- Activate the Vessel Response Plan including salvage and marine firefighting (SMFF) resources.
- Provide the Captain of the Port with continual updates of the vessel's condition and provide stability calculations ASAP.
- Conduct routine soundings of all tanks and internal structures to monitor further damage and oil loss.
- Conduct an underwater hull survey and provide report to USCG.



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## CAPTAIN OF THE PORT ORDER

- Vessel is NOT allowed to move without approval of the Captain of the Port.
- All repairs and/or modifications to the vessel must be completed to the satisfaction of Class and a survey report submitted to the Captain of the Port for review.
- Salvor must submit a proposed repair/salvage/transit plan to USCG for approval prior to vessel movement.
- South San Francisco Bay is closed to marine traffic.

U.S. Department of Homeland Security  
United States Coast Guard

Captain of the Port  
U.S. Coast Guard  
Sector San Francisco  
1 YERBA BUENA ISLAND  
San Francisco, CA 94130  
Primary Phone:  
(415) 399-3547

March 8, 2023

Master: *MT PACIFIC EMPRESS*  
FALCON SHIP MANAGEMENT  
123 Main Street  
Singapore

CAPTAIN OF THE PORT ORDER 23-026: *MT PACIFIC EMPRESS*

Dear Vessel Master,

On March 8, 2023, my office received notification that the *MT PACIFIC EMPRESS* experienced a collision and oil spill in San Francisco Bay. I hereby order the following concerning the operation of *MT PACIFIC EMPRESS*:

1. Activate the Vessel Response Plan including salvage and marine firefighting resources.
2. Implement all necessary safety procedures to minimize potential impacts to the crew, emergency response personnel, vessel and environment. Provide documentation to this office.
3. Provide the Captain of the Port with continual updates of the vessel's condition. Provide stability calculations as soon as possible. Conduct routine soundings of all tanks and internal structures to monitor further damage and cargo loss.
4. Provide tugs of adequate size, horsepower and bollard pull to maintain positive control of the vessel in all expected weather conditions until safely moored to a shore-side facility.
5. Conduct an underwater hull survey and provide documentation attesting to the condition of the vessel.
6. Vessel is not allowed to move from present location without approval of the Captain of the Port.
7. All repairs and/or modifications to the vessel must be completed to the satisfaction of Class and a survey report submitted to the Captain of the Port for review.

This order is given to you under the authority of the Clean Water Act (33 USC 1321B3) and the regulations promulgated there under (33CFR6 04-08). Corrective action is **REQUIRED** before departure from San Francisco Bay. Title 33 USC 1323 prescribes that "whoever violates an order issued under the authority of the Port and Waterways Safety Act is liable for a civil penalty of not more than \$60,000 for each violation. Each day of a continuing violation shall constitute a separate violation. Any person who willfully and knowingly violates this order may be fined or imprisoned for committing a Class D felony. Your vessel may be seized and held liable for any monetary assessments.

Should you be aggrieved by this order, you may request reconsideration by appeal under the procedures as prescribed in Title 33 Code of Federal Regulation, Part 160.7. This request may be made orally or in writing, however, if the initial appeal is made orally, a written submission is required within five days of the oral presentation.

Sincerely,  
Taylor Lam  
Captain, U.S. Coast Guard  
Captain of the Port SECTOR SAN FRANCISCO

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## P&I CLUB INITIAL ROLES

- Ensure all notifications and required activations completed
- Assist the vessel and crew
- Address 3<sup>rd</sup> party claims – establish procedure
- Conduct a thorough investigation
- Support their clients throughout the process









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## SOCIAL MEDIA RECOMMENDATIONS

Social media from both local citizens and from crew members play an important part in the response.

Remind crew of social media policy.

It is important to control the flow of information, so we are sure the proper information is going out.

A media consultant can respond to media questions and monitor what is going in the media – including social media.

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## SOCIAL MEDIA RECOMMENDATIONS

Don't release/post photos or videos on any social media platforms.

Direct all questions from the media or public to the JIC, once it is formed.

Don't discuss the response and/or incident on any media platform.

Contact your immediate supervisor or JIC if you have any questions.










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## CRISIS MEDIA RECOMMENDATIONS

- Have a designated media representative BEFORE THE INCIDENT. The following materials should be available for release:
  - Company History & Mission Statement
  - Executive Profiles
  - Drug and Alcohol Policies
  - Commendations for Days Without Incident
  - Safety & Security Management Profiles and Performance



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## CRISIS MEDIA RECOMMENDATIONS

- Press Conference/TV Interviews:
  - Sharp dress and appearance
  - Be well rested
  - Be animated and attentive to the interviewer
  - Answer questions and present message within 30 seconds



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# PRESS BRIEFING

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This slide features the ECM Maritime Services logo in the top left corner. The main content area is a large black rectangle, which is currently blank. The slide number '57' is positioned in the bottom right corner.

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# IMT TTX TOPICS

*Actions taken by the vessel*      *Actions taken by the ECM as your QI*      *Actions taken by your Crisis Management Team*      *On-going response issues*

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The slide displays the ECM Maritime Services logo at the top left. The title 'IMT TTX TOPICS' is centered. Below the title, four puzzle pieces are arranged horizontally, each with a corresponding text label above it. The first piece shows a ship icon and is labeled 'Actions taken by the vessel'. The second piece shows the ECM Maritime Services logo and is labeled 'Actions taken by the ECM as your QI'. The third piece shows three stylized human figures and is labeled 'Actions taken by your Crisis Management Team'. The fourth piece shows a circular flow diagram with a question mark, an 'X', and a checkmark, labeled 'On-going response issues'. The slide number '58' is in the bottom right corner.

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# USCG & STATE INVESTIGATION

USCG and State investigations are separate from spill response activities.

Investigation goal is to determine cause of incident, and to determine if there is a criminal element.


USCG and State investigation teams will board vessel as soon as practical to begin evidence collection.

Examples of evidence: Written statements, crew interviews, ships records, VDR data, fuel/cargo samples.




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## WILDLIFE

- Recovering and rehabilitating injured wildlife is specialized and labor intensive. It requires experts in the field.
- Animal survival rates have increased up to 90% when animals are recovered early.




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# NATURAL RESOURCE DAMAGE ASSESSMENT (NRDA)

**NRDA – Regulatory approach that places a monetary value on the environmental damages from a spill.**

**NRDA is a high priority for states and U.S. government.**

**NRDA monetary damages equal total costs of environmental losses (i.e., wildlife, habitat, public access) until the environment is fully recovered.**

**Very expensive and often exceeds spill cleanup costs.**

**May take 10 years or more to settle.**

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# ROLE OF THE OSRO

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# IMT TTX TOPICS

Actions taken by the vessel

Actions taken by the ECM as your QI

Actions taken by your Crisis Management Team

On-going response issues

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# THANK YOU!

Nish Kapoor, John Linnborn  
Phone: +1 203-857-0444  
E-mail: [ecm@ecmmaritime.com](mailto:ecm@ecmmaritime.com)

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# REGULATORY COMPLIANCE UPDATE

## October 2023

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### TOPICS

- ▶ Vessel Response Plan Update
- ▶ APC Requirements for US Remote Areas
- ▶ QI Notifications
- ▶ SMFF Required Exercises
- ▶ California Update
- ▶ Washington Update
- ▶ ECA Update
- ▶ Requirements for EPL-equipped vessels
- ▶ Right Whale Ship Strike Reduction
- ▶ Canada Update
- ▶ Panama Canal Update
- ▶ USCG Port State Control (PSC) Statistics for 2022
- ▶ US Ballast Water Management Regulations
- ▶ Vessel General Permit (VGP) and VIDA
- ▶ Cyber Safety and Security




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## USCG VESSEL RESPONSE PLAN UPDATE – SUBMISSION REVIEW AND TIMELINES

- New VRP submissions = 60 days
- Vessel addition/additional operating area to an existing VRP = 30 days before
- Plans and revisions are reviewed in the order in which they are received.
- USCG COFR = 21 days




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## USCG VESSEL RESPONSE PLAN UPDATE – SUBMISSION REVIEW AND TIMELINES

- Imperative to notify ECM of urgent ETAs when adding vessels
- Expedited requests are not accepted by the USCG
- A One Time Waiver (OTW) can be used if USCG VRP approval is not issued prior to arrival



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## ALTERNATIVE PLANNING CRITERIA (APC): WESTERN ALASKA, GUAM & AMERICAN SAMOA



**Western Alaska**




**American Samoa**



**Guam**


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### WESTERN ALASKA APC

Vessels operating in or transiting through Western Alaska COTP zone must be covered by an Approved APC

- Vessels operating within 200 nm of the shoreline and not in innocent passage must comply.
- Limiting latitude 47° 50' N
- There are currently 2 USCG approved APCs for Western Alaska:
  - Alaska Chadux Network (ACN)
  - 1-Call Alaska



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## GUAM AND AMERICAN SAMOA APC

- TVs & NTVs must arrange a contract with a local oil spill removal organization (OSRO)
- Obtain VRP approval letter with Guam and/or American Samoa included
- **UPDATE:** The USCG has decided to remove the APC expiration dates. The VRP annual review will be used to verify compliance.



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## PANAMA CANAL UPDATE


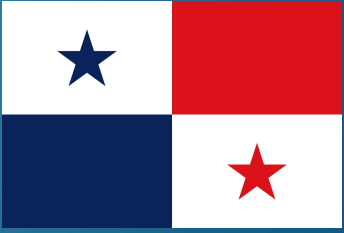
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## PCSOPEP UPDATE

- PCSOPEPs to be submitted to the Panama Canal Authority (ACP) at least 96 hours prior to arrival in Canal waters
- ECM automatically makes the PCSOPEP submission on your behalf - No action required by vessel or office
- Electronic Notice of Acknowledgement (NOA) issued by ACP directly to vessel, local agent & ECM prior to first Canal transit, after receipt of vessel's notice of arrival (new procedure for 2021)
- NOA valid for 4 years - ECM will resubmit PCSOPEP prior to expiration of current NOA
- New NOA will be issued by the ACP prior to next Canal transit, after expiration of existing NOA





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## Panama Canal – New “Disruption Charge”



**Advisory to Shipping No. A-38-2022**

December 16, 2022

**TO :** All Shipping Agents, Owners, and Operators

**SUBJECT:** Additional Information Regarding the Complementary Tariffs Effective January 1, 2023

In reference to the Complementary Tariff changes announced in Advisory to Shipping A-34-2022, the following additional information is provided:

**1. Disruption Charge:** The purpose of this charge is to minimize the possibility of delays and/or disruptions to the operation by reducing vessel incidents during transit and encouraging vessels to fix the deficiencies or report them in a timely manner if they cannot be corrected.

This charge is applicable to vessels that present deficiencies that arise during transit. The charge will be classified as low or high, depending on the type of deficiency and the time it is reported or detected. The disruption charge will be in addition to other applicable maritime service charges such as tugs, line handlers, moorage, and pilotage. Some deficiencies that may cause the application of the disruption charge are:

- a. Anchor missing or anchor windlass inoperative
- b. Inoperative Bow thruster
- c. Non-compliant Chocks and bits
- d. Compressor or air problems
- e. Inoperative Rudder angle indicators and other navigation equipment
- f. Inadequate boarding facilities
- g. Inoperative whistle
- h. Engine or propeller problems
- i. Excessive draft or drag
- j. Bridge wings do not extend to side of vessel
- k. Protruding cargo or visibility obstructed by cargo or cargo gear
- l. Inadequate sanitary facilities
- m. Inoperative or improper Air Conditioning system**
- n. Slow winches
- o. Wires on drums
- p. Fuel not in compliance with the Panama Canal's maneuvering fuel requirements

It is important to report in the “visit remarks” of the vessel's visit itinerary in VUMPA prior to the vessel's arrival, any known deficiencies or conditions that may be present during transit. A list with the most common deficiencies and other important information may be found in our webpage at the following link: <https://pancanal.com/en/oms/>


1086.0000	Disruption charge	Tariff	Status
1086.0001	Low impact (regular, length overall < 300 feet).	\$ 15,000.00	new
1086.0002	Low impact (regular, length overall ≥ 300 feet).	\$ 20,000.00	new
1086.0003	Low impact (super).	\$ 40,000.00	new
1086.0004	Low impact (neopanamax/panamax plus).	\$ 65,000.00	new
1086.0005	High impact (regular, length overall < 300 feet).	\$ 49,000.00	new
1086.0006	High impact (regular, length overall ≥ 300 feet).	\$ 65,000.00	new
1086.0007	High impact (super).	\$ 125,000.00	new
1086.0008	High impact (neopanamax/panamax plus).	\$ 250,000.00	new

**One ECM client vessel has already been fined over \$125,000 for inoperable air conditioning during a canal transit!**

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## REQUIRED EXERCISES – OPA 90 & STATE OF CALIFORNIA



*Note: Refer to ECM GD-11*

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## SMFF EXERCISES


SMFF regulations have 3 specific exercises that impact Plan Holders or Vessels:

- 1** Remote Assessment and Consultation (RAC) exercise\* initiated by the vessel.
- 2** Annual shored-based salvage management team exercise.
- 3** Annual shore-based marine firefighting management team exercise.

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*Note: Refer to ECM Client Alert 24-2018*

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## RAC EXERCISES

Who must conduct a RAC Exercise?


- One vessel per plan holder must conduct a RAC Exercise once every three years
- Contact your SMFF provider directly for details on conducting the RAC exercise
- Chapter 7.2.6 of the VRP provides an overview of this exercise

NOTE: The RAC exercise may be conducted outside U.S. waters, if desired




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## ECM EMERGENCY PLACARD

- ECM Placard indicates Qualified Individual (QI) names
- To be used in the event of any emergency, not just oil spills
- Summary of QI Notification Requirements
- Must be posted on the bridge when operating in US waters



### U.S.A. EMERGENCY REPORTING PLACARD

All oil and hazardous substance spills or threat of spills and all salvage related emergencies must be reported within 30 minutes to:

**ECM MARITIME SERVICES, LLC**  
 24-hour Telephone +1.203.857.0444 or +1.281.464.3328

AND

**USCG NATIONAL RESPONSE CENTER**  
 24-hour Telephone +1.800.424.8802 or +1.202.267.2675

**Qualified Individuals:**

Brady, Ryan	Keavney, Brendan	Minogue, Michael
Buchanan, Scott	Likens, Justin	Navoczynski, Chris
Cenzuzi, Miara	Lincols, Brian	Ricotta, Nick
Childs, Keeleigh	Linnborn, John	Rombout, Megan
Ferrante, Charles	May, Scott	Watson, Jennifer
Kapoor, Nishit	Minogue, Brendan	

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### QUARTERLY QI NOTIFICATION DRILL REQUIREMENTS

In accordance with OPA 90 - 33 CFR 155.1060 and CALIFORNIA CODE OF REGULATIONS, TITLE 14, a Qualified Individual communication exercise must be conducted quarterly when operating in USA waters (EEZ), or upon entry into USA waters, not to exceed four (4) times per year.

These exercises may be conducted by telephone, or email (using ECM's Form 08). At least once a year this exercise is to be conducted by telephone, as this is the only accepted method of contacting the QI to report an actual incident.


**Note:** Upon completion of the notification either by email or telephone you should record the time and date in your official log. ECM will automatically email a confirmation of receipt of an electronic QI notification exercise within 24 hours of your receipt of same. If you make a QI Notification by telephone, there is no need to follow-up via email. If you make a notification by email, there is no need to follow-up via phone.

Version 1-2023

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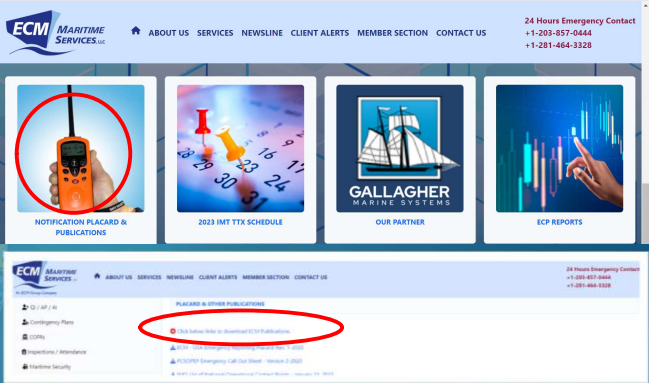
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## ECM EMERGENCY PLACARD DOWNLOAD

- Go to [www.ecmmaritime.com](http://www.ecmmaritime.com)
- Click on Notification Placard and Publications
- Download the latest placards
  - USA Emergency Reporting Placard
  - PCSOPEP Emergency Call-Out Sheet
  - IMO List of National Operational Contact Points



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# CALIFORNIA UPDATE

Note: Refer to ECM GD-04

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## CALIFORNIA UNANNOUNCED NOTIFICATION EXERCISE

- California Inspectors may conduct unannounced exercises
- California Inspectors may provide the master with a pollution scenario to test the master's knowledge of the notification procedures
- Masters should contact ECM immediately for assistance with this exercise
- Required notifications must be completed within 30 minutes
- ECM, once notified, will conduct the required notifications



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## CALIFORNIA NEW SMT REGULATIONS

- ECM received interim SMT certification from OSPR in June 2022
- Following the merger between ECM and Gallagher Marine Systems (GMS) on June 30, 2023, ECM and GMS have combined their SMTs under GMS' coverage and certification, including exercise credits
- Under the new arrangement, California exercise accreditation letters will be maintained in-house and can be provided on request. **They will not be distributed to California plan holders, as there is no regulatory requirement to do so.**





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## CALIFORNIA RESPONSE PLAN REQUIREMENTS

- Tank and non-tank vessels must have an approved California Contingency Plan
  - Must apply at least five (5) working days prior to entering California
- Tank and non-tank vessels must have a valid California COFR
  - Must apply at least ten (10) calendar days prior entering California




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## CALIFORNIA COFR REQUIREMENTS

- California COFRs are valid for two (2) years
- California COFR applicants are required to submit each vessel's renewed P&I Certificate of Entry/proof of pollution insurance each year to maintain validity
- Failure to do so will result in your COFR(s) being revoked

CALIFORNIA CERTIFICATE OF FINANCIAL RESPONSIBILITY (CA COFR) 

**OWNER OR OPERATOR:**  
FALCON SHIP MANAGEMENT  
 meets the financial responsibility requirements set forth in the Government Code Sections 8670.37.51 and 8670.37.58 as it applies to the operation of

**VESSEL NAME:** PACIFIC EMPRESS **IMO #:** 9265600  
**CERTIFICATE #:** 1-0356-001-001 **CNTRL #:** 11051  
**ISSUE DATE:** November 08, 2021


This certificate is valid for one year from the date of issue. This certificate is valid for a second year from the date of issue only if the insurance is current. You may verify updated insurance and check validity of certificate at the following link:  
<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=76424>


The holder of this document named above is subject to the provisions of California Code of Regulations, Title 14, Sections 791-797, implementing the financial responsibility requirements set forth in the Lemport-Keene-Seastrand Oil Spill Prevention and Response Act (Act), see California Code Sections 8670.37.51 through 8670.37.58. For the purpose of determining liability pursuant to the Act, this certificate of financial responsibility is conclusive evidence that the person or entity holding the certificate is the party responsible for the specific vessel.

If the applicant or the vessel name is changed a new certificate will be necessary. In addition, if the holder of the certificate ceases to be the owner or operator of the vessel, the holder must notify OSPR immediately.

It is the owner or operator's responsibility to ensure that this certificate number is also included in the owner or operator's marine oil spill contingency plan, which must be submitted to this office for approval, before the vessel can operate in California waters.


If you have any questions, please contact  
 Yasmine N. Ali  
[916.375.5914](tel:916.375.5914)

Sincerely,  
  
 Yasmine N. Ali  
 Financial Analyst  
 Office of Spill Prevention and Response  
[caofr-task@wildlife.ca.gov](mailto:caofr-task@wildlife.ca.gov)



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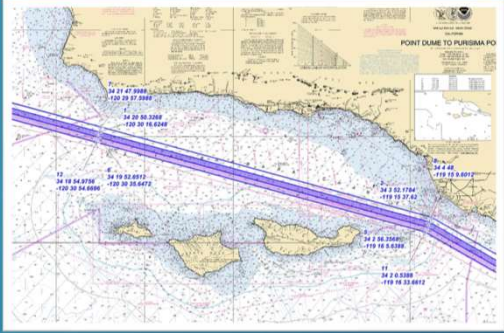
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## SOUTHBOUND SANTA BARBARA CHANNEL TRANSITS AND PORT HUENEME CALLS

- Southbound Santa Barbara Channel
- NRC (fees apply) requires 24-hour notification
- MSRC (no charge) does not require notification
- Port Hueneme
- NRC & MSRC provide Port Hueneme coverage (fees apply)
- Both NRC & MSRC require notification 24 hours in advance

**\*Please ensure your vessel Masters are only contacting their contracted OSRO**



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## CALIFORNIA BIOFOULING REGULATIONS\*

**From January 1, 2018:**

- Biofouling Management Plan required. Must include:
  - -anti-fouling coatings
  - -dry dock schedule
  - -vessel operating speeds
  - -intended operations
  - -anti-fouling coating dry thickness
  - -effective lifespan
- Must maintain a Biofouling Record Book

**\* ECM's Biofouling Management Plans and Appendix comply with MEPC 207(62) and CA regulations**

Biofouling and Sediment Management Plan Appendix to Ballast Water Management Plan

Record of Biofouling Management Actions  
**SAMPLE BIOFOULING RECORD BOOK PAGE \***


Name of Ship: \_\_\_\_\_ IMO Number: \_\_\_\_\_

Date	Item (number)	Record of Management Action	Signature of officers in charge

\*These pages may be used until the vessel receives an official Biofouling Record Book from flag or class

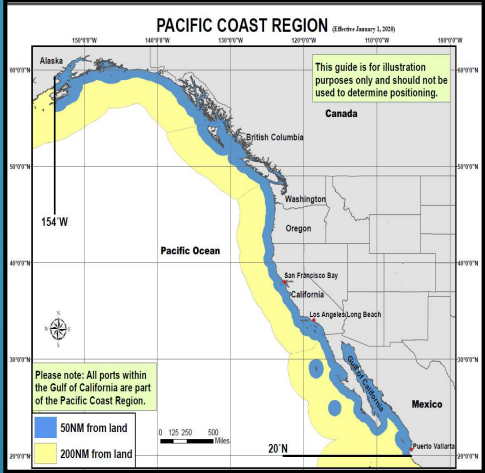
Prepared by: ECM Maritime Services

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## BALLAST WATER EXCHANGES – PACIFIC COAST REGION (PCR)

- Definition: All coastal waters (within 200 NM of land) on the Pacific Coast of North America, east of 154° W and north of 20° N, including the Gulf of California



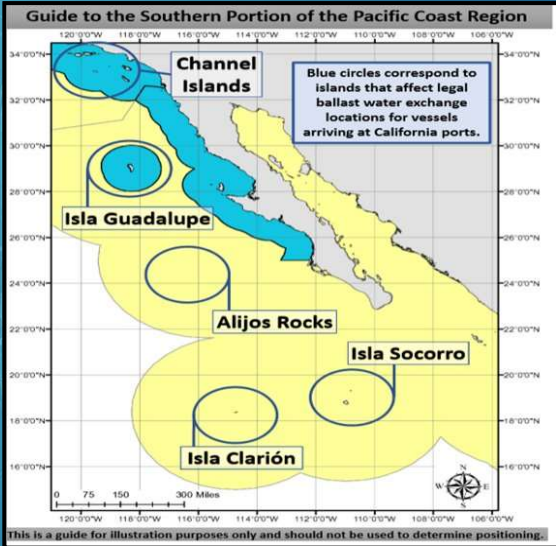
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## BALLAST WATER EXCHANGES – PACIFIC COAST REGION (PCR)

- ALWAYS measure distances from outermost island, rock formation, etc.



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## CALIFORNIA MARINE INVASIVE SPECIES PROGRAM (MISP)

- On January 1, 2022, the California State Lands Commission (CSLC) formally adopted the Federal (USCG) Ballast Water Discharge Standards contained in 33 CFR 151 Subparts C and D, as well as the 2013 Vessel General Permit (VGP).
- No new requirements, provided vessels already comply with existing US ballast water management regulations.
- CSLC inspectors may collect and analyze ballast water and sediment samples for research purposes and must be given access to ballast water tanks and sampling ports when feasible.

*Refer to ECM Client Alert 3-2022 for more information*


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### CA MARINE INVASIVE SPECIES PROGRAM (MISP) FEE

- Funds are used to prevent the spread of marine invasive species.
- Currently \$1,000 per voyage
  - Voyage is arrival to a California port from outside of California waters
- Can be paid by your agent if authorized.
- ECM can assist if the fee is not handled by your agent.
- Payment can be made online via the MISP Fee portal.



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### CALIFORNIA MARINE INVASIVE SPECIES PROGRAM – ANNUAL VESSEL REPORTING FORM (AVRF)

California's Marine Invasive Species Program Annual Vessel Reporting Form (AVRF) can only be submitted online, via SLC's web portal found at <https://misp.io/>. Email submissions are no longer permissible.

The process includes:


1. Registering on the website
2. Adding the vessel to your account
3. Creating an Annual Vessel Report
4. Answering 17 questions
5. Submitting the report

*Note: See Client Alert 21-2020*



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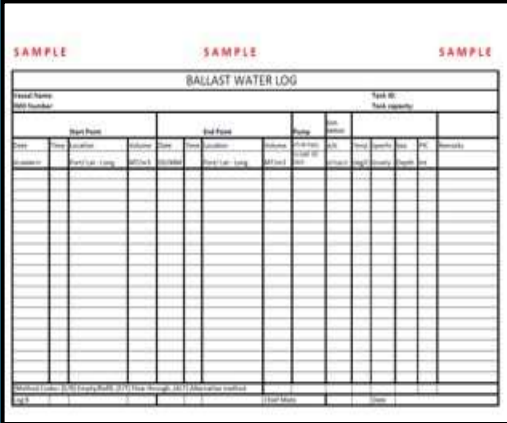
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### BALLAST WATER LOG REQUIREMENTS: CALIFORNIA, OREGON AND WASHINGTON

- These states require:
  - Ballast water log/record book showing ballast activities for each ballast water tank
  - The documentation be available onboard for inspection for two years
- Oregon and Washington also require logs/records document the exact time and position of the start and stop of ballast water operations for each tank.

*Note: See Client Alert 16-2019*



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## CALIFORNIA AIR RESOURCES BOARD (CARB) FUEL REGULATIONS




- CARB regulations remain in force until further notice
- CARB only permits the use of distillate fuel with a maximum sulfur content of 0.1% within Regulated California Waters (RCW)
- The RCW extends out to 24 miles from the coastal baseline, including islands, rocky outcrops, etc.
- Severe penalties are issued for non-compliance
- Vessels operating emission control technologies (Scrubbers) must hold a Research Exemption prior calling California. No new exemptions are being issued.
- Vessels using non-distillate fuels must notify CARB prior calling California

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## New At-Berth Regulation (2020)



On 01 January 2023, CARB's new 2020 At-Berth regulation took effect, in accordance with the following schedule:


Compliance Start Date	Vessel Type
January 1, 2023	Container and refrigerated cargo vessels
January 1, 2023	Cruise (passenger) vessels
January 1, 2025	Roll-on roll-off vessels
January 1, 2025	Tanker vessels that visit the Ports of Los Angeles or Long Beach
January 1, 2027	All remaining tanker vessels

- Container, Reefer and Cruise vessels calling at a California marine terminal are required to comply with emission control requirements using a CARB Approved Emission Control System (CAECS). The only pre-approved CAECS is shore power
- All vessels, regardless of type, are required to submit a report to CARB within 30 days of departing from a California marine terminal.
- Reporting can be via CARB's reporting template, ECM's Forms 16/16A, company-developed or third-party forms. There is no mandatory requirement to use CARB's template.
- Detailed explanations of the At-Berth regulation requirements can be found in ECM Client Alerts 1-2023, 5-2023 and 11-2023

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# WASHINGTON UPDATE

Note: Refer to ECM GD-03

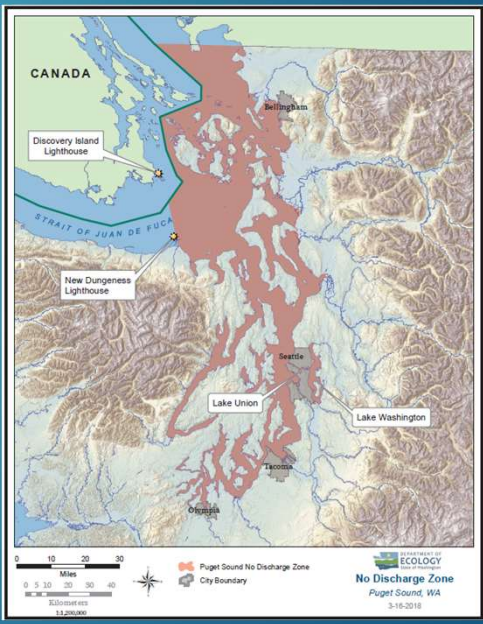
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## STATE OF WASHINGTON NO DISCHARGE ZONE (NDZ)

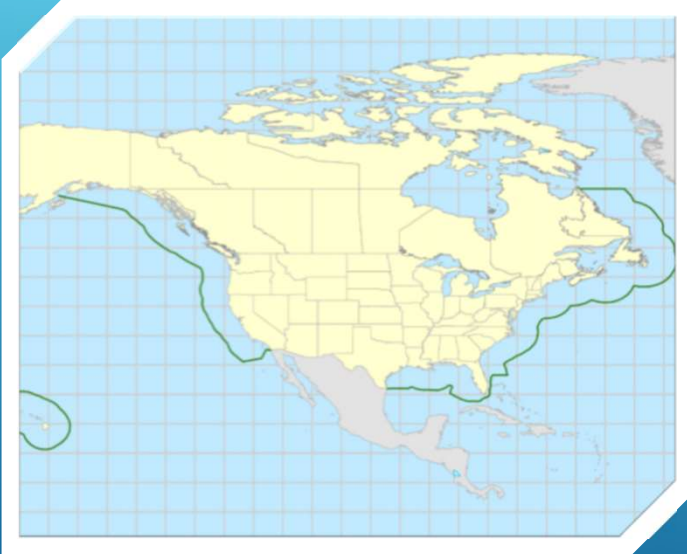
Effective May 10, 2018 Washington Department of Ecology (Ecology) enacted a new regulation that established a No Discharge Zone (NDZ) in the Puget Sound region.

- The NDZ prohibited the release of sewage only (black water) from all vessels, whether treated or untreated
- The NDZ covers all marine waters in the Puget Sound region north to the Canadian Border
- The designation of this NDZ had been challenged in court during 2020, as the availability of adequate shore reception facilities was in question. However, on March 1, 2021 the EPA determined that adequate facilities were "reasonably available."



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## EMISSION CONTROL AREAS (ECA)

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## EMISSION CONTROL AREA (ECA) SOX COMPLIANCE - EGCS (SCRUBBERS)

- EGCS (scrubbers) are permitted in all modes (open/closed loop and hybrid) within the US ECA except for:
  - **Connecticut:** All State waters (3 miles)
  - **California:** Regulated California Waters (24 miles)
  - **Florida:** Ports of Cape Canaveral and Port Everglades
- Vessels using EGCS must ensure that details have been uploaded by the flag administration to the IMO GISIS database before entering the ECA.
- Once open-loop EGCS is used in VGP waters (3 miles), vessels must follow annual VGP sampling and analysis protocols (see ECM Client Alert 17-2022).



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## EMISSION CONTROL AREA (ECA) NO<sub>x</sub> COMPLIANCE – TIER III ENGINES

- Marine Diesel Engines installed on vessels constructed on or after 01 January 2016 must be Tier III compliant to trade in the ECA.
- SCR and EGR, if fitted, to be fully functional while in the ECA. Malfunctions to be reported to the relevant USCG Captain of the Port (COTP) asap. Shortage of Urea is not an acceptable reason for system malfunction.
- EGR bleed-off water to be handled in accordance with MEPC.307(73).
- The US is a signatory to Marpol Annex VI. Tier III engines to comply with 2008 NO<sub>x</sub> Technical Code.

Refer to ECM Client Alert 12-2023 and Canada SSB 05/2023

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## USCG Requirement – Updates to Pilot Cards aboard vessels with EPL

For vessels with Engine Power Limiters (EPL) or governors, the USCG has notified stakeholders that **vessel Pilot Cards must be updated to indicate maximum available power as allowed by the EPL or governor installed.**

**An EPL is an overridable system that limits the engine's power output, while a governor is a fixed (non-overridable) system that permanently changes the power output characteristics of the vessel.**

Refer to ECM Client Alert 18-2023

The USCG stance is that vessels should not be required to circumvent emissions control equipment or override EPLs as a basis for entering or exiting a U.S. waterway. The use of power reserve for EPL equipped vessels is only allowed for the purpose of securing the safety of the ship or saving life at sea.

September 28, 2023: **COTP New Orleans** released new Marine Safety Information Bulletin (MSIB) with requirements for Pilot exchange and overriding EPL in the Lower Mississippi River.  
Refer to ECM Client Alert 20-2023



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## Houston Pilots – New Development


On September 1, 2023 Houston Pilots issued a letter to stakeholders, describing their requirements for EPL-equipped vessels



A. Maneuvering RPM and speeds to be posted in Wheelhouse and provided to the Pilot.  
Vessels unable to attain posted RPM may be restricted to daylight transit and/or additional Pilot/Tug requirements

B. Any load limiting or automatic acceleration limiting devices/software that could limit engine response must be capable of being overridden immediately by the Master or OOW in an emergency.

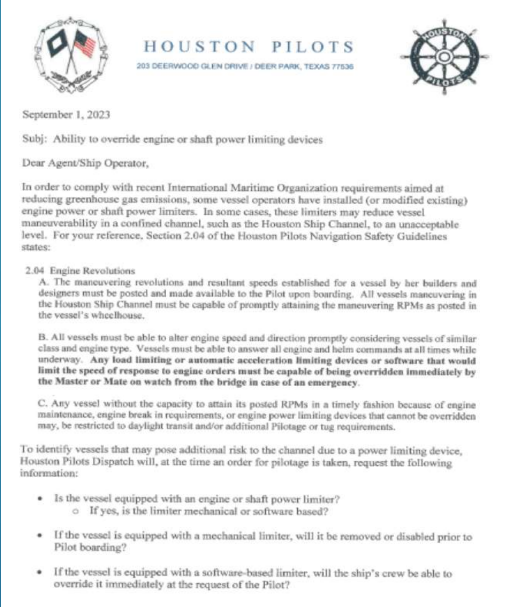
37



## Houston Pilots – New Development (Contd.)


New Questionnaire for arriving vessels (relayed through local agents) :

1. Is the vessel equipped with an engine or shaft power limiter?
  - a. If yes, is the limiter mechanical or software based?
2. If the vessel is equipped with a mechanical limiter, will it be removed or disabled prior to Pilot boarding?
3. If the vessel is equipped with a software-based limiter, will the ship's crew be able to override it immediately at the request of the Pilot?
4. How long will it take to disable/remove the EPL?



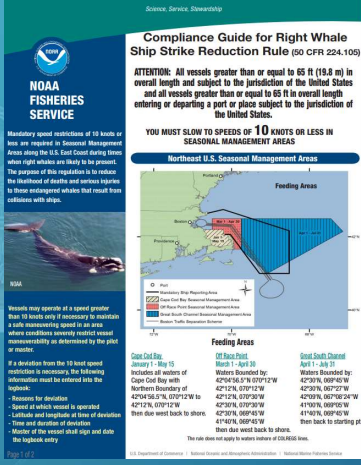

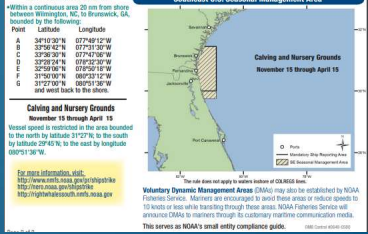
The image shows a scanned document from Houston Pilots dated September 1, 2023. The subject is 'Ability to override engine or shaft power limiting devices'. It addresses vessel operators regarding engine or shaft power limiters. The document includes a questionnaire with four main questions and sub-questions, matching the text on slide 37. It also references Section 2.04 of the Houston Pilots Navigation Safety Guidelines, which details requirements for engine revolutions and the ability to override power limiters in an emergency.

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# Right Whale Ship Strike Reduction – NOAA Compliance Guide

- NOAA Guide available online or on request from ECM
- Establishes Northeast, Mid-Atlantic and Southeast Seasonal Management Areas (SMAs)
- Reminder issued in Winter 2022 Newline
- Information also broadcast via NAV WARNINGS and VHF
- NOAA local offices have begun issuing letters of warning to offenders

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# CANADA UPDATE



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## CANADA BALLAST WATER REGULATIONS UPDATE

- Canada revised their Ballast Water Regulations (SOR/2021-120) to include new requirements for BW management when proceeding to designated Canadian Fresh Waters for de-ballasting. Requirements include ballast water exchanges plus treatment for vessels fitted with BWTS.
- Designated Fresh Waters are listed in Canadian Notice TP 13617, along with Alternate Ballast Water Exchange Areas. See ECM Client Alert 9-2021
- All vessels must comply with Ship Safety Bulletin 07/2022, which contains updated information to vessels for submitting the Canadian Ballast Water Reporting Form (BWRF) to Transport Canada Marine Safety and Security (TCMSS), using only the latest version of the BWRF. See ECM Client Alert 5-2022



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## Canada – Scrubber (EGCS) Wash Water Discharge

- Port authorities in Canada are independently studying the effects of wash water from open-loop EGCS and taking decisions on allowing or prohibiting such wash water discharges
- As of June 2023, the following ports have prohibited the discharge of EGCS wash water within port limits (anchorage and berths):
  - a) Sept Iles, Quebec
  - b) Vancouver, British Columbia



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## Canada – Protecting the North Atlantic Right Whale

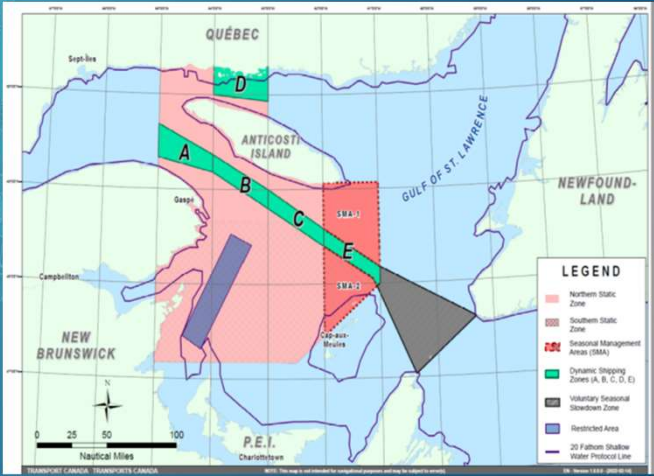
### Speed Restrictions in the Gulf of St. Lawrence

**Established Zones:**

- Static Zones
- Dynamic Shipping Zones
- Seasonal Management Areas
- Voluntary Seasonal Slowdown Zone
- Restricted Area

**Restrictions in effect from April 19 to November 15, 2023**

Refer to ECM Client Alert 12-2023 and Canada SSB 05/2023



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## Canada – Protecting Resident Killer Whales in S. British Columbia

- 400 M minimum approach distance
- Ban against positioning vessel in path of Killer Whale
- Interim Sanctuary Zones
- Speed Restricted Zones
- NAVWARN Broadcasts
- Reporting and enquiries

**Potential fines of up to \$1,000,000**

Refer to ECM Client Alert 16-2023 and Canada SSB 13/2023



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**OFFICE OF COMMERCIAL VESSEL COMPLIANCE**  
DOUGLAS A. MUNRO BUILDING  
USCG HQ


## USCG ANNUAL PSC ROUND UP 2022

### Areas of Focus

- PSC Statistics
- GHG
- VIDA
- Cyber Safety & Security




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### USCG PORT STATE CONTROL 2022 STATISTICS



- 11,200+ individual vessels making US port calls, representing 78 Flag States
- Over 82,200 port calls (up from 74,000 in 2021)
- Over 8,700 PSC exams conducted (2021 had 8,663 exams and 2020 had 7,383)
- Total of 78 vessels detained (up from 63 in 2021. There were 57 detentions in 2020)




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## Historical Trends



	2019	2020	2021	2022
Distinct Arrivals (Unique Vessel Arrivals)	10,394	10,507	10,945	11,235
3-Year Average Detention Ratio	1.07%	1.02%	0.87%	0.80%
PSC Detentions	95	57	63	78
PSC Examinations	8,622	7,383	8,663	8,706
ISPS Major Control Actions	7	-	-	-
ISPS Examinations	8,619	-	-	-
3-Year Average Major Control Action Ratio	0.08%	-	-	-

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### USCG PORT STATE CONTROL 2022 STATISTICS

**2022 Detention Ratio: 0.89%**  
 2021 Detention Ratio: 0.73%

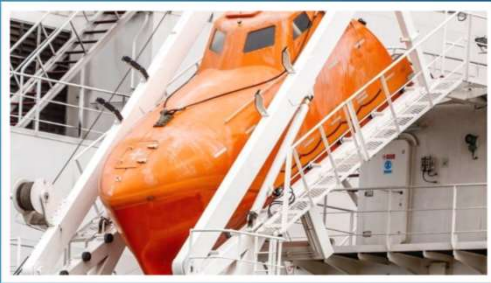

This remains relatively low, when compared with other PSC regimes

**Detentions**  
 Top three detention categories in 2021:

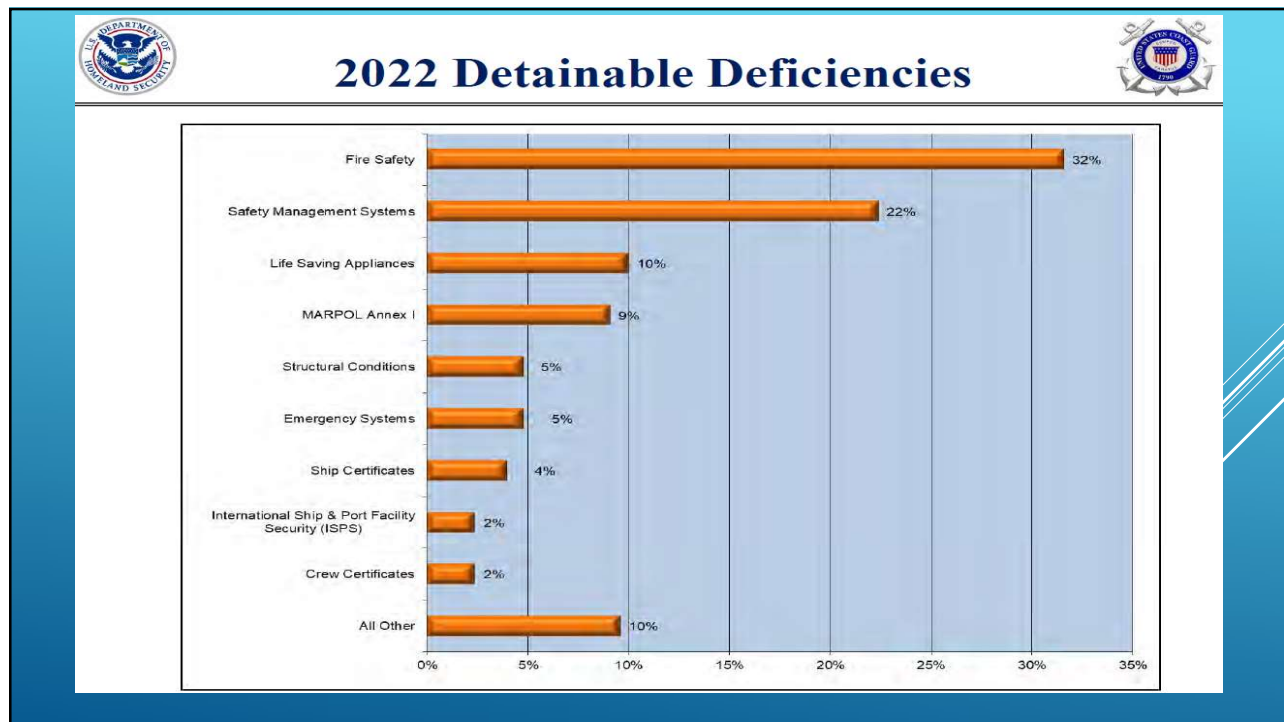
1. Fire Fighting Appliances/Fire Safety
2. Safety Management Systems
3. Lifesaving Appliances

Consistent trend of SMS related deficiencies over the last several years

COMDT (CG-CVC-2) reviews & validates or non-validates every PSC detention. Appeal process in place

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**Port State Control Appeals**

- Detentions reported immediately to IMO; vacated if granted
- Appeals are part of system (46 CFR 1.03)
  - Any directly affected party (vessel master, owner, operator, charterer, agent, classification society, etc) can dispute CG issued detention
  - No repercussions to appeal!
- **Detention Appeals for 2022**
  - 23 appeals were submitted to the Coast Guard
  - 9 challenging the overall merit of the detention
    - 2 were granted, 7 were denied
  - 14 contesting the party associated with the detentions
  - 8 granted, and 5 were denied, 1 still under consideration


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## QUALSHIP 21 & E-ZERO




- The QUALSHIP 21 program ended calendar year 2022 with an enrollment of **4,431** ships. This marks a **21%** increase over last year's enrollment.
- The E-Zero program ended calendar year 2022 with **306** ships enrolled. This marks a **39% increase** over last year's enrollment.



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## QUALSHIP 21 & E-ZERO



For a Flag Administration to qualify they must:

- Have a 3-year detention ratio less than 1.00%
- Be credited with a minimum of 10 PSC exams per year for the last 3 years
- Submit a copy of their Self-Assessment of Flag State Performance to the IMO
- Submit their executive summary from their Member State Audit Scheme




**Flag States that are preliminarily eligible for QUALSHIP 21 in 2023-2024**


Barbados	Greece	Marshall Islands	Republic of Korea
Belgium*	Hong Kong	Netherlands	Saudi Arabia
Bermuda	Jamaica	Norway	Singapore
Cayman Islands	Japan	Panama*	United Kingdom
China	Liberia	Philippines	Vanuatu*
Denmark	Malta	Portugal*	

New to the list this year

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## Targeted Flag Administrations - Safety




High Risk	Medium Risk
Bolivia	Antigua and Barbuda
Curacao	
Italy	Canada
Latvia	
Saint Vincent and the Grenadines	Isle of Man
Togo	
Turkey	


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## GHGs and Decarbonization



- **IMO GHG strategy**
  - 2023 Strategy considering increasing levels of ambition from 2018 Initial strategy
  - US position going forward
- **2023 Annex VI Requirements**
  - Energy Efficiency for Existing Ships (EEXI)
  - Carbon Intensity Indicator (CII)
- **Alternate Fuels**
  - Multiple fuel considerations
  - CG supporting IMO Guideline development
    - Fuel Cells, Methanol, Hydrogen, Ammonia
  - CG leverage equivalency authority to support industry innovation



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## U.S. BALLAST WATER MANAGEMENT UPDATE

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### COMPLIANCE OPTION WITH U.S. BALLAST WATER MANAGEMENT REGULATIONS

- The Ballast Water Management Final Rule has several options to meet the discharge standard
- A vessel does **NOT** need to install a ballast water treatment system (BWTS) if no ballast discharges occur in US territorial waters (12-mile limit)

*Note: Refer to NVIC 1-18 for a full overview*



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## Options for Compliance




**1. No BW Discharge** 

**2. Coast Guard Approved Ballast Water Management System** 

**3. Discharge to Facility Onshore or to Another Vessel for Purpose of Treatment** 

**4. Use only water from a U.S. Public Water System** 

**Two Temporary Compliance Alternatives**

↓

**1. Alternate Management System (AMS) – Temporary Designation for up to 5 years**




**2. Receive an Extension to Vessel's Compliance Date - extension period will vary depending upon TA system availability**



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## THE ALL-IMPORTANT COMPLIANCE DATES


33 CFR 151.2035(b)  
Implementation Schedule for Approved Ballast Management Methods

	Vessel's Ballast Water capacity	Date Constructed (Keel laid or eqv)	Vessel Compliance Date
New vessels	All	On or after December 1, 2013	On delivery
Existing vessels	Less than 1500 m <sup>3</sup>	Before December 1, 2013	First scheduled drydocking after January 1, 2016
	1500-5000 m <sup>3</sup>	Before December 1, 2013	First scheduled drydocking after January 1, 2014
	Greater than 5000 m <sup>3</sup>	Before December 1, 2013	First scheduled drydocking after January 1, 2016

*Note: Purely recreational vessels are exempt.*

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## TYPE OF APPROVAL STATUS OF BALLAST WATER TREATMENT SYSTEMS (BWTS)

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- There are currently 50 BWTS models (or model ranges) with full USCG type approval.
- Since 2012, over 60 BWTS have received AMS notation from USCG
- Vessels fitting BWTS must source a type approved unit. AMS units are not permitted unless no type approved unit is available!





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## USCG Type Approved BWTS Units Certification and Markings

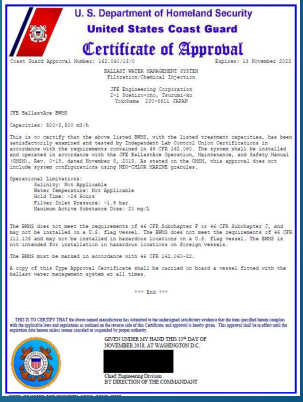
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### USCG PSC inspectors are becoming more focused on verifying proof of BWTS type approval aboard vessels

Vessels trading to the US and fitted with a BWTS that is type-approved by the USCG (which is necessary for it to be used in US waters), should carry a copy of the USCG type approval certificate on board.

In addition, the BWTS should have a nameplate attached to the system with the following information, required under 46 CFR 162.060-22:


- (1) Coast Guard approval number assigned to the BWTS in the certificate of approval
- (2) Name of the manufacturer
- (3) Name and model number of the BWTS
- (4) The manufacturer's serial number for the BWTS
- (5) The month and year of manufacture completion
- (6) The maximum allowable working pressure for the BWTS



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## VESSELS BOUND FOR U.S. WATERS WITH INOPERABLE BWTS

- USCG CVC Policy Letter 18-02 issued in February 2018, to provide comprehensive guidance to vessels and USCG COTPs in such situations (Refer to ECM Client Alert 05-2018)
- It references 33 CFR 151.2040, on procedures for “Discharge of Ballast Water in Extraordinary Circumstances”
- Vessels must always maintain BWTS in operational readiness and test the equipment before any voyage involving a US port call
- Report inoperative BWTS asap to the relevant Captain of the Port (COTP), with details of planned remedial action



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## VESSELS BOUND FOR U.S. WATERS WITH INOPERABLE BWTS (CONTINUED)

- Conduct an open-sea exchange en-route to the US port
- Follow COTP instructions regarding alternative methods of BW management (Do not discharge any ballast in US territorial waters without clearance from the COTP)
- Same procedure to be followed if BWTS fails inside US waters
- BWMP must contain guidance on above situation
- Instructions from different COTPs can vary considerably

Some COTPs are becoming increasingly strict and intolerant about permitting untreated BW discharges!



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## BALLAST WATER MANAGEMENT REPORT

- All vessels proceeding to US ports must submit a BWMR using the current form, to the National Ballast Information Clearinghouse (NBIC). **A new Ballast Water Management Reporting Form (OMB number 1625-0069, expiration date 31 July 2023) has been issued and must be used by all vessels. Earlier versions are obsolete. Refer to ECM Client Alert 15-2020**
- The form can be sent through the NBIC website or via email attachment and should be submitted **no later than 6 hours after arrival port**
- Vessels not planning to de-ballast must also submit the form, with the Ballast Water History section left blank
- A pdf copy of the form is to be emailed **24 hours prior arrival** to State authorities when calling at ports in California, Oregon and Washington

*Note : Fill every section out accurately – a copy of your report gets forwarded to the relevant Coast Guard COTP!*

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## USCG ENFORCEMENT

- Coast Guard inspectors are actively verifying compliance with US regulations
- Vessels found to be discharging ballast in violation of these requirements can be penalized, detained, or both.
- Financial penalties currently average \$5,000 per violation and have been issued for up to \$38,175 under the National Invasive Species Act (NISA)

*Note : No vessel has been detained by PSC for a ballast water management violation thus far.*



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## VESSEL GENERAL PERMIT (VGP) AND VIDA

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### VGP COMPLIANCE – GREAT LAKES

#### Applicability

- VGP applies **throughout the Great Lakes in U.S. waters.**
- Jurisdiction is **not limited to just 3 NM.**

#### State Waters

- State restrictions on discharges also apply in U.S. waters beyond 3 NM from shore.
- Illinois, New York, Ohio, Michigan, Minnesota, and Wisconsin all have VGP discharge restrictions.



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## ANALYTICAL MONITORING UNDER VGP (CURRENT REQUIREMENT)



**Ballast water**

- If discharged into VGP waters through a BWTS
- Sampled during the 12-month period after first such VGP water discharge
- Analysis required on two separate occasions, at least 14 days apart
- **Biological monitoring:** If both results within parameters, only one analysis required per 12 months thereafter
- **Residual Biocide monitoring:** Twice per 12 months, no exceptions

**Increased monitoring by EPA via Annual Reports.  
Companies have been penalized for non-compliance**

**Graywater**

- New build vessels with a maximum crew capacity of 15 or more
- Analyzed twice per year after first VGP water discharge
- Sampling must be at least 14 days apart

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## ANALYTICAL MONITORING UNDER VGP (CURRENT REQUIREMENT) (CONTINUED)


**Exhaust Gas Scrubber (EGS) wastewater:**

- Vessels with an NOI and using EGS in VGP waters must analyze wastewater samples twice per year
- The two sampling events must be at least 14 days apart
- If analysis results are within specified parameters during the first year, only one sampling and analysis is required during each subsequent year



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## ANALYTICAL MONITORING OF BALLAST WATER

The EPA is imposing heavy penalties for non-compliance. Are you familiar with the reporting process?

Question A: Ballast Water Treatment System Addendum										Question B: Ballast Water Treatment System Addendum						
* Vessel Name	* Ballast Treatment System Description	* System Supplier	* System Model	* Installation Date	* First Date of Operation	* Type Approved? (if Y, go to)	* All Type Approval Data Available to USEPA/USCG?	* System determined by USCG to be an Alternate Management System?	* All applicable BWTS monitoring completed during calendar year?	* Monthly Functionality Monitoring Completed?	* Calibration Completed at Least Annually?	* All Biological Monitoring Completed?	* Number of Biological Monitoring Sampling Events?	* Residual Biocides/Derivative Monitoring Completed?	* Number of Initial Res. BioDeriv Mon. Events	* Number of Maint. Res. BioDeriv Mon.
text A(1) - A(500)	text A(500)	text A(1) - A(500)	text A(1) - A(500)	date [MM/DD/YYYY]	date [MM/DD/YYYY]	drop down	drop down	drop down	drop down	drop down	drop down	drop down	number N(1) - N(3)	drop down	number N(1) - N(3)	number N(1) - N(3)

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## NEW DEVELOPMENT – SHIPBOARD VGP INSPECTIONS BY JOINT EPA-USCG TEAMS

- Recent reports indicate that EPA is assigning their own inspectors to vessels, primarily at ports in California
- Joint EPA and USCG teams board and verify compliance with 2013 VGP requirements
- NOI closely scrutinized
- Emphasis on review of (a) Wastewater Sources, (b) Wastewater Treatment and (c) Compliance History of Annual Report submission





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## VGP MAINTENANCE FOR 2023


- Annual Report for 2023 to be submitted to EPA by February 28, 2024. All analytical and functional monitoring requires Discharge Monitoring Reports (DMR)s. Increased monitoring by USCG and EPA. Companies have been penalized for non-compliance
- Notice of Intent (NOI) maintenance – Change of company name, vessel particulars (e.g. name, address, flag, call sign, etc.) requires NOI alterations but last drydocking date does not need to be updated
- Notice of Termination (NOT) to be filed if any vessel holding an NOI is scrapped, sold or transferred
- Drydock Report required if vessel drydocks in 2023




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## VIDA Update



### Vessel Incidental Discharge Act (VIDA)



- Enacted on December 4, 2018
- The existing 2013 VGP and USCG Ballast water regulations remain in effect
- Requires the development of two federal rules
  - National Discharge Standards (EPA)
  - Corresponding Vessel Regulations (USCG)
- Preempts state requirements



**December 2018**  
VIDA Promulgated

**January 2023**  
EPA Announcement of Intent for Supplemental

**October 2020**  
USCG Concurrence with EPA's NPRM Published

**Fall 2024**  
EPA Final Rule Anticipated

**Fall 2026**  
CG publishes Final Rule (2 years after EPA)



## VIDA - Recent Developments

Under the Biden Administration, the EPA is developing a “Supplemental Notice” to the 2020 NPRM. The EPA anticipates that the “Supplemental Notice will:

- Provide clarification on the original proposed rule
- Share new ballast water data that EPA is receiving from the USCG and
- Discuss additional regulatory options EPA is considering for the final rule

The Supplemental Notice was submitted to the Office of Management and Budget (OMB) for review on 29 July 2023. The EPA regulatory agenda indicates that the Supplemental Notice will be issued in September and will be available for public comment.

As things stand, the implementation schedule anticipated by the EPA and USCG (previous slide) remains unchanged, unless the Supplemental Notice contains fundamental changes.



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## CYBER SAFETY AND SECURITY

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## Cyber Safety and Security



- CG Cyber Strategic Outlook
  - LOE 1: Defend and Operate the Enterprise Mission Platform
  - LOE 2: Protect the MTS
  - LOE 3: Operate in and through Cyberspace (Line of Effort)
- IACS UR E26 and E27 (new ships after 1 Jan 2024)
  - E26: Ship cyber resilience requirements from design to operation
  - E27: Shipboard equipment cyber resilience requirements (includes focus on 3<sup>rd</sup> party equipment supplies prior to ship installation)
- CISA Cyber Performance Goals (Oct 2022)
  - Baseline cybersecurity best practices for US critical infrastructure
  - Combines IT and OT recommended measures
  - Reduce aggregate risk to nation and individual entities
- Cyber Security NPRM – CG rulemaking effort to address cyber security in MTS.





IACS adopts new requirements on cyber safety - IACS



Cross-Sector Cybersecurity Performance Goals | CISA

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## The USCG has a Gigantic Task on its Hands

CYBER ENVIRONMENT CHANGES SINCE 2015 STRATEGY



**39 seconds**  
*Every 39 seconds a hacker attacks, on average 2,244 times per day.*



**\$3.86 million**  
*was the average cost of a data breach in 2020.*



**36 billion**  
*records were exposed by data breaches in the first half of 2020.*



**207 days**  
*is the average time it took to identify a breach in 2020.*



**280 days**  
*was the average lifecycle of a breach.*



**\$10.5 trillion**  
*the amount that damage related to cyber crime is projected to hit annually by 2025.*

THE MARINE TRANSPORTATION SYSTEM


**25,000 miles** of coastal and inland waterways, serving **361 ports**, **124 shipyards**, over **3,500 maritime facilities**, **20,000 bridges**, **50,000 Federal aids to navigation**, and **95,000 miles** of shoreline that interconnect with critical highways, railways, airports, and pipelines, and undersea cables carrying **99% of U.S. communications** abroad.



**\$5.4 trillion**  
*Approximately \$5.4 trillion flows through the MTS, constituting about 25% of the United States'*



**90%**  
*of U.S. imports enter and exports exit by ship.*



**500+**  
*major operational technology cyber-attacks occurred in the marine industry in 2020.*

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# THANK YOU!

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