



**TITAN  
SALVAGE**  
A CROWLEY COMPANY

WORLDWIDE  
**MARINE SALVAGE AND  
WRECK REMOVAL**





# **OPA 90: Marine Salvage & Fire Fighting Regulations**

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For IMCC, Dublin 2011**



CROWLEY

- **New OPA 90 tank vessel salvage regulations effective 22 February 2011,**
- **These regulations have been in development since 1991. MSFF set Dec 2008.**
- **Additional requirements directly affect:**
  - **Salvor**
  - **Vessel owner/operators**
  - **Contractual issues**

## USCG Salvage and Marine Firefighting Requirements



- Planning timeframes for response
  - It provides criteria for determining adequacy of the salvage and marine firefighting resources.

# Rescue Towing



# Salvage



# Lightering



# Firefighting







- **Four primary areas to assess**
  - **Salvor qualifications**
  - **Response time planning standards**
  - **VRP additions**
  - **Contractual Issues**

## Salvor Qualifications: 15 Pre-requisites

- **Environmental sensitivity**
- **Resources**
- **Highly-trained personnel**
- **Financial Strength**
- **Established track record**
- **Experience**

VESSEL OWNER CERTIFIES CAPABILITY

- Resource provider is currently working in response service needed.
- Resource provider has documented history of participation in successful salvage and/or marine firefighting operations, including equipment deployment.
- Resource provider owns or has contracts for equipment needed to perform response services.
- Resource provider has personnel with documented training certification and degree experience (Naval Architecture, Fire Science, etc.).
- Resource provider has 24-hour availability of personnel and equipment, and history of response times compatible with the time requirements in the regulation.
- Resource provider has on-going continuous training program. For marine firefighting providers, they meet the training guidelines in NFPA 1001, 1005, 1021, 1405 and 1561.
- Resource provider has successful record of participation in drills and exercises.
- Resource provider has salvage or marine firefighting plans used and approved during real incidents.
- Resource provider has membership in relevant national and/or international organizations.
- Resource provider has insurance that covers the salvage and/or marine firefighting services which they intend to provide.
- Resource provider has sufficient up front capital to support an operation.
- Resource provider has equipment and experience to work in the specific regional geographic environment(s) that the vessel operates in (e.g., bottom type, water turbidity, water depth, sea state and temperature extremes).
- Resource provider has the logistical and transportation support capability required to sustain operations for extended periods of time in arduous sea states and conditions.
- Resource provider has the capability to implement the necessary engineering, administrative, and personal protective equipment controls to safeguard the health and safety of their workers when providing salvage and marine firefighting services.
- Resource provider has familiarity with the salvage and marine firefighting protocol contained in the local ACPs for each COTP area for which they are contracted.



## The Core Four: USCG approved

- MRA
- DonjonSMIT
- Resolve
- T&T Bisso

# Response Time Planning Standards

1. In Port
2. Nearshore – up to 12 NM
3. Offshore - greater than 12NM

These are **planning** standards.

## Response Time Planning Standards:

	Near shore /	Offshore
<b>Assessment</b>		
Remote Assessment	1 hour	1 hour
Stability Assessment, start	3 hours	3 hours
Hull & Bottom strength assessment	12 hours	18 hours
<b>Emergency Towing</b>	12 hours	18 hours
<b>Salvage Plan in place</b>	16 hours	22 hours
<b>Diving ops</b>	18 hours	24 hours

**Salvage:**

Special Salvage Operations : Nil                      18 hours                      24 hours

**Lightering:**

Remote assessment                      1 hour                      1 hour                      1 hour

**Fire Fighting:**

Remote Assessment                      1 hour                      1 hour                      1 hour

On-site Assessment                      2 hours                      6 hours                      12 hours

Fire suppression (teams)                      4 hours                      8 hours                      12 hours

Fire suppression (FiFi vessel)                      4 hours                      12 hours                      18 hours

# Marine Firefighting Pre-Planning



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**DEPARTMENT OF HOMELAND  
SECURITY**

**Coast Guard**

**33 CFR Part 155**

[Docket No. USCG-1998-3417]

RIN 1625-AA19 (Formerly RIN 2115-AF60)

**Salvage and Marine Firefighting  
Requirements; Vessel Response Plans  
for Oil**





## NATIONWIDE FOAM RESOURCES

***Identify the proper types and amount of extinguishing agent needed to combat a fire involving vessels cargo, other contents and super structure.***

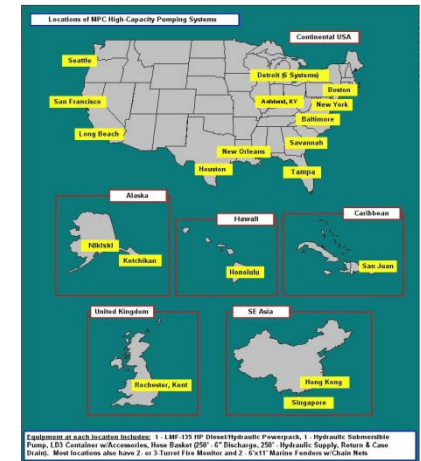
<u>Area</u>	<u>Fire Water</u>	<u>Foam (Gallons)</u>
Alaska	64,380 GPM	30,000 Gallons
East Coast	152,305 GPM	46,572 Gallons
Gulf Coast	216,150 GPM	171,800 Gallons
Hawaii	5,200 GPM	6,000 Gallons
Inland Rivers/ Great Lakes	7,500 GPM	Gulf Stocks
San Juan, Puerto Rico	10,500 GPM	6,000 Gallons
West Coast	48,300 GPM	73,100 Gallons
<b>Total</b>	<b>519,335 GPM</b>	<b>333,472 Gallons</b>

## EXTENSIVE EMERGENCY LIGHTERING INVENTORY

Identify the proper type and amount of transfer equipment to offload each vessel's largest tank in 24 hours of continuous operation.

<b><u>MRA Emergency Lightering Sets*</u></b>	
<b>Alaska</b>	<b>2 (Dedicated to the MRA)</b>
<b>West Coast</b>	<b>3(Dedicated to the MRA)</b>
<b>Hawaii</b>	<b>1(Dedicated to the MRA)</b>
<b>Gulf Coast</b>	<b>4(Dedicated to the MRA)</b>
<b>East Coast</b>	<b>8(Dedicated to the MRA)</b>
<b>Puerto Rico</b>	<b>1(Dedicated to the MRA)</b>
<b>Lake &amp; Rivers</b>	<b>6 (Dedicated to the MRA)</b>
<b>Total</b>	<b>22</b>

\*A lightering set consists of a 2500gpm Pump, 135hp Power Pack, Hose Basket with 250' 6" Hose, 250' Hydraulic Hose, 2 or 3 Fire Monitors per pump with Foam Nozzles and a 6' x 11' Marine Fenders with Chain Nets



## Access state of the art lightering and product recovery services

*MPC has developed a submerged oil recovery system using a manned submersible, which will permit safe, extended operations at increased depths.*



**Emergency Towing Network of Vessels**

**Salvage – Salvage Depot in North  
America**

**Emergency Lightering – Equipment  
accessible to all COTP Zones**

**Pre-Fire Planning**

**Fire Fighting Resources –network  
throughout the US.**



## MARINE RESPONSE ALLIANCE



## U.S. EQUIPMENT LOCATIONS



# FUNDING

- Funding agreement in place before any incident
- CG approval (hence the Core Four)
- Intention to avoid delays
- Initial misunderstanding and reluctance for LOF

## UNIQUE CONTRACT AND FUNDING AGREEMENT

**The MRA contract includes a written funding agreement that ensures responses are not delayed due to any contract negotiations and has been vetted by the USCG and the International Group of P&I Clubs**

### Contract and Funding Agreement

The agreement must be by contract (or other approved means). The contract should expressly provide that the resource provider (Salvor) is capable of, and intends to commit to, meeting the plan requirements. As part of the contract the owners must enter into a written funding agreement. The purpose of a funding agreement is to ensure that salvage and marine firefighting responses are not delayed due to funding negotiations at the time of an incident. The funding agreement must include a statement of how long the agreement remains in effect, and must be provided to the US Coast Guard for YRP approval. The USCG has indicated that it will accept Lloyd's Open Form (LOF) with certain conditions (see Annex 1). In effect this would seem to amount to LOF plus SCOPIC.

Although not primarily a matter relating to P&I cover, the International Group (IG) has drawn up a set of guidelines for evaluating these agreements and these are attached as Annex 3. These relate to such matters as indemnities, control, insurance etc. Against the background of these guidelines the VEP Working Group of the IG has reviewed four Salvor agreements namely those of:

- DeepoChart - Version 7 June 2010
- MRA - Marine Response Alliance, LLC Dated 2 August 2010
- Resolve - Dated 14 June 2010
- T&T Bisco - OPA 90 Ship Agreement Non-US - 21 April 2010
- T&T Bisco - OPA 90 Ship Agreement US Owners - 15 June 2010

We can confirm that these agreements conform with the guidelines. These salvors have also informed the VEP Working Group that the USCG has reviewed their agreements and stated that they meet the funding agreement requirements. The Salvors have been provided with letters from the USCG to this effect.



# OPA 90 Regulations

- In force for “Tank-Vessels” from 22 February, 2011
- Non-tank Vessels ?









# Food for Thought

Other Areas? EU, China.....





# Questions?

**24** AVAILABLE  
HOURS  
A DAY

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