

Changing the Economics of Salvage: Vessel Response Plan Requirements in the United States

TANK VESSEL RESPONSE PLAN REQUIREMENTS

- 1989, *Exxon Valdez* spill
- 1990, U.S. Oil Prevention Act (“OPA”)
- February 1993, VRP required for all tank vessels operating in U.S.

SALVAGE & MARINE FIREFIGHTING (TANKERS)

- 1993 rule: “the identified resources must be capable of being deployed to the port nearest to the area that the vessel operates within 24 hours of notification”
- Compliance originally due 1998
- Extended to 2001, then 2004
- Special SMFF regulations proposed in 2002
- Final rule 2009; compliance deadline 2011

Salvage

TABLE 155.4030(b)—SALVAGE AND MARINE FIREFIGHTING SERVICES AND RESPONSE TIMEFRAMES

Service	Location of incident response activity timeframe	
	CONUS: nearshore area; inland waters; Great Lakes; and OCONUS: <or = 12 miles from COTP city (hours)	CONUS: offshore area; and OCONUS: <or = 50 miles from COTP city (hours)
(1) Salvage		
(i) <i>Assessment & Survey:</i>		
(A) Remote assessment and consultation	1	1
(B) Begin assessment of structural stability	3	3
(C) On-site salvage assessment	6	12
(D) Assessment of structural stability	12	18
(E) Hull and bottom survey	12	18
(ii) <i>Stabilization:</i>		
(A) Emergency towing	12	18
(B) Salvage plan	16	22
(C) External emergency transfer operations	18	24
(D) Emergency lightering	18	24
(E) Other refloating methods	18	24
(F) Making temporary repairs	18	24
(G) Diving services support	18	24
(iii) <i>Specialized Salvage Operations:</i>		
(A) Special salvage operations plan	18	24
(B) Subsurface product removal	72	84
(C) Heavy lift ¹	Estimated	Estimated

Marine Firefighting

(2) Marine firefighting	At pier (hours)	CONUS: Nearshore area; inland waters; Great Lakes; and OCONUS: <or = 12 miles from COTP city (hours)	CONUS: Offshore area; and OCONUS: <or = 50 miles from COTP city (hours)
(i) <i>Assessment & Planning:</i>			
(A) Remote assessment and consultation	1	1	1
(B) On-site fire assessment	2	6	12
(ii) <i>Fire Suppression:</i>			
(A) External firefighting teams	4	8	12
(B) External vessel firefighting systems	4	12	18

SMFF: NON-TANK VESSELS

- 2004, Coast Guard and Maritime Transportation Act extends VRP requirements to tanker
- 2009, proposed SMFF rulemaking for non-tank vessel
- 2013, rulemaking final
- October 13, 2013, all vessels subject to VRP requirement including SMFF planning