

**COMPLIANCE WITH FEDERAL (USCG) REQUIREMENTS IN GUAM AND CNMI**

<p>There are not sufficient oil spill response capabilities available to satisfy the national response planning standards in the remote geographic areas of Guam and the Commonwealth of the Northern Mariana Islands (CNMI) in the Guam COTP Zone. <i>Existing capabilities are verified on a regular basis by the USCG to determine whether APC will still be required. The result has been the issuance and extension of APC approvals for twelve (12) months at a time.</i></p> <p>Therefore, vessels (tank/nontank) calling, operating or transiting within 200 nm (US Exclusive Economic Zone - EEZ) of Guam and CNMI when <u>bound to or departing from a port or place in the US</u> must submit Alternate Planning Criteria (APC). <i>This APC must be pre-approved by the USCG.</i></p> <p>Vessel owner/operators may enroll in an existing approved APC or submit their own for approval.</p>		
<b>APC</b>	<p>1) Is your vessel calling Guam <b>or</b> 2) transiting the Guam COTP Zone when bound to or departing from a port or place in the US? YES <input type="checkbox"/> NO <input type="checkbox"/></p> <p>If <b>YES</b> then you require APC and must follow this checklist (see below). If <b>NO</b> then your vessel is on <i>innocent passage</i> and this checklist does <b>NOT</b> apply.</p>	
	<p>The USCG issued O'Brien's an approval for APC submitted January 28, 2014. This approved APC means that O'Brien's plan holders who have vessels operating in Guam and CNMI can obtain USCG VRP/NTVRP authorization for those operations without undue delay.</p> <p><i>The following actions are required for compliance with federal (USCG) requirements when operating in Guam and CNMI for both <b>TANK</b> and <b>NONTANK</b> vessels:</i></p>	
1	Obtain a contract with the local Oil Spill Removal Organization (OSRO): <b>OSROCO</b> ( <a href="mailto:info@osroco.com">info@osroco.com</a> , <a href="mailto:jam1@cabtug.com">jam1@cabtug.com</a> ) +1 671 477 1818   <b>24 hr:</b> +1 671 688 5038 ( <a href="http://www.cabramarine.com">www.cabramarine.com</a> , <a href="http://www.osroco.com">www.osroco.com</a> )	<input type="checkbox"/>
2	Provide a copy of the executed contract to your assigned O'Brien's Client Specialist for submission to USCG HQ.  This will allow us to request USCG HQ update and re-issue your Approval/IOA with authorization for the Guam COTP Zone.	<input type="checkbox"/>
3	Maintain a copy of the O'Brien's approved <a href="#">APC Authorization Letter</a> and APC Approval Letter on board the vessel with the VRP/NTVRP: <ul style="list-style-type: none"> <li>• <a href="#">Nontank APC Approval</a></li> <li>• <a href="#">Tank APC Approval</a></li> </ul> <i>Approvals currently extended through December 31, 2018.</i>	<input type="checkbox"/>
4	Ensure the vessel Master strictly adheres to the <i>Prevention and Mitigation Strategies</i> listed on page 2 of the approved APC (see below) when operating in the Guam COTP Zone.	<input type="checkbox"/>
<b>PREVENTION &amp; MITIGATION STRATEGIES</b>	Both TANK and NONTANK vessels authorized to operate in the Guam COTP Zone under the O'Brien's APC must strictly adhere to the following risk reduction measures:	
1	Immediately notify the local COTP of any change in vessel's ability to comply with the APC.	<input type="checkbox"/>
2	Vessel at the discretion of the Master will operate at a lower speed when within 12nm of the shoreline or any area where there are hazards to navigation if deemed appropriate for the conditions.	<input type="checkbox"/>
3	Call port during daylight hours only ( <i>at the discretion of the Guam COTP</i> ).	<input type="checkbox"/>
4	Limit fuel oil/crude oil/product transfer operations to daylight hours only ( <i>at the discretion of the Guam COTP</i> ) and seas less than 3 feet.	<input type="checkbox"/>
When operating in <b>environmentally sensitive areas</b> defined in the Area Contingency Plan the following additional measures will be required by the Guam COTP:		
1	Pre-boom the vessel while conducting fuel oil/crude oil/product transfer operations with appropriate protective boom	<input type="checkbox"/>
2	Engage a standby tug in the immediate location of the fuel/crude oil/product transfer operation.	<input type="checkbox"/>
3	Employ a minimum two tug escort ( <i>at the discretion of the Guam COTP</i> ).	<input type="checkbox"/>