

Salvage and Marine Firefighting Tabletop & Equipment Deployment Exercises

FOR YEAR 2022

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



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To Our Clients

2022 was consistently busy and we expect the trend to continue in 2023 ...

Much like last year, 2022 was filled with OPA-90 cases, drills and tabletop exercises, and events that enabled us to compile comprehensive information to document in this year's Donjon-SMIT Tabletop & Equipment Deployment Exercise in fulfillment of PREP Guidelines Sections 3.11, 3.12, and 3.15.

Ranging from high-profile vessel groundings to shipboard fires to dive works to emergency towage and to other SMFF services, Donjon-SMIT responded to a total of 14 cases in 5 USCG Districts and 10 USCG Sectors. Up to the end of November, a total of 1562 telephone calls to our 24/7 number were made with 920 calls related to drills and exercises and 23 vessel emergencies. Statistics supporting these service counts will be further reflected in the following chapters.

And though not all cases or emergency situations require mobilizing a salvage team, Donjon-SMIT mobilized an array of resources as appropriate and as required for each specific situation. Personnel, vessels, dive equipment, fire-fighting gear, ground-tackle, and drones were all deployed. In several cases, a remote consultation sufficed to address our client vessel's concerns. In every case, our OPA-90 team and our joint venture parent company partners, Donjon Marine and SMIT Salvage, have been honored to serve you.

Donjon-SMIT strongly encourages our clients to contact us in accordance with the OPA-90 regulations, "*in any incident involving a vessel that may create a significant risk of discharge of oil … such incidents include, but are not limited to, groundings, strandings, collisions, hull damage, fire, explosion, loss of propulsion, flooding, on-deck spills, or other similar occurrences*". But we also encourage clients to contact us regarding a drill or exercise, recovery of vessel apparatus or for any other maritime industry related inquiry where we could provide guidance.

An example of this occurred when one of our client's subsidiaries operating in Western Africa dialed our +1 703 299 0081 number. The situation turned out to be a significantly damaged FSO which then turned into a major SMIT Americas project. Another example was the swift proactiveness of a client when, in late November, Donjon-SMIT was placed on alert for assistance pertaining to the potential cutting of lift boat legs. Fortunately, the severing of the legs proved unnecessary, and the lift boat was towed to the shipyard for repairs. And finally, one of our clients and his QI together telephoned Donjon-SMIT regarding winter layup preparedness for shipboard fires in the Great Lakes region. Donjon-SMIT formulated an OPA-90 reminder guidance document outlining existing regulations with a list of USCG-approved resources in the event of a shipboard fire in the Great Lakes region.

Thank you once again for placing your trust in Donjon-SMIT for all your OPA-90 Salvage and Marine Firefighting needs. Our team is here to assist you in the complex and ever-changing world of US regulatory compliance as well as with any emergency vessel situation.

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 and Donjon-SMIT Americas clients to participate in the tabletop exercise through comments on this documentation. Additionally, Donjon-SMIT personnel are available to participate directly in your company's 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 2022, Donjon-SMIT was engaged in 14 cases 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.

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 reduced the likelihood of situations escalating or deteriorating, which ultimately saved clients and their underwriters the considerable costs attendant to environmental restoration efforts. Donjon-SMIT protects both shipowners 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, Donjon-SMIT Americas, SMIT and/or Donjon:

D. Martin	J. Witte	Z. Malinoski	T. Williamson
R. Fredricks	G. Hernandez	M. Weinand	L. McOwen
C. Larson	N. Driscoll	K. Edgar	D. Cocca
B. Kratz Jr.	S. Newes	* J. Sluijmers	* M. Haldenwang
S. Petrosino	G. Lorenson	M. Lozano	E. Geraldes
P. Chlodnicki	S. Crowe	* R. van Vliet	O. Lopez
V. DelMaestro	J. Feld	R. Rollins	* S. van Wijnbergen
W. Naegele	I. Morgan	S. Deutsch	T. Flannery
M. Rexton	W. Bradley	M. Hardin	* E. Martinez
M. Kearns	C. Riddick	* W. Huismans	* J. Martina
R. Holden	P. Painten	* A. Gorter	* C. Bos
R. Martinez	S. Gibbs	B. Yandoli	E. Hickey
J. Zelenick	* C. Erasmus	D. Wisse	 T. Verheugd
P. Schelfout	J. Shields	• V. Li	 A. Maricar
 N. Petmezas 	 N. de Goffau 	 E. Kang 	 K.H. Yang

* = international Donjon-SMIT project team members as per section F of this TTX

= international Donjon-SMIT commercial team members as per section F of this TTX

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:	Exercise or Actual Response:
January 2022 through December 2022	Both: QI + Client Exercises and Donjon-SMIT Actual Responses and TTX
Initiation Time:	If an exercise, announced or unannounced:
Various	Both: Unannounced and Announced (participation was in-person and remote).
Completion Time:	Location:
Various	Captain of the Port Zones:
Valiono	ouplain of the Fort Eerico.

Response plan scenario used:

- ✓ Grounding or Stranding
- ✓ Collision/ Allision
 ✓ Hull Damage
- ✓ Fire/ Explosion
- ✓ Loss of Propulsion
- ✓ Flooding
- ✓ Equipment Failure
- ✓ Capsizing
 ✓ Oil/ HAZMAT Spill
- ✓ Structural Damage

- Baltimore-NCR •
- Delaware Bay
- Virginia (Hampton Roads)
- Savannah •
- Jacksonville •
- Miami
- Charleston
- Mobile
- New Orleans •
- Houston-Galveston
- Corpus Christi
- Lake Michigan
- San Francisco •
- Anchorage

A. Knowledge of the response plan and, when exercising the MFF team, the Pre-fire Plan

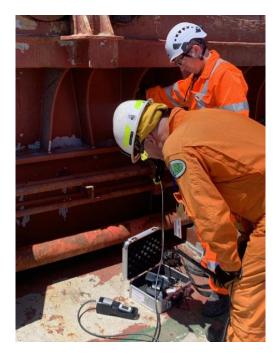
The first half of the year proved to be active, with several marine firefighting cases. In January in Sector Houston-Galveston a case involved a 37,692 DWT bulk carrier. Donjon-SMIT mobilized a firefighting response team comprised of firefighting and salvage experts. Fortunately for this case, Donjon-SMIT had redelivered a bulk carrier which had grounded that same day also in Sector Houston-Galveston, so the salvage team was actually forward of the redelivered grounded vessel and the response was virtually instant. Firefighting pumps, generators, foam, and dewatering pumps were mobilized out of our Houston headquarters and a receiving tug and barge was locally sourced for disposal of the contaminated water.

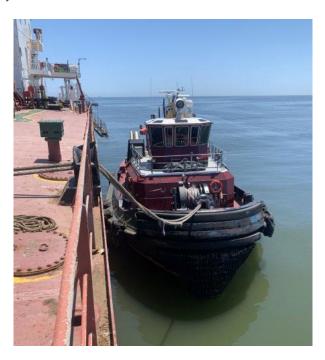


In June, Donjon-SMIT mobilized resources to three (3) back-to-back firefighting cases, all in the US east coast, each in different USCG Sectors with different cargoes.

Of these three MFF cases, the first began when Donjon-SMIT received a telephone VRP activation from the Qualified Individual of a fully laden 58,096 DWT bulker carrying scrap metals. The vessel was experiencing elevated temperature readings and vapors escaping from two of the five cargo hold hatches. The USCG Lieutenant Commander for Sector Delaware Bay, Chief, Inspections Division, issued a Captain of the Port order to the vessel requiring VRP activation. Donjon-SMIT was tasked to swiftly provide plans to board the vessel and once onboard, to prepare inspection and firefighting tactics to be employed should firefighting efforts be necessary. USCG quickly reviewed the plans provided and authorized Donjon-SMIT

engagement of the proposed resources. Donjon-SMIT's salvage team, comprised of Salvage Master, a Firefighting Expert from our exclusive provider, Industrial Emergency Services, the client's representatives, and experts from Delaware State boarded the vessel to evaluate the state of the reaction, to establish safety requirements and to determine the way forward. Meanwhile ashore, at the discretion of USCG, Donjon-SMIT mobilized a 12,000 gpm FIFI tug and added MFF resources in preparedness for a worst-case situation should firefighting be required. This was a four-day event where the experts onboard carried out tactics to safely minimize temperature and gas readings. The swift engagement with the QI and the USCG proved to be very positive as the alternative could have been a catastrophic situation. The dialogue with our client was positive as the matter was swiftly and smoothly closed out.





The second MFF case was dockside in Sector Jacksonville where the crew and local municipal fire department combated the fire onboard a 37,692 DWT bulk carrier in the vessel's cargo hold #5. The cargo was comprised of approximately 6,618 MT of plywood bundles. Fortunately, the readiness of the crew in conjunction with the local fire department's understanding of the fire control plan enabled a swift fire-fighting response. In this case, Donjon-SMIT was mobilized on behalf of the Qualified Individual to perform on-site inspection and naval architecture calculations. Our client for this case is located in Singapore and we continue to dialogue with the client to formally close out this two-day event via our SMIT Singapore colleagues

The third and most impactful MFF for 2022 was the firefighting response to a pier-side shipboard (engine room) fire on a 169-foot passenger vessel located in USCG Sector Virginia; Pier 4, Naval Station Norfolk. Donjon-SMIT's services were engaged pursuant to the OPA-90 vessel response plan activation, which included dewatering services. While this case is currently under investigation by the USCG and the National Transportation Safety Board (NTSB), due its classification as a major marine casualty, Donjon-SMIT is pleased to report our client and their underwriters have properly closed out this response and Donjon-SMIT will continue to support our client throughout the ongoing investigation.

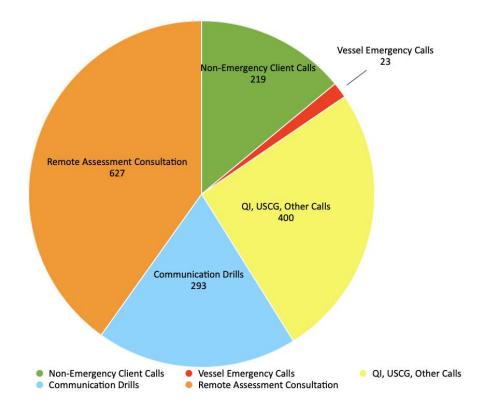


For plan holders not involved in these responses, knowledge of the response plan is exercised (and credit taken) by your participation in the IMT TTX as indicated under the previously noted objectives attachments.

B. Proper Notifications

Donjon-SMIT strongly urges our clients, the vessel owners and/or vessel master, to provide swift and proper notification to the U.S. Coast Guard, their Qualified Individual and to Donjon-SMIT directly following any marine casualty that may present a threat of pollution.

From January through November 2022, a total of 1,562 telephone calls were received to our 24/7 telephone number +1 786 266 6396.



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

Upon initial notification of an incident, Donjon-SMIT responds immediately with a core team (composed of emergency salvage response team members as necessary for the specific incident). The core team assesses the situation to survey the damage and determine resources requirements, arranging for dive teams, firefighting teams, and engineering backup as necessary. The prime responsibilities of the core team include:

- Assessment of situation/damage survey
- Stabilization
- Communications with other on-site responders (port, state, class, local firefighting, and oil spill response companies)
- Equipment/personnel setup
- Inshore liaison and logistics set up
- Development of salvage plan
- Initial response execution

Donjon-SMIT builds each salvage response effort on the incident-specific foundation established by our core team, which enables Donjon-SMIT to quickly and efficiently respond to all types of incidents throughout the U.S. with a wide variety of equipment and specially trained personnel.

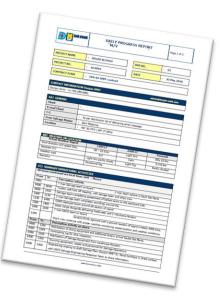
As defined by PREP, the remote assessment and consultation means contacting the SMFF resource provider identified in the VRP, by phone or other means of communications, to discuss and assess an SMFF situation. The person contacted must be competent to consult on a determination of the appropriate course of action and initiation of a response plan.

Although not a specific responsibility within the scope of the OPA-90 contracts, we focus on prevention of personal injury. If Donjon-SMIT can prevent injury or loss of life, we will take all reasonable measures to do so.

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.



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 contract terms. With the funding agreement(s) already in place, Donjon-SMIT, as 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.



For Emergencies Call 1-703-299-0081

Emergency Marine Response

Salvage – Lightering – Firefighting

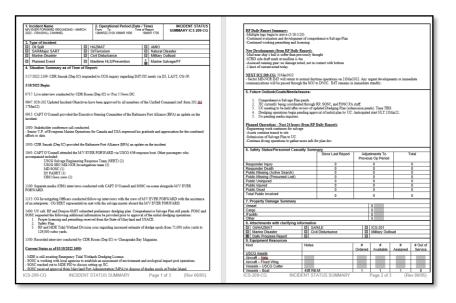
E. Coordination of personnel responsible for, and deployment of, resources identified for spill prevention, salvage, MFF

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 salvage personnel manages and resources as needed. Coordination with vessel owners, QI, USCG, State, OSROs and other parties is accomplished through the ICS. The SMFF function is typically under the Operations section; sample of ICS-209-CG form shown here.



Of the Specialized Salvage Services as defined the SMFF regulations, such as a *Specialized Salvage Operation Plan* and *Heavy Lift*, both were utilized during 2022. Personnel competent in Specialized Salvage Services engaged in the response as part of the SMFF Management Team.



As we all know by now, the salvage of the M/V EVER FORWARD took place from 13 March through 17 April in USCG Sector Baltimore (Maryland-National Capital Region) when Donjon-SMIT was tasked to refloat the vessel from her grounded position. From our on-site assessment and our discussion with all parties involved, this specialized salvage operation would employ multi-pronged salvage techniques that included a combination of dredging, fluid lightering, containers removal, external pulling and pushing forces due to the hard grounding, ground reaction and condition of the vessel.

In this case, we were able to leverage the strength of our joint venture parent company, Donjon Marine, thanks to their strategically situated headquarters and strong presence in the region. The engineering capabilities, man-power resources and the marine assets of our parent companies, combined with those of our GSA partners, were all vital to a swift and successful response.

Post the refloat, USCG, local, state and other stakeholders held a hot-wash specifically for this case. Donjon-SMIT's response earned us a perfect score card, "*Performed without challenges*" on six-out of six USCG criteria:

- Discuss the ability to assemble the response organization, the arability of the response organization to work within a Unified Command, and ability to operate within the National Incident Management System Incident Command System.
- 2) Discuss the ability of the response organization to effectively coordinate source control, discharge containment and introduce recovery discussions.

- 3) Discuss the ability of the response organization to conduct assessments for onsite fire, salvage, and structure stability, survey of hull and bottom, and arrival of external firefighting teams and vessel firefighting systems within the established salvage and marine firefighting (SMFF) services and response timeframes of 33 CFR Part 155 Subpart I.
- 4) Discuss the ability of the response organization to identify and prioritize environmentally and economically sensitive areas, wildlife habitats, and historic properties.
- 5) Discuss the ability of the response organization to establish an effective external/public affairs posture, identify who would be involved in a Joint Public Information Center, and processes for an initial press release.
- 6) Discuss establishment of an interagency/ private-sector Marine Transportation System Recovery Unit (MTSRU) to identify impacts to the Marine Transportation System (MTS) infrastructure and cargo flow, provide recommendations for stabilization, short term recovery activities, and restoring basic functionality of the MTS.

In addition to this being a successful project, Donjon-SMIT wishes to give special thanks to all parties involved in the salvage of the M/V EVER FORWARD. Below are key bullet points pertaining to this project and the regulatory agencies involved. Thank you to all our GSA subcontractors and our salvors who worked round-the-clock onsite and remotely in every corner of the world.

Finally, Donjon-SMIT earned the *Salvage Company of the Year Award* presented at *the 27th International Tug & Salvage Convention* for the salvage of the M/V EVER FORWARD where all the voting was done by industry peers; and for that we are thankful.



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 though I of the shore-based MFF TTX were met by the Salvage and MFF Management Team during the previously mentioned MFF responses and our MFF Equipment Deployments at various Donjon-SMIT depots. 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 is 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, the response from local and regional personnel is appropriate. In other larger responses, a national and an international team is necessary to manage a multi-day/week-long response. During this year's responses, local, national and international team members were deployed.



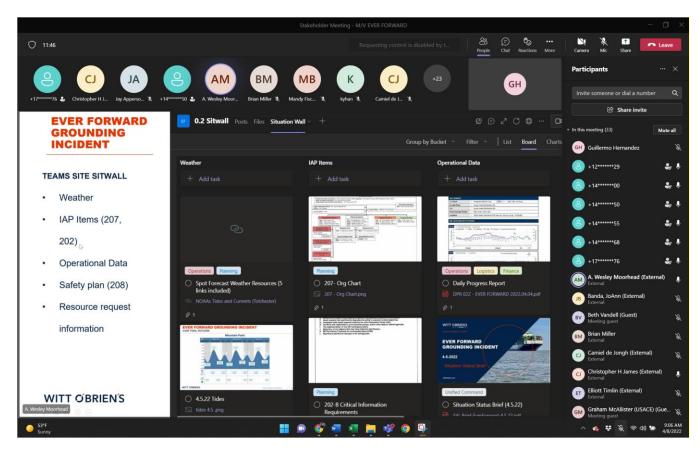
International MFF Team onboard a bulk carrier off Sector Delaware Bay comprised clocked wise of:

- Mr. Michael Oder, Deputy Fire Chief, IES exclusive Donjon-SMIT GSA provider USA
- Dr. Matthew E. Suddards, Fire Expert (Appointed by Owner's) UK
- Mr. Pierce N. Power, Forensic Engineer and Surveyor (Appointed by Owner's) Ireland
- Mr. Mario Haldenwang, Donjon-SMIT Salvage Master South Africa
- Capt. Christos Emmanuoil, Marine Superintendent (Owner's Rep.) Greece

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

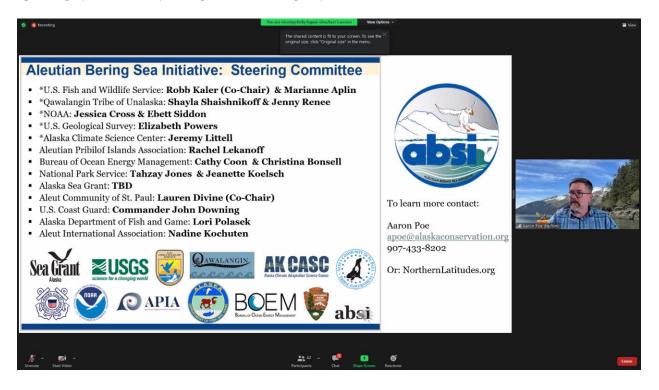
The SMFF Management Team is integrated within the IMT during all incidents from the early moments of activation. For those incidents that had an Incident Command Post, daily meetings occurred to brief the Command and General Staff, which included the Incident Commander (responsible party) and the USCG. 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 aforementioned casualties.



Recommendations/Comments

During 2022, Donjon-SMIT's Management Team came to the assistance of clients across 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 occur 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 allows 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, 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.

Closing

Donjon-SMIT engaged 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, secured 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 report 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 2022, 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 Tabletop Exercise Objectives Tested

Checklist: Salvage Management Team Tabletop 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		⊠ This Exercise	□ Not Met	□ N/A
3.11.B. Proper	Notifications:				
Test the notificatio	n procedures ident	ified in the respo	nse plan being exercised	d.	
Fulfilled by:	⊠ IMT TTX		⊠ This Exercise	□ Not Met	□ N/A
	unications Sys		al and external commun	ications system for	the response
Fulfilled by:	🛛 IMT TTX		⊠ This Exercise	□ Not Met	□ N/A
•	to Access Salv salvage provider id	-			
Fulfilled by:	⊠ IMT TTX		⊠ This Exercise	□ Not Met	□ N/A
	nation of perso spill prevention		sible for and deploy :	yment of resou	rces
3.11.E.1. I	Remote Assessme	ent and Consult	ation.		
Fulfilled by:	🗆 ΙΜΤ ΤΤΧ		⊠ This Exercise	□ Not Met	□ N/A

Checklist: Salvage Management Team Tabletop Exercise Objectives Tested

3.11.E.2. I	Begin Assessment	t of Structural S	tability.		
Fulfilled by:			⊠ This Exercise	□ Not Met	□ N/A
3.11.E.3. (On-Site Salvage As	ssessment.			
Fulfilled by:			⊠ This Exercise	□ Not Met	□ N/A
3.11.E.4.	Assessment of Str	uctural Stability	/.		
Fulfilled by:			⊠ This Exercise	□ Not Met	□ N/A
3.11.E.5. I	Hull and Bottom S	urvey.			
Fulfilled by:			⊠ This Exercise	□ Not Met	□ N/A
3.11.E.6. I	Emergency Towing	7 .			
Fulfilled by:			⊠ This Exercise	□ Not Met	□ N/A
3.11.E.7.	Salvage Plan.				
Fulfilled by:			⊠ This Exercise	□ Not Met	□ N/A
3.11.E.8. I	External Emergend	cy Transfer Ope	erations.		
Fulfilled by:			⊠ This Exercise	□ Not Met	□ N/A
3.11.E.9. I	Emergency Lighte	ring.			
Fulfilled by:			⊠ This Exercise	□ Not Met	□ N/A
3.11.E.10.	Other Refloating	Methods.			
Fulfilled by:			⊠ This Exercise	□ Not Met	□ N/A
3.11.E.11.	Making Temporar	y Repairs.			
Fulfilled by:			⊠ This Exercise	□ Not Met	□ N/A

Checklist: Salvage Management Team Tabletop Exercise Objectives Tested

3.11.E.12.	Diving Services Su	pport.			
Fulfilled by:	🗆 ІМТ ТТХ		⊠ This Exercise	□ Not Met	□ N/A
3.11.E.13.	Special Salvage Op	perations Plan.			
Fulfilled by:	🗆 ІМТ ТТХ		⊠ This Exercise	□ Not Met	□ N/A
3.11.E.14.	Subsurface Produc	et Removal.			
Fulfilled by:	🗆 ІМТ ТТХ		⊠ This Exercise	□ Not Met	□ N/A
3.11.E.15.	Heavy Lift.				
Fulfilled by:	🗆 ІМТ ТТХ		⊠ This Exercise	□ Not Met	□ N/A
	review of the tra nal team as appr		local team to com	mercial, regiona	II, national
Fulfilled by:	⊠ IMT TTX		⊠ This Exercise	□ Not Met	□ N/A
3.11.G. Ability infrastructure.	to coordinate re	sponse activ	ity effectively with	the IMT and NR	S
Fulfilled by:	⊠ IMT TTX		⊠ This Exercise	□ Not Met	□ N/A
	to access inforn ons of the area,		ACP for resources	available in the	area,

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

Checklist: Marine Firefighting Management Team TTX Objectives Tested

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		⊠ This Exercise	□ Not Met	□ N/A
3.12.B. Proper Test the notification		ied in the respon	se plan being exercised	!	
Fulfilled by:	⊠ IMT TTX		⊠ This Exercise	□ Not Met	□ N/A
	unications System bility to establish an		l and external communi	cations system for the	e response
Fulfilled by:	⊠ IMT TTX		⊠ This Exercise	□ Not Met	□ N/A
•	to Access an M marine firefighting p		l in the response plan.		
Fulfilled by:	⊠ IMT TTX		⊠ This Exercise	□ Not Met	□ N/A
3.12.E. Coordin prevention and		al organizatio	on personnel with r	esponsibility for	r spill
Fulfilled by:	⊠ IMT TTX		⊠ This Exercise	□ Not Met	□ N/A
	Assessment a	nd Consultat	ion. ⊠ This Exercise	□ Not Met	□ N/A
Fulfilled by:					

Checklist: Marine Firefighting Management Team TTX Objectives Tested

3.12.G. On-site	Fire Assessme	ent.			
Fulfilled by:			⊠ This Exercise	□ Not Met	□ N/A
3.12.H. Externa	al Firefighting T	eams.			
Fulfilled by:			⊠ This Exercise	□ Not Met	□ N/A
3.12.I. External	Vessel Firefigh	nting System	S.		
Fulfilled by:			⊠ This Exercise	□ Not Met	□ N/A
	review of the transmission review of the transmission review of the transmission review of the transmission of transmission of the transmission of		n local team to com	mercial, regiona	II, national
Fulfilled by:			⊠ This Exercise	□ Not Met	□ N/A
3.12.K. Ability infrastructure.	to coordinate re	esponse activ	vity effectively with	the IMT and NR	S
Fulfilled by:	⊠ IMT TTX		⊠ This Exercise	□ Not Met	□ N/A
· · · · · · · · · · · · · · · · · · ·	to access inform ons of the area,		ACP for resources	available in the	area,
Fulfilled by:	🖂 IMT TTX		⊠ 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 2022 PREP Equipment Deployment Summary Report

Please find below the Donjon-SMIT 2022 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 2022 calendar year.

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.

Actual Responses + Drills, TTX's and USCG Verifications

Equipment Deployment via Actual Responses

	D	ONJON-SMIT	PREP Equipment Deploym	ent 2022	2				Opera	ating	Area	i) A	ssessme	nt & Sui	rvey:		SA	ALVAGE ii) Stal	oilizatio	on:		ï	i) Specia		i.) Ass	larine Fi essment	ii.)) Fire
	COTP Zone	Date	Vessel Name / Type & Event	er ritse	vctual Response	mounced nannounced	SCG V etting Instar Drill	elephone Confirmation Drill abletop Exercise quipment Deployed	er	earsnore ffshore	ther	.) Remote assessment and consultation	.) Begin assessment of structural stability) On-cite salvage assessment	.) Assessment of structural stability	.) Hull and bottom survey	.) Emergency towing	.) Salvage plan) External emergency transfer operations).) Emergency lightering	.) Other renoating methods) Making temporary repairs	.) Diving services support	.) Special salvage operations plan	.) Subsurface product removal	:) Heavy Lift	.) Remote assess & consult	.) On-site fire assessment	.) External firefighting teams	.) External VSL firefighting systems
	Baltimore	13 Mar - 17 Apr	Containership - 127,076 DWT	ш	1	∢ ⊃ 1	2 2	<u>ере</u> 1	1	1	ľ	∢ 1	1		1	1	1	1	<u> </u>	<u> </u>	1	 ↓1		1	∢		<	<u> </u>
5	(Maryland-National Capital Region) Delaware Bay	31-Jan	Specialized Salvage Operation RO-RO - 4,393 DWT Diving Works		1	1		1	1			1		1	1					1	1 1	L						
DS	Delaware Bay	23-26 Jun	Bulk Carrier - 58,096 DWT Firefighting		1	1		1		1		1					1								1	1	1	1
	Virginia (Hampton Roads)	07-12 Jun	Passenger Vessel - 1151 GT Firefighting		1	1		1	1			1	1	1 1	1	1	1				1	L			1	1	1	1
	Jacksonville	27-29 Jun	Bulk Carrier - 37,692 DWT Firefighting		1	1			1			1													1	1		
D3	Savannah	29 Nov - 02 Dec	Containership - 109,835 DWT Hull and Bottom Survey		1	1			:	1		1			1													
	Houston-Galveston	16-22 Jan	Bulk Carrier - 58,096 DWT Grounding		1	1		1	1	1		1	1	1 1	1	1	1				1	L						
	Houston-Galveston	22-26 Jan	Bulk Carrier - 38,742 DWT Firefighting		1	1		1	1	1		1				1	1		1						1	1	1	1
D8	Houston-Galveston	21 Aug - 02 Sep	Bulk Carrier - 38,795 DWT Collision/ ER Vessel Escort		1	1		1		1		1	1	1 1			1											
 	Mobile	12-14 May	Bulk Carrier - 63,464 DWT Recovery of Overboard Man-Lift		1	1		1	:	1		1					1											
	Morgan City / Houma	28 Nov - 07 Dec	Lift Boat - 335 Class ER Services in Freeing Legs		1	1		1		1		1	1	1 1		1	1			1 1	L	1						
	New Orleans	14-17 Sep	Bulk Carrier - 54,958 DWT Grounding		1	1		1		1		1	1	1 1		1	1			1								
D9	Lake Michigan	06-08 Oct	Bulk Carrier - 29,691 DWT Emergency Towing		1	1				1		1				1	1											
D11	San Francisco	13-14 Aug	Research Vessel - 3,180 GT Emergency Towing		1	1				1		1				1	1											
			ACTUAL RESPONSE		14	1 13	0 0	0 0 10	6	83	0	14	6	76	5	8	11	1	2	3 2	2 4	1 2	0	1	4	4	3	3

Actual Responses + Drills, TTX's and USCG Verifications

Drills / TTX'S / USCG Verifications

	DRILLS / T	TX'S / USCG VERIFICATIONS	2022				Opera	ating A	rea	il Asses	sment 8	Survey			SALVAG ii) St	E Ibilizatio	on:		iii) S	ресан	200	Mari		fighting ILJ Fil	
COTP Zone	Date	Vessel Name / Type & Event	Exercise	Actual Response Amounced Amounced	USCG Vetting Muster Drill	Telephone Confirmation Drill Tabl etop Exercise Equipment Deployed	Pler	Nearstore Ofisikore	Other	 Begin assessment of structural stability 	C.) On-site salvage assessment	D.) Assessment of structural stability of half and horizon success.	A. I. Emerandor trading		C) External emergency transfer operations	D.) Emergency lightering	c.) Other removing methods F.) Making temporary repairs	G) Diving services support	 A.) Special salvage operations plan 	 B.) Subsurface product removal 	C.) Heavy Lift	A Plann		A.) External trenginting teams	AND BEEREN SASTELLE
D1 - Sector Boston	23-May	ECM-TTX-Silver Cruises SILVER SHADOW - Passenger Vessel (Remote Participation)	1	1		1 1	:	1		1				1 1											
D1 - Sector Boston	02-Nov	USCG Area Committee Meeting (Remote Participation)	1	1		1	:	1																	
D5 - Sector Delaware Bay	30-Aug	USCG MFF Subcommittee Hot-Wash YNOT-6 Barge Fire (Remote Participation)	1	1	1	1	:	1																	
D7 - Sector Miami	30-Mar	WO TTX Seabulk (Remote Participation)	1	1		1	1	1																	
D7 - Sector Miami	25-Oct	SE Florida Area Committee (In-Person)	1	1					1																
D7 - Sector Miami	30-Nov	USCG SMFF Preparedness (In-Person)	1	1		1																			
D7 - Sector Charleston	31-Mar	Big M Casino TTX Mass Rescue Operation (In-Person)	1	1		1	1	1		1 1	1	1	1	1 1			1	1	1						
D7 - Sector Charleston	14-Dec	USCG Full Blown SMFF Response (In-Person)	1	1	1	1	1	1 1		1 1	1	1	1	1 1	1	1	1 1	1	1	1	1	1	1	1	1
D8 - Houston/ Galveston	19-May	ECM-PG Shipmanagement MV PACIFIC INEOS BELSTAFF (Remote Participation)	1	1		1		1		1	1	1	1	1 1			1	1							
D8 - Houston/ Galveston	19-Sept	Hudson-Stolt Tankers MT EXERCISE LOYALTY, 38,4989 DWT In-Person (Holland) and Remote (Houston)	1	1		1	:	1		1 1	1	1	1	1 1			1 1	1							
D8 - Houston/ Galveston	16-Oct	ECM-K Marine MT ENSHU MARU (Remote Participation)	1	1		1	-	1		1 1	1	1	1	1 1			1	1				1	1	1	1
D8 - Houston/ Galveston	05-Dec	ECM-Synergas S.r.l. MV SYN ANTARES (Remote Participation)	1	1		1	-	1		1 1	1			1											
DS - Houston/ Galveston	13-Dec	USCG Round Table - Salvage Interest (In-Person)	1	1	1																				
D8 - Houston/ Galveston	14-Dec	WO TTX Latsco Marine MT HELLAS FOS (Remote Participation)	1	1		1		1		1				1				1							
D8 - Corpus Christi	22-5ep	ECM-Gascocean MT LNG ENDEAVOUR (Remote Participation)	1	1		1	:	1		1 1	1	1	1	1 1			1	1				1	1	1	1
D11 - San Francisco	26-Oct	USCG Marine Transportation System Recovery (Remote Participation)	1	1		1			1																
D11 - San Francisco	15-Dec	NJR-Starlight Marine (AmNav) (Remote Participation)	1	1	1	1	1			1	1		1				1 1								
D13 - Puget Sound	08 Dec - 15 Dec	USCG - SMFF Verification VPR 86881 MV MARINE BRIGHT	1	1	1		1	1									1 1								
D17 - Anchorage	15-Nov	ECM-Delmare (Remote Participation)	1	1		1	-	1 1		1 1	1	1	1	1 1			1	1				1	1	1	1
ECM Annual Large Scale IMT	09-Mar	ECM Annual Large Scale IMT Virginia, Beach (In-Person)	1	1		1	:	1 1		1 1	1	1	1	1 1			1	1	1						
GMS Annual North American Focus Training & Regulatory Seminar	21-Jul	GMS Annual North American Focus Training & Regulatory Seminar (In-Person)	1	1		1		1 1		1 1	1			1 1	1		1 1		1	1	1	1		1	1
		DRILLS / QI-TTX / USCG VERIFICATIONS 2022	21	0 20 1						13 9		9 1	10 1	2 10	2		6 1	0 10	4	2	2		5		5
		TOTALS	21	14 21 14	50	1 18 10	12 2	47	2		90					83				11		18		16	ſ



Combined Mapping of 2022 Actual Responses + Drills, TTX's and USCG Verifications + US Navy Supervisor of Salvage and Diving (SUBSALV)

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 Rate	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

Remote TTX Participation

Remote TTX Participation:

Personnel Type

OPA-90 Alliance

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	

rravel 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.

Unannounced

Announced

Attestation and Certification

Date: December 22, 2022

Dear Valued Donjon-SMIT & Donjon-SMIT Americas Clients,



I, Guillermo Hernandez of Donjon-SMIT, LLC & Donjon-SMIT Americas, 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 2022. 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, Donjon-SMIT and/or Donjon-SMIT Americas 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 or Donjon-SMIT Americas, LLC as their OPA-90 SMFF provider, for the year 2022, 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,

Guillermo Hernandez OPA-90 Program Manager

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