

May 2012



**The Britannia Steam Ship
Insurance Association Limited**

Managers
Tindall Riley (Britannia) Limited
Regis House
45 King William Street
London EC4R 9AN

Tel +44 (0)20 7407 3588
Fax +44 (0)20 7403 3942
www.britanniapandi.com

Circular

TO ALL MEMBERS

Dear Sirs

New requirements affecting oil tank vessel owners and owners of vessels carrying oil as "secondary cargo"¹ operating in certain areas of Western Alaska when going to or from a port in the United States

As from 14 May 2012 the United States Coast Guard (USCG) will require compliance with new Alternative Planning Criteria (APC) for certain vessels operating in Western Alaska.

Historically it has not been possible for tank vessel owners operating in Western Alaska carrying oil to comply fully with the vessel response planning requirements of the Oil Pollution Act 1990 and the USCG allowed waivers of the regulations (see USCG letter of 12 August 2009 attached). In 2010 the USCG announced that shipowners would be required to fully comply with the Regulations or adhere to approved Alternative Planning Criteria. In May 2011 the Alaska Marine Exchange published proposals for new Alternative Planning Criteria (<http://www.ak-mprn.org/pdfs/WA-APC-T-2011.pdf>). The criteria have now been finalised. Oil tank vessel owners and owners of vessels carrying oil as secondary cargo in certain areas of Western Alaska while going to or from a port in the United States, will be required to comply with the new requirements with effect from 14 May 2012. These areas are the areas of Western Alaska outside Cook Inlet and Prince William Sound regions and within 200 miles of the US coastline. (See link above).

¹ Oil as defined under OPA'90 carried in bulk as non-primary cargo on any type of vessel, i.e. oil intended for carriage as cargo from one port to another for reward, not for use onboard the vessel for its own machinery.

The new requirements

In order to meet the new requirements shipowners will be required to obtain a Certificate of Participation from Alaska Maritime Prevention and Response Network and to contract with the OSRO, Alaska Chadux. This evidence should be included in the relevant Vessel Response Plan. A copy of the AMPRN Network Subscription Form is attached.

Alaska Maritime Prevention and Response Network (AMPRN)

AMPRN was established to administer the operational and equipment procurement requirements of the APC. Full details of how to obtain a Certificate of Participation are to be found on the AMPRN website (www.ak-mprn.org). The fees charged by AMPRN are USD 6,000 per vessel per calendar year for oil tank vessels and USD 1,800 per vessel per calendar year for vessels carrying oil as a secondary cargo.

Alaska Chadux

A copy of the Alaska Chadux contract can be obtained from Mr. J Allen (jallen@chadux.com). However, Members should note that the contract does not comply with International Group (IG) guidelines on Vessel Response Plans and therefore the liabilities under the contract are not fully covered under standard P&I insurance. For the IG guidelines see Britannia Circular dated 16 June 2009. It is possible for Members to gain access to additional cover in the market. Those wishing for such cover are advised to contact the Managers.

The USCG has published FAQs (a set of Frequently Asked Questions) which can be seen via the following link: (<http://homeport.uscg.mil/anchorage>). These are also attached for ease of reference.

Please note that it is only necessary for owners to enrol with AMPRN when their existing Interim Operating Authorisation (IOA) obtained from the USCG headquarters expires.

Yours faithfully
For Tindall Riley (Britannia) Limited
Managers

Attachment 1 – USCG Letter
Attachment 2 – AMPRN form
Attachment 3 – USCG FAQs

This circular should not be placed in the Binder



16711
CG-543 Policy Letter
09-02

AUG 12 2009

From: ERIC P. CHRISTENSEN, CAPT
COMDT (CG-543)

A handwritten signature in black ink, appearing to read "Eric P. Christensen".

To: Distribution

Subj: INDUSTRY GUIDELINES FOR REQUESTING ALTERNATE PLANNING CRITERIA
APPROVAL, ONE TIME WAIVERS AND INTERIM OPERATING AUTHORIZATION

Ref: (a) 33 CFR 155.1065, 33 CFR 155.1025
(b) Guidelines for Implementation and Enforcement of Vessel Response Plans, Facility
Response Plans, and Shipboard Oil Pollution Emergency Plans,
COMDTINST 16450.32a
(c) Marine Safety Manual, Volume IX; Chapter 4, COMDTINST M16000.14

1. Purpose. The enclosure to this letter provides procedures that the maritime industry should follow when applying for alternate planning criteria in accordance with 33 CFR 155.1065. Sector Commanders/Captain of the Port (COTP) should also become familiar with this policy to ensure Coast Guard wide consistent application of the review, approval and enforcement procedures for vessel response plans.
2. Action. Sector Commanders/COTPs should bring this policy to the attention of appropriate individuals in the marine industry.
3. Directives Affected. This policy will be incorporated into the next revision of reference (b).
4. Background. Several areas under U.S. jurisdiction do not have sufficient resources to meet the national planning criteria as described in Appendix B to 33 CFR Part 155. In remote areas, where response resources are not available, or the available commercial resources do not meet the national planning criteria, the owner or operator may request acceptance of alternative planning criteria by the Coast Guard.

Reference (a) lists requirements for vessel owners and operators to follow if they believe that the national planning criteria contained elsewhere in 33 CFR Part 155 are inappropriate for a vessel in areas it is intended to operate. This guidance amplifies policy provided in references (b) and (c) and provides updated information to vessel owners and operators on submitting alternative planning criteria requests.

Sector Commanders/COTPs are reminded that vessel response plans can be approved by CG-5431 using a lesser standard than what is required per 33 CFR 155 Subpart D. When reviewing and endorsing alternative planning criteria requests, Sector Commanders/COTP should ensure the submission identifies prevention measures that are above and beyond existing requirements that would mitigate the risk of a spill proportionate to the limited maximum available response resources in the remote area of operation.

Subj: INDUSTRY GUIDELINES FOR REQUESTING ALTERNATE
PLANNING CRITERIA APPROVAL, ONE TIME WAIVERS AND
INTERIM OPERATING AUTHORIZATION

16711

5. Guidance. The enclosure contains guidance for:

- a. Submitting Alternate Planning Criteria Requests
- b. Requesting a One-Time Port Waiver
- c. Requesting Interim Operating Authorization

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Enclosure (1): Procedures for Requesting Alternate Planning Criteria Approval, One Time
Waivers and Interim Operating Authorizations

Distribution: All FORCECOM/OPCOM/Area/District (dp) offices
All Sectors/MSUs/MSDs

PROCEDURES FOR REQUESTING ALTERNATE PLANNING CRITERIA APPROVAL,
ONE TIME WAIVERS AND INTERIM OPERATING AUTHORIZATIONS

1. Application. 33 CFR 155 subpart D applies to each vessel that is constructed or adapted to carry, or that carries, oil in bulk as cargo or oil cargo residue, and that: (a) Is a vessel of the United States; (b) Operates on the navigable waters of the United States; or (c) transfers oil in a port or place subject to the jurisdiction of the United States. When the national planning criteria contained in 33 CFR Part 155 cannot be met, the owner or operator of a vessel may request acceptance of alternative planning criteria in accordance with 33 CFR 155.1065.

2. Submission of Alternate Planning Criteria Requests. Vessel owners/operators are required to submit an alternative planning criteria request to the cognizant Sector Commander/COTP 90 days before the vessel intends to operate under a proposed alternative planning criteria plan. If there is insufficient time for the Coast Guard to review an alternative planning criteria request prior to the vessel conducting operations in a COTP Zone, the vessel owner/operator may request that the Coast Guard issue an Interim Operating Authorization (IOA). The Coast Guard may issue an IOA for a temporary period of time, as long as the vessel owner/operator has submitted an alternate planning criteria request to the cognizant COTP.

a. In crafting an endorsement for an alternative planning criteria request, the COTP should reference the response resource inventory (RRI) for information regarding the status of response equipment available in the COTP zone. In addition, the COTP should consider any basic ordering agreements (BOA) that may be in place with pollution response contractors. The COTP should also seek input regarding available response resources from the regional response team, area contingency plan committee members, district response advisory team and other port stakeholders.

b. The COTP should verify the vessel's owner/operator has ensured that the maximum level of response resources are available by contract or other approved means. 33 CFR 155.1020 provides a definition for contract or other approved means. It should be noted that if a vessel chooses to use a per voyage contract with an OSRO, the vessel response plan approval for that zone will be issued only for the duration of the per voyage contract.

c. Upon completion of the review, the COTP should endorse the alternative planning criteria request and forward it to their cognizant district staff. The district staff should then endorse the request and forward it to CG-5431 providing at least 45 days for final review. CG-5431 will review the request and if approved, issue a vessel response plan approval letter.

d. The alternative planning criteria request must detail all the response plan elements where deviations from the requirements are proposed or cannot be met. Response equipment, techniques, or procedures identified in the alternative planning criteria request should be submitted in accordance with the evaluation criteria of Appendix B, 33 CFR 155. A gap analysis should be provided to the Coast Guard indicating how the available resources do not meet the national planning criteria, and how an alternate plan addresses shortfalls. This information can be determined using the Planning Volume Calculation MS excel spreadsheet available at <https://homeport.uscg.mil/vrp>. The OSRO Classification Standards are available at

ENCLOSURE(1)

PROCEDURES FOR REQUESTING ALTERNATE PLANNING CRITERIA APPROVAL,
ONE TIME WAIVERS AND INTERIM OPERATING AUTHORIZATIONS

<http://www.uscg.mil/hq/nsfweb/nsfcc/> and the OSRO Classification Matrix is available at <https://cgrri.uscg.mil/rriadmin/reports/webclassificationreport.aspx> or via the MISLE database under standard reports- Response Resource Inventory for USCG users. The request should contain at a minimum:

- (1) The reason and supporting information for the alternative planning criteria request;
- (2) Identification of specific regulations from which the owner/operator seeks an exemption and which alternative planning criteria would apply;
- (3) Proposals for alternative procedures, methods, or equipment standards, where applicable, to provide for an equivalent level of planning, response, and pollution mitigation strategies;
- (4) Prevention and mitigation strategies that ensure low risk of spills and adequate response measures as a result of the alternative planning criteria;
- (5) Consideration of special measures to the environmentally sensitive areas listed in the respective area contingency plans; and
- (6) Economic impact.

3. Area Contingency Plans. As a means to enhance transparency of alternate planning criteria standards, the COTP and Area Planning Committee may add pre-endorsed alternative planning criteria to the Area Contingency Plan.

4. Vessel Operations While Alternate Planning Criteria Submission is Reviewed. The Coast Guard recognizes that submitting alternate planning criteria 90 days in advance of operating in a COTP zone may not be feasible in all situations. Therefore, the following options are available to vessel owners/operators to manage an interim solution.

a. One-Time Waiver. When a vessel comes to a COTP zone for the first time, the vessel owner or operator can request a one-time waiver from the COTP in accordance with 33 CFR 155.1025(e). Meeting all the requirements does not in itself guarantee that the waiver will be issued; the COTP has the final decision authority. If the vessel desires to return to that COTP zone, the COTP is not authorized to issue an additional one time waiver. The vessel must have an approved vessel response plan (VRP) for that COTP zone or request an Interim Operation Authorization (IOA).

- (1) Tank vessels are authorized a one-time port waiver if all the following requirements are met:
 - A. Owner or operator has a valid VRP or Shipboard Oil Pollution Emergency Plan (SOPEP);
 - B. The plan is onboard the vessel;
 - C. A Qualified Individual (QI) has been identified to the master of the vessel; and
 - D. The owner or operator has identified through a contract or other approved means the private resources necessary to respond to the maximum extent practicable or a worst case discharge from the vessel in that zone.

PROCEDURES FOR REQUESTING ALTERNATE PLANNING CRITERIA APPROVAL,
ONE TIME WAIVERS AND INTERIM OPERATING AUTHORIZATIONS

b. Interim Operating Authorization (IOA). If the vessel owner/operator has submitted an alternative planning criteria request but there is insufficient time for the Coast Guard to complete a review of the request before the vessel plans to conduct operations in the COTP zone, the owner/operator can request the issuance of an IOA. 33 CFR 155.1025(c)(1) allows a vessel to handle, store, transport, or lighter oil after the submission of a response plan pending approval of that plan, if the vessel owner or operator has received written authorization for continued operations from the Coast Guard. The Coast Guard may issue an IOA for a temporary period of time as long as the owner/operator has submitted an alternate planning criteria request to the Coast Guard.

c. Requesting an IOA. To receive a Coast Guard IOA, the vessel's owner/operator must certify in writing to the Coast Guard that they have identified and ensured the availability of, through contract or other approved means, the necessary private resources to respond, to the maximum extent practicable, to a worst case discharge or substantial threat of such a discharge from their vessel as described in 33 CFR Sec. 155.1050, 155.1052, 155.1230, or 155.2230, as appropriate.

5. Examples. Enclosed are requests for VRP:

- a. One Time Waiver Request
- b. Interim Operating Authorization (IOA) Request
- c. Alternate Planning Criteria Request with Gap Analysis

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PROCEDURES FOR REQUESTING ALTERNATE PLANNING CRITERIA APPROVAL,
ONE TIME WAIVERS AND INTERIM OPERATING AUTHORIZATIONS

Example: One Time Waiver Request (33 CFR 155.1025(e))

Dear Captain Coastie,

I certify that:

- (1) I have (an approved response plan meeting the requirements of this subpart except for the applicable geographic specific appendix) or (a shipboard oil pollution emergency plan approved by the flag state)*
- (2) The approved response plan or the required plan section(s) is/are aboard the vessel;*
- (3) The designated qualified individual is: QI John Smith he can be reached at (800)888-8888; the vessel master has also been notified of the QI.*
- (4) The OSRO ensured, through contract or other approved means, to meet the criteria in Sec. 155.1050, 155.1052, 155.1230, or 155.2230, as appropriate, to a worst case discharge or substantial threat of discharge from the vessel is XXXX OSRO.*

Sincerely,

Owner/Operator or designated company representative

PROCEDURES FOR REQUESTING ALTERNATE PLANNING CRITERIA APPROVAL,
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Example: Interim Operating Authorization Request (33 CFR 155.1025(c))

Dear Captain Coastie,

The T/V NO SPILL IMO #999999 (VRP control # 99999), will be calling the COTP zone [Enter COTP Zone] on [DATE]. I request this interim operation authorization through (Date 90 days later).

I have identified and ensured the availability of, through contract or other approved means, the necessary private response resources to respond, to the maximum extent practicable, to a worst case discharge or substantial threat of such a discharge from my vessel(s) as described in title 33 Code of Federal Regulations Sec. 155.1050, 155.1052, 155.1230, or 155.2230, as appropriate. I have submitted an Alternate Planning Criteria Request in accordance with 33 CFR 155.1065(f).

Sincerely,

Owner/Operator or designated company representative

PROCEDURES FOR REQUESTING ALTERNATE PLANNING CRITERIA APPROVAL,
ONE TIME WAIVERS AND INTERIM OPERATING AUTHORIZATIONS

Example: Alternative Planning Criteria Request with Gap Analysis (33 CFR 155.1065 (f))

Dear Captain Coastie,

I am submitting a letter to Commandant (CG-5431) in accordance with 33 CFR 155.1065(f) and 33 CFR 155.1070 (c) (2) requesting that the Western Alaska COTP zone be added as an approved area for the OPA 90 Tank Vessel Response Plan (TVRP) (PLAN #). I am also requesting an interim operating authorization while this alternative planning criteria request is being considered. This TVRP was prepared by (my plan preparer) on behalf of our client, (Shipping Company X) The vessel(s) covered by the plan and included in this request are:

Vessel: IMO No.

- 1. T/V NO SPILL (IMO #)*
- 2. T/V NEVER SPILL (IMO #)*

Please acknowledge receipt of this request and in accordance with 33 CFR 155.1065 (f) I request a positive endorsement from Sector Western Alaska before the zone authorization amendment will be approved by Coast Guard Headquarters. These vessels will transit your zone on (Date).

We trust that the above proposed criteria will meet your requirements for positive recommendation. If you or your staff should have any questions regarding this matter or suggestions for other response measures to be taken for these transit, please call me at any time.

I have identified and ensured the availability of, through contract or other approved means, the necessary private response resources to respond, to the maximum extent practicable, to a worst case discharge or substantial threat of such a discharge from my vessel(s) as described in title 33 Code of Federal Regulations Sec. 155.1050, 155.1052, 155.1230, or 155.2230, as appropriate.

Sincerely,

Owner/Operator or designated company representative

*Enclosure (1) Proof of OSRO coverage (no example provided)
(2) Gap Analysis*

**PROCEDURES FOR REQUESTING ALTERNATE PLANNING CRITERIA APPROVAL,
ONE TIME WAIVERS AND INTERIM OPERATING AUTHORIZATIONS**

Example: Gap Analysis for Alternate Planning Criteria Request

(1) Reason and supporting information for the alternative planning criteria request:

I intend to conduct operations or transit COTP Western Alaska. I cannot meet the requirements of 33 Code of Federal Regulations Sec. 155.1050 due to unavailability of commercial resources which meet the national planning standards.

(2) Identification of specific regulations from which the owner/operator seeks an exemption and which alternative planning criteria would apply;

Example is based on 33 CFR 155 appendix B 7.4 (oil is type IV .96 specific gravity):

Plan #:	99999	Largest Vessel Name	T/V NEVER SPILL									
Planning Volume Calculations for a Worst Case Discharge												
Enter Cargo Capacity in bbl in Cell C4:												
100000												
On Water Planning Volumes (bbl)												
Oil Group	River	Nearshore / GL	Offshore	Open Ocean								
I	10,000	20000	0	0								
II	27,000	90000	45,000	18,000								
III	30,000	100000	80,000	40,000								
IV	28,000	70000	56,000	28,000								
Required Resources: On-Water Recovery (bbl)												
	River	Inland/Nearshore/Great Lakes			Offshore	Open Ocean						
Oil Group	Tier 1	Tier 2	Tier 3	Tier 1	Tier 2	Tier 3	Tier 1	Tier 2	Tier 3	Tier 1	Tier 2	Tier 3
I	3,000	4000	6,000	3,000	5,000	8,000	0	0	0	0	0	0
II	8,100	10800	16,200	13,500	22,500	36,000	4,500	7,425	9,450	1,080	1,800	2,160
III	9,000	12000	18,000	15,000	25,000	40,000	8,000	13,200	16,800	2,400	4,000	4,800
IV	8,400	11200	16,800	10,500	17,500	28,000	5,600	9,240	11,760	1,680	2,800	3,360

My plan lacks the requisite ability to have the effective daily recovery capacity indicated for type IV oil above. The applicable requirement is outlined in Sec. 155.1050, 155.1052, 155.1230, or 155.2230, as appropriate.

- Based on the above requirements necessary resources equal:*
- Rivers - Tier 3 + twice the cap = WCD 3 OSRO + twice the cap*
 - Inland - Tier 3= WCD 3 OSRO*
 - Nearshore - Tier 3= WCD 3 OSRO*
 - Offshore - Tier 1= WCD 1 OSRO*
 - Open Ocean - Tier 1= WCD 1 OSRO*

PROCEDURES FOR REQUESTING ALTERNATE PLANNING CRITERIA APPROVAL,
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My OSRO RDA Super Clean Corporation does not meet this standard as indicated in the chart below excerpted from the National Strike Force Coordination Center's (NSFCC) OSRO classification tables.

(3) Proposals for alternative procedures, methods, or equipment standards, where applicable, to provide for an equivalent level of planning, response, or pollution mitigation strategies:

I have secured the maximum commercial response resources in the area through a contract with [RDA Super Clean Corporation]. A copy of that contract is attached. This OSRO currently has the following capability excerpted from the RRI database which shows the resource gap:

	<i>OSRO Name:</i>			
	<i>RDA Super Clean Corporation - OSRO Number: 93</i>			
	<i>Vessel MMPD</i>	<i>Vessel WCD1</i>	<i>Vessel WCD2</i>	<i>Vessel WCD3</i>
<i>River or Canal</i>	<i>Yes</i>	<i>No</i>	<i>Yes</i>	<i>No</i>
<i>Inland</i>	<i>Yes</i>	<i>Yes</i>	<i>Yes</i>	<i>Yes</i>
<i>Nearshore</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>
<i>Offshore</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>
<i>Open Ocean</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>

(4) Prevention and mitigation strategies that ensure low risk of spills and adequate response measures as a result of the alternative planning criteria;

The following list of examples is neither inclusive nor exclusive:

Vessel(s) will:

Operate at a slower speed when within 12nm of the shoreline or any area where there are hazards to navigation

Call port during daylight hours only

Limit transfer operations to seas less than 3 feet

Engage a standby tug in the immediate location of the transfer operation

(5) Consideration of special measures to the environmentally sensitive areas listed in the respective area contingency plans.

The following extra measure(s) will be taken in addition to those measures above while operating in most environmentally sensitive areas (MESA) as outlined in the Alaska Unified Contingency Plan.

Pre-boom the vessel while conducting transfer operation with appropriate protective boom

(6) Economic impact

Specific loss of revenue is \$XXXX. This has been a port regularly called by vessel(s), summary of operational history.



ALASKA MARITIME
Prevention & Response Network

Network Subscription Form

Alternate Planning Criteria - Tank Vessels and Secondary Oil Cargo Carriers Operating in Western Alaska

Operator Particulars / Contact Information

Class of Vessel(s): Oil Tankers(s) Secondary Oil Cargo Carrier(s)

Vessel Owner / Operator

Vessel QI

Name: _____	Name: _____
Address: _____	Address: _____
_____	_____
E-mail: _____	E-mail: _____
Phone: _____	Phone: _____

VPR Administrator

Vessel Contact

Name: _____	Name: _____
Address: _____	Address: _____
_____	_____
E-mail: _____	E-mail: _____
24 hr Phone: _____	24 hr Phone: _____

Vessel's Name

IMO Number

Sat Phone #

1	_____	_____
2	_____	_____
3	_____	_____
4	_____	_____
5	_____	_____

Notification Options: Who does the operator want to be notified if covered Vessel departs from APC operational requirements?

Vessel Operator		Vessel QI		Vessel Master	
Yes	No	Yes	No	Yes	No

Please review and check the applicable boxes below. By doing so, the undersigned hereby acknowledges and affirms compliance with each statement.

I / we have read the Alternative Planning Criteria (APC) for oil tankers sailing in Western Alaska COTP Zone approved in Feb. 2012

I / we agree to be bound by the terms and conditions of the APC including routing, tracking, notice and OSRO relationship(s) as set forth in the APC.

I / we understand participation in the Network must be renewed and acknowledged on an annual basis.

I / we acknowledge operational compliance with the APC rests solely with the operator and vessel master and the Network acts only to facilitate compliance.

I / we affirm we are duly authorized to confirm our organizations' and their covered vessels' participation in the APC for oil tankers and secondary oil cargo carriers sailing in Western Alaska COTP Zone.

Signature: _____
Name: _____
Date: _____
Title: _____
Address: _____

24 hr phone: _____

Network Use Only:
Date Rec'd: _____
Completion Confirmed:
By: _____

Mail and fax the signed form to :
The "Network"
C/O Marine Exchange of Alaska
1000 Harbor Way, Suite 204
Juneau, Ak 99801
Fax: 800-783-0513

To contact the Network:
Ph: 907 463 3064 (24 hr) or
E-mail: enrollment@ak-mprn.org
Inquires: edpage@ak-mprn.org

Fees and Payment

Fees per vessel, per calendar year for obtaining a "Certificate of Participation" in the Network are as follows:

Tanker: \$6,000 per calendar year, 2012

Secondary Cargo Carrier: \$1,800 per calendar year, 2012

Note: add \$30 to vessel fee if wiring funds; see instructions below

Routing instructions for incoming wires are as follows:

Bank name: Wells Fargo Bank of Alaska
Address: 745 E. Dimond Blvd
Anchorage, AK 99515

Routing #: 125200057
Account #: 1508379243

Swift Code: WFBIUS6S

Wire fees are approximately \$30

Fees for membership or "Subscription" as applicable for required agreement with Western Alaska OSRO, Alaska Chadux, are paid separately to Alaska Chadux Corporation.

Western Alaska Tank Vessel APC FAQ's Sheet

1. What do I need to send to Coast Guard Headquarters in order to get an approved Geographic Specific Appendix for Western Alaska?

a. E-mail yrp@uscg.mil:

- Certificate of Participation from the Alaska Maritime Prevention & Response Network (the Network).
- OSRO contract/agreement or other approved means with Alaska Chadux Corporation

2. What exactly is acceptable for the following condition on page 10 of the APC:

“Prior to conducting a transfer to a vessel or facility the vessel will verify with the receiving facility that an oil spill recovery barge, containment boom, deployment vessel(s) and personnel are immediately available to be deployed in the event of an oil spill.”

Compliance with the above can be verified by:

- Mooring up and completing the transfer at a facility regulated under Title 33 Code of Federal Regulations Part 154; and
- Completing a Declaration of Inspection with the facility.
- Any lightering to another vessel will require prior approval by COTP Western Alaska as stated in Section 6(a).

3. How do I submit my notice of transit to enter COTP Western Alaska zone?

a. At least 96 hours prior to arrival in the Exclusive Economic Zone (EEZ; 200 miles offshore), e-mail Sector Anchorage at SectorAnchorageArrivals@uscg.mil and the Network at operations@ak-mprn.org the following information:

- Date and time of planned transit and port calls
- Planned north or south transit of the Aleutian Chain
- Vessel contact information

- Commitment to comply with WA-APC-T criteria

- b. COTP Western Alaska will accept notification by the Network on behalf of the vessel.

4. *Is this notice of transit different from the Advanced Notice of Arrival (ANOVA)?*

- a. Yes. This notice is provided advising the vessel will enter the COTP Western Alaska zone, and should be submitted 96 hours prior to entering the EEZ, even if the vessel is not making a port call within COTP zone Western Alaska. Vessels making a port call shall still submit an ANOVA to the National Vessel Movement Center (NVMC) in accordance with 33 CFR 160, Subpart C.

5. *If my vessel is making a port call in COTP zone Western Alaska and has submitted an ANOVA to the NVMC is a notice of transit still required?*

- a. Yes, the notice of transit is critical to ensure proper tracking of vessels covered under this APC.

6. *Are there any additional notifications I need to make?*

- a. Yes. The following circumstances require additional notifications to the COTP Western Alaska:
 - Deviations from the reduced risk routes identified in WA-APC-T should be made to COTP Western Alaska by calling the Sector Anchorage Command Center, (907) 271-6700 or via e-mail to SectorAnchorage@uscg.mil. This notification should be made prior to deviating from the approved route in the APC.
 - Any vessel wanting to conduct offshore lightering operations needs to submit a Lightering Plan to SectorAnchorageArrivals@uscg.mil for approval at least 48 hours in advance to lightering operations.
 - Any marine casualty or hazardous condition needs to be reported immediately to COTP Western Alaska by calling the Sector Anchorage Command Center, (907) 271-6700. Initial notification via email is not acceptable.

7. I already have an Interim Operating Authorization (IOA) from Coast Guard Headquarters is that still valid?

- a. Yes. All IOA's issued by Coast Guard Headquarters are still valid until their current expiration.

8. What are the future plans for WA-APC-T?

- a. Within 6 months, the Network will provide a status update to COTP Western Alaska and the Alaska Department of Environmental Conservation, as well as a 5 year "build out" plan.
- b. Within 6 months, there will be an implementation of a Vessel Traffic Management System (VTMS). This VTMS will be used in monitoring vessels' routes, notifying the Coast Guard of any unauthorized deviations. Deviations without required notifications will be considered for Enforcement action.

9. What is considered a suitable escort towing vessel as stated on Page 10 of the APC?

- a. Depending on the location of the transfer, a suitable towing vessel is one normally used during mooring operations in the port in which you are transferring, i.e. Dutch Harbor. A separate towing vessel is not required to be contracted with if one is not currently located in the port to which the vessel is heading.

10. Are foreign tank vessel's operating solely in Cook Inlet required to comply with this APC?

- a. No, tank vessels operating solely in Cook Inlet are required to obtain a CISPRI contract for the duration of their voyage and submit their CISPRI contract, along with their VRP to the vrp@uscg.mil email at CG Headquarters where they will be given a GSA approval for the duration of their voyage for Cook Inlet only.
- b. Vessels must remain within the approved CISPRI route per their contract. Vessels wishing to operate outside the approved CISPRI route must obtain a Certificate of Participation from the Alaska Maritime Prevention & Response Network and a Chadux contract.

11. Can operators comply with the following provision in the APC: "access to Tier 3 offshore, open ocean and nearshore response capabilities from out of region when these capabilities are not available in the area of coverage."

- a. Yes, the Alaska Maritime Prevention & Response Network has provided the Coast Guard with verification this provision can be met.