



Salvage and Marine Firefighting Tabletop & Equipment Deployment Exercises FOR YEAR 2019

Fulfillment of PREP Guideline Sections 3.11, 3.12, & 3.15.

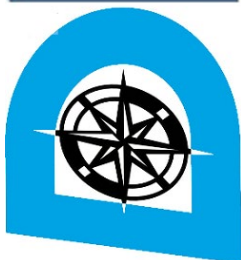
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SALVAGE



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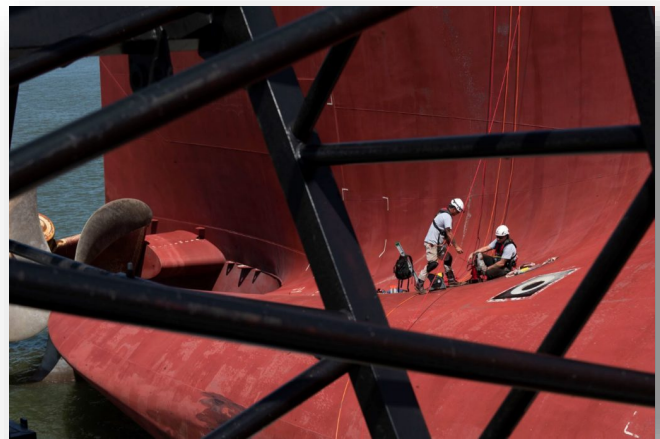
To Our Clients

Managing Marine Emergencies in the United States

From ringing the New Year to the very last day of 2019, Donjon-SMIT was serving you, our clients, with emergency response services in all regions of the United States.

We are extremely proud of our achievements this year, which would not be possible without the dedication of the parent companies of Donjon-SMIT, LLC an OPA-90 Alliance, our employees, and response partners. This dedication and commitment have not only enabled us to meet the requirements of the Salvage and Marine Firefighting regulations under the Oil Pollution Act of 1990, but to exceed them. The necessity of rapid deployment of assets and expert personnel was very aptly demonstrated this year.

In early September on a very early Sunday morning a car carrier carrying thousands of vessels capsized after leaving the port of Brunswick. Donjon-SMIT was on scene within two hours, and the U.S. Coast Guard rescued 20 of the crew before fire forced rescue teams back with four crew members still unaccounted for. With the four crew members assumed to be trapped in the vessel, the USCG requested that Donjon-SMIT conduct the search and rescue operations aboard the vessel. On Monday, Donjon-SMIT's team managed to make contact



with the four men still trapped and drilled into the hull to free them. Three of the men were freed on Monday afternoon, before the last man was safely extracted several hours later. It certainly was a proud day for us, and proof of the effectiveness of the Vessel Response Plan program.

In other news, our Tim Williamson, General Manager of Donjon-SMIT, was elected president of the American Salvage Association (ASA). Tim looks forward to leading the ASA and in doing so, help to improve marine casualty response in North American coastal and inland waters.

As the leader in salvage response operations in the U.S. and around the world, we look forward to serving you in 2020 and beyond. Please contact us anytime to assist with any situation that might arise in the new year.

Combined Salvage and Marine Firefighting Management Team Tabletop Exercise

What is the focus of the SMFF TTX and who is expected to participate?

The Salvage Management Team & Marine Firefighting Management Team

As stated in the PREP Frequently Asked Questions (FAQ's) published by the USCG:

“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.”

PREP allows service providers to utilize actual responses for exercise credit. Donjon-SMIT has taken credit for actual responses conducted this year to extend SMFF TTX credit to our clients (plan holders).

We invite Donjon-SMIT clients to participate in the tabletop exercises through comments to this documentation. Additionally, Donjon-SMIT personnel are available to participate directly in your TTX in conjunction with your incident management team tabletop exercises. Please see pricing details in the relevant section.

Applicability, Frequency, and Initiating Authority

- Shore-based Salvage Tabletop Exercise (Salvage TTX): Tank vessels and NTVs carrying oil as cargo or fuel.
- Shore-based Marine Firefighting Exercise (MFF TTX): Tank vessels and NTVs carrying oil as cargo or fuel. (Not required for NTVs with an oil capacity of less than 250 barrels.)
- One shore-based Salvage TTX per year, and one MFF TTX per year.
- The TTX is initiated by company policy, or via an actual response through Vessel Response Plan (VRP) Activation.

Actual Responses through VRP Activation

At various dates and times, in various Captain of the Port Zones and operating areas throughout 2019, Donjon-SMIT was engaged in twenty-four incidents through Vessel Response Plan activation. The Vessel Response Plan (VRP), as required under the Oil Pollution Act of 1990 (OPA-90), is activated when there is an incident or circumstance that presents a threat of pollution. Each case Donjon-SMIT was engaged in this year was unique in nature and type / scope of services required. As with all VRP activations of Salvage and Marine Firefighting services, the process begins with a Remote Assessment and Consultation between Owner(s)/Vessel(s) and Donjon-SMIT. In some cases, nothing further is required.

Combined Salvage and Marine Firefighting Management Team Tabletop Exercise

Donjon-SMIT, the contracted Salvage and Marine Firefighting (SMFF) provider was notified by owners or their Qualified Individuals in the below documented cases and quickly responded, dispatching local and cascade salvage team personnel and equipment as appropriate. In all the cases, quick activation of the VRP lessened the likelihood of situations escalating and deteriorating, which ultimately saved clients and their underwriters the considerable costs attendant to environmental restoration efforts. Donjon-SMIT protects both shipowner and environmental interests and sets the industry standard for OPA-90 response services to the maritime community.

Participating Elements

*Salvage Management Team and MFF Management Team as established in the response plan.
Participating personnel from Donjon-SMIT, SMIT, and/or Donjon:*

S. Tervoort	M. Lozano
R. Fredricks	D. Martin
S. Boudreaux	S. Newes
M. Haldenwang	J. Sluijmers
P. Hankins	T. Williamson
B. Kratz Jr.	J. Witte
G. Lorensen	L. McOwen
O. Lopez	M. Hardin
K. Edgar	J. Martina
S. Wijnbergen	C. Bos
A. Hoonard	V. Delmaestro
B. Yandoli	



Combined Salvage and Marine Firefighting Management Team Tabletop Exercise

Objectives

Exercise the Salvage and MFF Management Team's organization, communication, and decision making in managing a salvage response as established in PREP Guidelines 3.11 & 3.12.

- See section "Checklist: Salvage Management Team Tabletop Exercise Objectives Tested"
- See section "Checklist: Marine Firefighting Management Team TTX Objectives Tested"

Exercise Completion Items & Results

The Salvage and Marine Firefighting Management Team Tabletop Exercise was conducted with the following items completed. Results are as documented. *(Continued on next page.)*

Summary of Response Activities and Actions

Date(s) Performed:

January 2019 through December 2019

Exercise or Actual Response:

Actual responses and TTX

Initiation Time:

Various

If an exercise, announced or unannounced:

Not exercises, and all unannounced except for the attended TTX.

Completion Time:

Various

Location:

Captain of the Port Zones:

Response plan scenario used:

- ✓ Hull Damage
- ✓ Machinery Damage
- ✓ Stranding or Grounding
- ✓ Allision
- ✓ Sinking
- ✓ Collision
- ✓ Capsizing
- Stress Fractures
- ✓ Fire/Explosion

- Charleston
- Columbia River (Portland OR)
- Hampton Roads
- Honolulu
- Houston-Galveston
- Key West
- Miami
- Morgan City
- New Orleans
- New York
- San Juan (PR/USVI)
- Savannah
- Western Alaska (Anchorage)

Combined Salvage and Marine Firefighting Management Team Tabletop Exercise

A. Knowledge of the response plan and, when exercising the MFF team, the pre-fire plan;

The responses during 2019 in which Donjon-SMIT's Salvage and Marine Firefighting Management Team was activated included all 19 services identified in the regulations and nearly all U.S. Coast Guard Districts. All Donjon-SMIT personnel involved with the responses had excellent comprehension of the contents of the VRP and their roles during the incidents. Donjon-SMIT was properly notified and appropriate SMFF assets were activated, deployed and managed by experienced SMFF personnel. Three cases in 2019 involved marine firefighting components:

1. A container ship fire,
2. An LNG vessel involved in a collision, and a
3. Grounding and subsequent capsizing of a car carrier.



Two incidents in 2019 involved lifesaving operations, which further underscore the necessity of rapid deployment of personnel and equipment. The capsized car carrier had four crew members unaccounted for after the vessel was abandoned, and the rest of the crew were rescued. Donjon-SMIT was tasked with locating and retrieving those possibly trapped inside. The missing crew members were located by Donjon-SMIT personnel tapping on the hull and listening for responses. Soon after a plan was developed to extract them from the hull that would not risk igniting a fire due to the engine room oil contaminants. Vessel plans on file for the VRP were utilized to plan the extraction, with all four souls safely rescued.

Donjon-SMIT went on to successfully complete the oil pumping of all accessible tanks from the vessel, including extinguishing fires that started in the cargo holds. The Donjon-SMIT team gained access to 26 fuel tanks, some of which were submerged and could only be reached by rappelling and conducting dive operations inside the wreck. Fuel was pumped from the tanks into a barge for proper disposal. The tanks were then washed with steam to remove residual fuel, which was collected and transferred into containers. More than 320,000 gallons of oil and water mixture were removed.

Other cases this year included the recovery of a sunken vessel in the Mississippi River, emergency towing operations, temporary repairs of a vessel involved in a collision where no hot work could be conducted, and two vessel encountering serious flooding issues. All these cases highlight the great importance of a quick and proactive response posture to not only mitigating any risk of pollution, but in safeguarding the ship and her cargo.

For plan holders not involved in these responses, knowledge of the response plan is exercised (and credit taken) by your participation in the IMT TTX as indicated under the previously noted objectives attachments.

Combined Salvage and Marine Firefighting Management Team Tabletop Exercise

B. Proper Notifications;

In all documented cases that occurred in 2019, owners gave notice to the U.S. Coast Guard, their Qualified Individual or to Donjon-SMIT directly, and activated their response plan and Salvage and MFF Management team, their contracted SMFF provider, Donjon-SMIT. Steps were then immediately taken by the Salvage and MFF Management team to begin initializing a response.

Another illustration of the importance of proper notifications and activation of the vessel response plan was demonstrated during a containership fire that occurred in the Atlantic Ocean. Though this was not a VRP response, it was SMIT lead with Donjon and Donjon-SMIT assisting, and shows there is little time to waste in these types of situations.

On January 6th, a containership was reported on fire off the East Coast of the U.S. Donjon Marine was contracted to provide a vessel to transport the equipment and firefighting personnel from New York to

the vessel. Donjon's oceangoing tugboat ATLANTIC ENTERPRISE, is one of the largest, heaviest salvage tugs on the East Coast of the U.S. The hope was that firefighting gear, both pumps and personal firefighting gear could be transported to the offshore location, and with the help of additional tugs headed to the scene, the fire could be successfully battled.

The ATLANTIC ENTERPRISE's primary dimensions are 150' x 40' with a working draft of 22 feet. Designed as an anchor handler, the 6500 HP has had an illustrious career performing a variety of salvage and towing jobs. Her sister ship, ATLANTIC SALVOR, was contracted by the U.S. Navy to tow an ex-Navy aircraft carrier, the USS. John F Kennedy from Norfolk to Philadelphia.

The contracted salvor's firefighting crew arrived in Newark as the equipment was being loaded on the ATLANTIC ENTERPRISE's expansive back deck. Five-10' aircraft containers, several pump skids, hoses, and monitors were loaded directly on deck. Knowing the stricken ship was in the middle of the North Atlantic in winter, the gear was lashed with an abundance of caution, realizing it could be very rough and the time to lash equipment was not once it started moving around on a pitching deck.



Combined Salvage and Marine Firefighting Management Team Tabletop Exercise

Once all was secure, at 2330 January 6th, ENTERPRISE departed the placid waters of New York headed east-northeast towards the burning vessel. Winds were easterly 15-20 knots with a building 4-6 foot sea. At the same time, three other vessels were tasked to intercept the burning vessel. The salvage master boarded one of these other contracted response vessels in Halifax, Canada and they also set course towards the burning vessel.

It didn't take the crew and salvage firefighters aboard ATLANTIC ENTERPRISE long to realize that it was not going to be an easy ride. Once clear of the harbor, seas quickly grew to an excess of 10'. By late Tuesday, January 8th, seas had built to 20-30' and a hose reel had broken loose on deck. As it slid around on deck it struck a fuel tank vent on the ENTERPRISE, cracking it. This allowed water to leak into the tugs' fuel tank, and soon thereafter the vessel lost generator power. The crew quickly realized the problem, switched fuel tanks, repaired the leak and drained the water out of the affected tank.

On Wednesday morning, seas were a consistent 20-30' and one container had broken free from its chain binders. The firefighting crew was able to save some equipment from the container before it went



overboard, and a more comfortable course was found. But by Thursday morning, ENTERPRISE was in the worst of the storm. As conditions continued to worsen, seas were up to 50' at times and these seas, washing across the tug's deck, were wreaking havoc on the chained equipment. Three additional containers washed overboard, and the heavy firepump skid broke free, sliding to the starboard stern of the tug's deck.

The decision was made to seek refuge at Halifax, moving out of the path of the storm and running with seas, putting the tug less at risk to the heavy rolls, icing and pounding she was taking en-route to the casualty location.

On Friday, a fifth container washed overboard but conditions were moderating as winds dropped to under 40 knots and sea conditions became less severe. ENTERPRISE made it to Halifax Saturday afternoon without further incident, but all onboard had a deeper respect for the power of the sea and the necessity for being ready for whatever that sea could produce.

The other vessels, which were all well over 220' in length and had departed from St John's, Halifax, and Rotterdam, moving around the low that affected ENTERPRISE, made it safely to the burning ship. The

Combined Salvage and Marine Firefighting Management Team Tabletop Exercise

salvage master boarded the vessel and working with the ship's master, managed to keep the fire under control even as teams fought to find its source and extinguish it.

Having a solid multifaceted plan with options available to respond to whatever nature and the environment can present is the key to any successful salvage operation. These options are sometimes only possible with adequate notification and request for resources.

For plan holders not involved in this response, proper notifications are exercised (and credit taken) by your participation in the IMT TTX and/or your vessels conducting the Remote Assessment and Consultation exercise as indicated under the previously noted objectives attachments.

C. Communications System;

During each response Donjon-SMIT undertook in 2019, Donjon-SMIT, within the incident command structure (or with the owner[s] crisis management team), successfully executed internal and external communications by multiple methods. Communications within the Salvage and MFF Management Team and operations onboard the vessel(s) were executed as planned, with information flowing from the command post (or owner[s] crisis management team) to the salvage team aboard the vessel and the reverse. Daily progress reports documenting the salvage and marine firefighting efforts were produced by the Salvage and MFF Management Team and provided to all parties involved in the response. These daily progress reports (DPRs) included:

- Encountered weather onsite;
- A summary of operational activities and their time conducted;
- Operations planned for the next 24 hours;
- Operational milestones;
- Craft on hire;
- Equipment on hire;
- Personnel;
- Visitors; and,
- Points of consideration.

TIME	ACTIVITY	PERSONNEL
0800	Preparation of salvage plan	Donjon-SMIT
0830	Meeting with Donjon-SMIT	Donjon-SMIT
0900	Salvage team departure	Donjon-SMIT
0930	Arrival at site	Donjon-SMIT
1000	Initial assessment and planning	Donjon-SMIT
1030	Deployment of salvage equipment	Donjon-SMIT
1100	Commencement of salvage operations	Donjon-SMIT
1130	Progress report to Donjon-SMIT	Donjon-SMIT
1200	Lunch break	Donjon-SMIT
1230	Resumption of salvage operations	Donjon-SMIT
1300	Weather update and plan adjustment	Donjon-SMIT
1330	Continuation of salvage operations	Donjon-SMIT
1400	Final assessment and reporting	Donjon-SMIT
1430	Departure from site	Donjon-SMIT
1500	Arrival back at base	Donjon-SMIT
1530	Debriefing and reporting	Donjon-SMIT
1600	Final report preparation	Donjon-SMIT
1630	Handover of salvage plan	Donjon-SMIT
1700	End of day	Donjon-SMIT

D. Ability to Access Salvage & MFF Provider;

As prescribed by the pre-established OPA-90 Salvage, Firefighting and Lightering Contract and Funding Agreement, Donjon-SMIT and the plan holder(s) agreed to appropriate follow-on contract terms. With the funding agreement(s) already in place, Donjon-SMIT, as

Combined Salvage and Marine Firefighting Management Team Tabletop Exercise

the salvage and MFF Management Team was able to rapidly initiate a local response, followed by a cascade of regional and international personnel and equipment as each situation required.

E. Coordination of personnel responsible for, and deployment of, resources identified for spill prevention, salvage, MFF

The coordination of response personnel and resources that are activated in accordance with a Vessel Response Plan (VRP) is accomplished on several levels through the Incident Management Team (IMT) and through the Incident Command System (ICS) structure. The Incident Command System (ICS) is a management system designed to enable effective and efficient incident management by integrating a combination of facilities, equipment, personnel, procedures, and communications operating within a common organizational structure. ICS is normally structured to facilitate activities in six major functional areas: command, operations, planning, logistics, finance and administration. The size and structure of the ICS is highly flexible to adapt to incidents of any size or scope.

Some of the various components of a plan holder's USCG Vessel Response Plan (VRP) include:

1. Notification procedures regarding the Qualified Individual (QI), USCG, affected State, Oil Spill Removal Organizations (OSROs), Salvage and Marine Firefighting (SMFF) provider, etc.
2. Spill mitigation procedures concerning shipboard response, casualty actions, damage stability and health and safety issues.
3. Shore-based response activities such as the QI's responsibilities, company crisis management team involvement and use of the Incident Command System (ICS) for response management.
4. Response contractor activities and capabilities including spill containment, recovery and environmental protection.
5. Salvage activities involving the SMFF provider.
6. Media management.

As your SMFF provider, from the onset of a notification of an incident and an activation of a response plan by a plan holder, Donjon-SMIT engages and manages salvage personnel and resources as needed. Coordination with vessel owners, QI, USCG, State, OSROs and other parties is done through ICS. The SMFF function is typically under the Operations section.



Combined Salvage and Marine Firefighting Management Team Tabletop Exercise

Of the Specialized Salvage Services as defined the SMFF regulations, such as a *Subsurface Product Removal and Heavy Lift*, both were utilized during 2019. Personnel competent in Specialized Salvage Services were involved in the response as part of the SMFF Management Team.

Shore-based Marine Firefighting (MFF) TTX Objectives (F through I)

**(F. Remote assessment and consultation; G. On-site fire assessment; H. External firefighting teams; I. External vessel firefighting systems.)*

Objectives F through I of the shore-based MFF TTX were met by the Salvage and MFF Management Team during responses to the containership fire and the capsized car carrier. Cross-trained and experienced personnel for both salvage and MFF services conducted the remote assessment and consultation, and the subsequent on-site assessment. The salvage team was comprised of marine firefighting trained personnel.

Appropriate types of external vessel firefighting systems that are identified in the location specific SMFF Geographic Specific Annexes (incorporated by reference into VRPs) were deployed. Some of the deployed equipment with our team included:

- ✓ FiFi Capable Tugs
- ✓ Foam
- ✓ Fire Pumps and Hoses
- ✓ Positive Pressure Breathing Apparatuses
- ✓ Air Supply
- ✓ Emergency Escape Breathing Devices



F. Annual review of the transition from local team to commercial, regional, national and international team as appropriate.

During the remote assessment and consultation process, it is standard practice for Donjon-SMIT to evaluate the incident and condition of the vessel to determine the appropriate level of response personnel and assets. In some cases, response from local and regional personnel is appropriate. In other larger responses, a national and an international team is necessary to handle a multi-day/week-long response.

During this year's responses, local, national and international team members were deployed.

Combined Salvage and Marine Firefighting Management Team Tabletop Exercise

G. Ability to coordinate response activity effectively with the IMT and NRS infrastructure.

The SMFF Management Team integrated within the IMT during all incidents from the early moments of activation. For those incidents that had an Incident Command Post, daily meetings occurred to brief the Command and General Staff, which included the Incident Commander (responsible party) and the USCG. These meetings covered discussions on SMFF response tactics, pollution contingency plans, and various salvage and operations plans. The plans reviewed by the IMT, in conjunction with review by the USCG's Salvage Engineering Response Team (SERT), included:

- Site Safety and Health Plan
- Project Specific Dive Plan
- Assessment of Structural Stability Findings
- Salvage Plan
- Marine Operations and Lightering Sequence Plan



H. Ability to access information in the ACP for resources available in the area, unique conditions of the area, etc.

Area Contingency Plan(s) were utilized to identify sensitive nearby locations and develop an environmental protection plan where necessary. The ACP(s) were also reviewed for appropriate berths for sheltering and lightering operations, depending on the evolving requirements of the variously sited casualties.

Combined Salvage and Marine Firefighting Management Team Tabletop Exercise

Recommendations/Comments

During 2019, Donjon-SMIT's Management Team came to the assistance of clients in almost all the areas of the United States, responding to vessel incidents at pier, nearshore, offshore and beyond. There were incidents of various types which tested the communications and coordination that occurs between the vessel owner/operator, Qualified Individuals, USCG, the relevant State, Class representative, Donjon-SMIT, and other members of the response community. The responses offered real world incidents that exercised company representatives in incident response and allowed the opportunity to review appropriate emergency procedures.

As a reminder, effective response efforts that prevent damage to the environment require prompt notifications. Notification of an issue or potential issue during a Remote Assessment and Consultation does not necessarily result in the activation of SMFF personnel and resources. Notification does, however, alert Donjon-SMIT to a situation that may require salvage services and allow us to begin identifying and organizing the closest and best suited response assets and personnel.

Donjon-SMIT recommends that each client plan holder review their emergency procedures in-office as well as onboard individual vessels. Regardless of the type of incident that generates a response, timely activation of your vessel response plan (VRP) ultimately results in a more effective and rapid response that protects the environment and saves both time and resources.

We also suggest that when participating in your IMT TTX with your Qualified Individual, that you address any questions you may have about salvage and MMF concerns during a response. Additionally, each client plan holder should consider holding an annual in-office exercise(s) to train for U.S. and global incidents. These training sessions should be documented and lessons-learned shared with staff and vessel personnel.



Combined Salvage and Marine Firefighting Management Team Tabletop Exercise

Closing

Donjon-SMIT was involved in several responses in various U.S Captain of the Port Zones, each with its own unique topography and environmental concerns. Robust responses initiated by owners and operators resulted in a timely resolution to each situation. Working together, you, the Plan Holder, and we, your chosen SMFF provider, Donjon-SMIT, successfully dealt with all manner of marine casualties, saved lives and property, and protected our precious environment and natural resources.

This report confirms that Donjon-SMIT (as the Salvage and Marine Firefighting Management Team) and by extension its client plan holders have met the stated objectives of the Salvage and Marine Firefighting Management Team Tabletop Exercise. Thus, vessel plan holders who name Donjon-SMIT as their Salvage and Marine Firefighting Service Provider have met the intent of the USCG 2016 PREP guidelines. Finally, companies should maintain the letter of attestation and certification contained in this document to document full compliance with PREP's annual SMFF TTX and equipment deployment exercise requirements.

We trust this documentation and evaluation of the multiple responses in 2019, and the utilization of Donjon-SMIT as the Salvage and Marine Firefighting Management Team, have been helpful. If you have any questions, please do not hesitate to contact us.

Checklist: Salvage Management Team Table Top Exercise Objectives Tested

The following objectives as identified in the 2016 PREP Guidelines were exercised and evaluated through actual performance, discussion, or simulation. Note that as stated in the 2016 PREP Guidelines:

“Plan holders may take credit for exercise requirements that are met by activities conducted in conjunction with other exercises, or during response to an actual incident, as long as the PREP exercise objectives are met, the response was evaluated, and the proper records are maintained.”

3.11.A. Knowledge of the response plan.

Fulfilled by: IMT TTX RACE This Exercise Not Met N/A

3.11.B. Proper Notifications:

Test the notification procedures identified in the response plan being exercised.

Fulfilled by: IMT TTX RACE This Exercise Not Met N/A

3.11.C. Communications System:

Demonstrate the ability to establish an effective internal and external communications system for the response organization.

Fulfilled by: IMT TTX RACE This Exercise Not Met N/A

3.11.D. Ability to Access Salvage Provider:

Ability to access a salvage provider identified in the response plan.

Fulfilled by: IMT TTX RACE This Exercise Not Met N/A

3.11.E. Coordination of personnel responsible for and deployment of resources identified for spill prevention and salvage:

3.11.E.1. Remote Assessment and Consultation.

Fulfilled by: IMT TTX RACE This Exercise Not Met N/A

Checklist: Salvage Management Team Table Top Exercise Objectives Tested

3.11.E.2. *Begin Assessment of Structural Stability.*

Fulfilled by: IMT TTX RACE This Exercise Not Met N/A

3.11.E.3. *On-Site Salvage Assessment.*

Fulfilled by: IMT TTX RACE This Exercise Not Met N/A

3.11.E.4. *Assessment of Structural Stability.*

Fulfilled by: IMT TTX RACE This Exercise Not Met N/A

3.11.E.5. *Hull and Bottom Survey.*

Fulfilled by: IMT TTX RACE This Exercise Not Met N/A

3.11.E.6. *Emergency Towing.*

Fulfilled by: IMT TTX RACE This Exercise Not Met N/A

3.11.E.7. *Salvage Plan.*

Fulfilled by: IMT TTX RACE This Exercise Not Met N/A

3.11.E.8. *External Emergency Transfer Operations.*

Fulfilled by: IMT TTX RACE This Exercise Not Met N/A

3.11.E.9. *Emergency Lightering.*

Fulfilled by: IMT TTX RACE This Exercise Not Met N/A

3.11.E.10. *Other Refloating Methods.*

Fulfilled by: IMT TTX RACE This Exercise Not Met N/A

Checklist: Salvage Management Team Table Top Exercise Objectives Tested

3.11.E.11. Making Temporary Repairs.

Fulfilled by: IMT TTX RACE This Exercise Not Met N/A

3.11.E.12. Diving Services Support.

Fulfilled by: IMT TTX RACE This Exercise Not Met N/A

3.11.E.13. Special Salvage Operations Plan.

Fulfilled by: IMT TTX RACE This Exercise Not Met N/A

3.11.E.14. Subsurface Product Removal.

Fulfilled by: IMT TTX RACE This Exercise Not Met N/A

3.11.E.15. Heavy Lift.

Fulfilled by: IMT TTX RACE This Exercise Not Met N/A

3.11.F. Annual review of the transition from local team to commercial, regional, national and international team as appropriate.

Fulfilled by: IMT TTX RACE This Exercise Not Met N/A

3.11.G. Ability to coordinate response activity effectively with the IMT and NRS infrastructure.

Fulfilled by: IMT TTX RACE This Exercise Not Met N/A

3.11.H. Ability to access information in the ACP for resources available in the area, unique conditions of the area, etc.

Fulfilled by: IMT TTX RACE This Exercise Not Met N/A

Checklist: Marine Firefighting Management Team TTX Objectives Tested

The following objectives as identified in the 2016 PREP Guidelines were exercised and evaluated through actual performance, discussion, or simulation. Note that as stated in the 2016 PREP Guidelines:

“Plan holders may take credit for exercise requirements that are met by activities conducted in conjunction with other exercises, or during response to an actual incident, as long as the PREP exercise objectives are met, the response was evaluated, and the proper records are maintained.”

3.12.A. Knowledge of the response plan and when exercising the MFF team, the pre-fire plan.

Fulfilled by: IMT TTX RACE This Exercise Not Met N/A

3.12.B. Proper Notifications:

Test the notification procedures identified in the response plan being exercised.

Fulfilled by: IMT TTX RACE This Exercise Not Met N/A

3.12.C. Communications System:

Demonstrate the ability to establish an effective internal and external communications system for the response organization.

Fulfilled by: IMT TTX RACE This Exercise Not Met N/A

3.12.D. Ability to Access an MFF Provider:

Ability to access a marine firefighting provider identified in the response plan.

Fulfilled by: IMT TTX RACE This Exercise Not Met N/A

3.12.E. Coordination of internal organization personnel with responsibility for spill prevention and MFF.

Fulfilled by: IMT TTX RACE This Exercise Not Met N/A

Checklist: Marine Firefighting Management Team TTX Objectives Tested

3.12.F. Remote Assessment and Consultation.

Fulfilled by: IMT TTX RACE This Exercise Not Met N/A

3.12.G. On-site Fire Assessment.

Fulfilled by: IMT TTX RACE This Exercise Not Met N/A

3.12.H. External Firefighting Teams.

Fulfilled by: IMT TTX RACE This Exercise Not Met N/A

3.12.I. External Vessel Firefighting Systems.

Fulfilled by: IMT TTX RACE This Exercise Not Met N/A

3.12.J. Annual review of the transition from local team to commercial, regional, national and international team as appropriate.

Fulfilled by: IMT TTX RACE This Exercise Not Met N/A

3.12.K. Ability to coordinate response activity effectively with the IMT and NRS infrastructure.

Fulfilled by: IMT TTX RACE This Exercise Not Met N/A

3.12.L. Ability to access information in the ACP for resources available in the area, unique conditions of the area, etc.

Fulfilled by: IMT TTX RACE This Exercise Not Met N/A

Equipment Deployment – Vessels (SMFF equipment)

Applicability, Frequency, and Initiating Authority

Vessels with SMFF equipment cited in their plans, conduct an annual SMFF equipment deployment exercise. Equipment Deployment is initiated by company policy, or via an actual response through Vessel Response Plan (VRP) Activation.

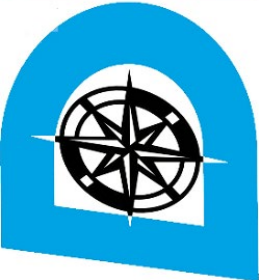
Donjon-SMIT 2019 PREP Equipment Deployment Summary Report

Please find below the Donjon-SMIT 2019 Annual Preparedness for Response Exercise Program (PREP) Equipment Deployment Summary Report for review and retention. This report documents SMFF equipment deployment exercise information in compliance with the Preparedness for Response Exercise Program (PREP) Guidelines for reportable and evaluated equipment deployments during exercises, training and actual salvage responses. It provides information necessary for your SMFF equipment deployment credit for the 2018 calendar year, the third year of a triennial cycle.

The information categories include:

- **COTP ZONE** - The COTP Zone in which the response equipment was deployed
- **LOCATION** - The geographical location in which the equipment was deployed.
- **EXERCISE OR ACTUAL RESPONSE** – Identifies whether the equipment was deployed during an exercise or an actual response.
- **ANNOUNCED OR UNANNOUNCED** – Whether the equipment was deployed during a planned event, or if the exercise (if not a response) is unannounced.
- **OPERATING AREA** – Which SMFF operating area was the equipment deployed in; Pier, Nearshore, Offshore, or Other.
- **SALVAGE AND/OR MARINE FIREFIGHTING** – Denotes the salvage and/or marine firefighting service involved in the deployment.

SALVAGE



**An
OPA-90
Alliance**

Individual Plan Holder SMFF TTX Requests/Pricing

Overview

Donjon-SMIT meets all clients' TTX requirements free of cost without your direct involvement. Any TTX exercises conducted by our clients are voluntary.

Plan holders may wish to have customized and direct participation of their Salvage and Marine Firefighting Management Team in their IMT TTX and other exercises. Although this is not required for your PREP SMFF TTX requirements credit, Donjon-SMIT is happy to accommodate this request to participate in TTXs either remotely or to attend at the location of the exercise if possible. Donjon-SMIT can customize the scale of involvement, and the amount of personnel involved, depending on your needs.

Remote TTX Participation

Remote TTX Participation:

Personnel Type	Announced Remote TTX Rate	Unannounced Remote TTX Rate
Salvage Master	\$676	Surcharge 2x
Naval Architect or Salvage Officer/Engineer	\$564	Surcharge 2x
Assistant Salvage Officer/Engineer, or Contracts Mgr.	\$452	Surcharge 2x
Specialist Advisors – Fire Fighters, Chemicals, Pollution	\$454	Surcharge 2x

In House TTX Participation

For TTX's where Donjon-SMIT's participation is conducted via on-site participation for a 1 day drill.* (Donjon Smit will minimize travel where possible by utilizing personnel in the vicinity of your TTX where travel is required. Domestic participation will be charged for the actual day of the drill or multiple days for drills covering more than 1 day. For drills where international travel is required 2 additional days hire for travel to and from will be added.)

Personnel Type	In House TTX Rate
Salvage Master	\$1,353
Naval Architect or Salvage Officer/Engineer	\$1,128
Assistant Salvage Officer/Engineer, or Contracts Mgr.	\$904
Specialist Advisors – Fire Fighters, Chemicals, Pollution	\$907

**Travel costs (if any) billable at cost with 10% uplift*

Participation in Other Exercises

Donjon Smit is pleased to discuss any of your custom exercise needs. Please contact us with your Exercise requirements and our team can prepare a specific proposal for your requirements.



Attestation and Certification

Date: December 31, 2019

Dear Valued Donjon-SMIT Clients,

I, Timothy P. Williamson of Donjon-SMIT, LLC, a Salvage and Marine Firefighting Service Provider (SMFF) with full SMFF coverage in all Captain of the Port Zones, for all operating areas within the United States do hereby attest, based on my own personal knowledge, that all the salvage and marine firefighting objectives under the SMFF TTX provisions of the 2016 PREP guidelines have been met for 2019. Additionally, that salvage and marine firefighting equipment, more than adequate to satisfy the SMFF equipment deployment drill requirements of OPA '90 have been deployed on your behalf in the United States within the most recent calendar year, the first year of a new triennial cycle.

Further that Donjon, SMIT, and/or Donjon-SMIT owned equipment is inspected and maintained under a formal preventive maintenance program. Personnel training requirements are met through formal training and apprentice programs. The personnel who deployed the equipment demonstrated their ability to successfully deploy and operate the equipment and the equipment was in good working order.

Further, records of these above-mentioned activities are maintained at our headquarters in Houston, Texas, USA. This certification is good for all plan holders who list Donjon-SMIT, LLC as their OPA-90 SMFF provider, for the year 2019, for the following PREP exercises:

- 3.11 TTX: Shore-based Salvage Exercise
- 3.12 TTX: Shore-based Marine Firefighting Exercise
- 3.15 DRILL: Equipment Deployment – Vessels (SMFF Equipment)

Best Regards,

Timothy P. Williamson

General Manager

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