Salvage and Marine Firefighting Regulatory Framework

Jim Elliott, Vice President
T&T Salvage
Overview

Response Priorities

Best Response Model

OPA 90 / Marine Casualty Response

Salvage and Marine Firefighting Regulations

The Incident Command System

The SOSREP Model
“Safety of human life must be given the top priority during every response action.”

“Stabilizing the situation to preclude the event from worsening is the next priority. All efforts must be focused on saving a vessel that has been involved in a grounding, collision, fire, or explosion, so that it does not compound the problem.”

“Defensive actions shall begin as soon as possible to prevent, minimize, or mitigate threat(s) to public health or welfare or the environment.”
Oil Pollution Act (OPA 90)

- Implemented February 1993
- Required Vessel Response Plans for Tank Vessels
- The following are named in each response plan:
  - Oil Spill Response Organization
  - Salvors
  - Firefighters
Oil Pollution Act (OPA 90)

• The responsible party for a vessel or facility from which oil is discharged, or which poses a substantial threat of a discharge, is liable for damages resulting from the discharged oil and for removal costs.

• Established Limits of Liability and requires evidence of Financial Responsibility.

• The Clean Water Act does not preempt State Law. States may impose additional liability (including unlimited liability), funding mechanisms, requirements for removal actions, and fines and penalties for responsible parties.

• Increased the fines, civil penalties and prison terms for failing to notify the appropriate Federal agency of a discharge.

• Established requirements for spill contingency plans for vessels and facilities.
<table>
<thead>
<tr>
<th>Goal</th>
<th>Key Business Drivers</th>
<th>Critical Success Factors</th>
</tr>
</thead>
</table>
| Best Response            | Human Health             | • No Passenger or Public Injuries  
• No Responder Injuries  
• Accurate/timely information provided |
|                          | Natural Environment      | • Source of discharge minimized  
• Source contained  
• Sensitive areas protected  
• Resource damage minimized |
|                          | Economy                  | • Economic impact minimized                                                        |
|                          | Public Communications    | • Positive media coverage  
• Positive public perception                                                        |
|                          | Stakeholder Support      | • Minimize impact  
• Stakeholders well informed  
• Positive meetings  
• Prompt handling of claims                                                      |
Salvage and Marine Firefighting Requirements

FOCUS ON RESOURCE AVAILABILITY

- Defines salvage and marine firefighting services and resources.
- Establishes planning timeframes for response.
- Provides criteria for determining resource provider adequacy.
<table>
<thead>
<tr>
<th>Service</th>
<th>Inland Waters Great Lakes Rivers &amp; Canals &lt; or = 12 miles</th>
<th>Offshore (&gt;12 to 50 miles)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Response Time In Hours</td>
<td>Response Time In Hours</td>
</tr>
<tr>
<td>Assessment &amp; Survey</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Remote assessment &amp; consultation</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>Begin Structural &amp; Stability Assessment</td>
<td>3</td>
<td>3</td>
</tr>
<tr>
<td>On-site salvage assessment</td>
<td>6</td>
<td>12</td>
</tr>
<tr>
<td>Assessment of Structural Stability</td>
<td>12</td>
<td>18</td>
</tr>
<tr>
<td>Underwater vessel and bottom survey</td>
<td>12</td>
<td>18</td>
</tr>
<tr>
<td>Stabilization</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Emergency Towing</td>
<td>12</td>
<td>18</td>
</tr>
<tr>
<td>Salvage Plan</td>
<td>16</td>
<td>22</td>
</tr>
<tr>
<td>Emergency transfer onboard using external pumps</td>
<td>18</td>
<td>24</td>
</tr>
<tr>
<td>Emergency lightering</td>
<td>18</td>
<td>24</td>
</tr>
<tr>
<td>Other refloating methods</td>
<td>18</td>
<td>24</td>
</tr>
<tr>
<td>Making temporary repairs</td>
<td>18</td>
<td>24</td>
</tr>
<tr>
<td>Diving services support</td>
<td>18</td>
<td>24</td>
</tr>
<tr>
<td>Specialized Salvage Operations</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Special Salvage Operations Plan</td>
<td>18 Estimated</td>
<td>24 Estimated</td>
</tr>
<tr>
<td>Heavy lift</td>
<td>72 Estimated</td>
<td></td>
</tr>
<tr>
<td>Subsurface product removal</td>
<td>72 Estimated</td>
<td></td>
</tr>
</tbody>
</table>
“The resource providers identified in a VRP should be immediately notified and, as appropriate, activated when a discharge of oil, or a substantial threat of such a discharge of oil, exists.”
Salvors and the Incident Command System

- Salvors are highly-specialized, contracted resources with valuable expertise during the emergency phase of a response.

- Decisions on salvage operations must be made quickly to mitigate the impact of an incident.

- Unified Command and/or Incident Commander may need direct communications with the salvage master in early stages of a grounding or collision.
Incident Action Planning

Operational Planning
INCIDENT BRIEFING

1. INCIDENT NAME
   SAS 1200

2. DATE PREPARED
   24 OCT 2006

3. TIME PREPARED
   4:25 PM

4. SKETCH MAP
   - Incident location
   - Incident Command Post
   - Hotspot
   - Staging Area

A private plane collided with a commercial airline causing the commercial airliner to crash into TMC. Fire has engulfed the Texas Heart Inst., M.D. Anderson Cancer Ctr., and Garage 2. Power is out in the southern half of TMC. Dozen of persons on the ground have been injured or killed. There are reports that people are trapped in nearby buildings. The private plane crashed in University Village.

5. PREPARED BY (NAME AND POSITION)
   B. Nelson (IC)  C. Mills (IC)  T. Wright (IC)

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Reactive

Proactive

Incident Briefing

Incident Action Plan
Objectives, Strategies, Tactics

- **Objectives**: Command’s desired outcome
  - *What* should be accomplished.
- **Strategies**: General plan or direction
  - *How* will the incident objectives be accomplished.
- **Tactics**: Specific work assignments
  - *Who* with *what* will execute the plan; and *when* and *where*. 
The Secretary of State Representative (SOSREP)

- One person to act as representative of the Secretary of State
- Free to act without recourse to higher authority
- Ultimate and decisive voice
- Can exercise ultimate control
- Tacitly approves all actions
- Free from political interference
- “Must be ‘backed or sacked’”
Operations Control Unit (OCU)

- Chaired by the SOSREP
- To establish all objectives and proposals
- Continue to monitor and evaluate operations and ascertain progress;
- Conduct containment / recovery plan approval;
- Consider risks, dangers, security if supply;
- Not a committee
Final Points

• Unified versus Single Command Model
• Consensus versus Best Technical Solution
• Shipping versus Offshore Industries
Salvage and Marine Firefighting Regulatory Framework

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