21 February 2011

Marine Advisory: 01/2011

Subj: USCG Enforcement of VRP Required Plan Amendments

Ref: (a) US 33 CFR Part 155
    (b) USCG NVIC 2-10

Dear Shipowner/Operator:

By 22 February 2011, tank vessel response plans required by the USCG must be updated to include Salvage and Marine Firefighting and Oil Spill Removal Equipment amendments. Tank vessel owners and operators must establish planning timeframes for response and provide criteria for determining resource providers. Contracts and funding agreements between vessels owner/operators and salvage and marine firefighting resource providers and, where applicable, contracts for dispersants and related delivery equipment, aerial tracking and trained observation personnel must be submitted with the amendments.

The USCG Office of Vessel Activities, CG-5431 (VRP PROGRAM) will issue an interim operating authorization letter for all Tank Vessel Response Plan updates that comply with the requirements. These will be replaced with a full VRP approval letter within 180 days after a comprehensive review of the plan is completed. To receive an IOA letter the update must include the identification of a Salvage and Marine Firefighting resource provider along with a contract and funding agreement. In addition, it must include an oil dispersant capability update with a contract and identification of response resources that meet the requirements contained in US 33 CFR 155 Subpart D.

The USCG has advised that vessels will be screened for compliance before arrival in the US and USCG personnel will confirm during inspections if the required VRP update has been submitted. If it is determined that a VRP update has not submitted the USCG intends to take appropriate action which may included restricting vessel operations or denying port entry. The USCG may also issue a notice of violation if the vessel is handling, storing or transporting oil on the navigable waters of the US. For additional information you can examine the requirements on the USCG web site at: https://homeport.uscg.mil/vrpexpress

Point of Contact
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