Salvage and Marine Firefighting Table Top & Equipment Deployment Exercises

FOR YEAR 2018

Fulfillment of PREP Guideline Sections 3.11, 3.12, & 3.15.

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SALVAGE

SMIT

An OPA-90 Alliance

Contents

To Our Clients

Vessel Response in the United States and Worldwide

It has been another busy year in salvage response and news for Donjon, SMIT, and Donjon-SMIT.

As you may have heard, our commitment to our clients with salvage and marine firefighting services has been demonstrated again with the parent companies of Donjon-SMIT, LLC an OPA-90 Alliance, having collectively won the marine salvage contracts for all three zones for the U.S. Navy.

Both Donjon Marine and SMIT Salvage, have been awarded contracts to serve as the commercial marine salvage and engineering support contractor for the Naval Sea Systems Command (NAVSEA), the division of the U.S. Navy responsible for engineering, building, buying and maintaining Navy ships and submarines and their combat systems. Both Donjon and SMIT Salvage will provide the Navy with marine salvage, salvage-related towing, harbor clearance, ocean engineering and point-to-point towing services in the event of an emergency or incident globally for the U.S. Navy.

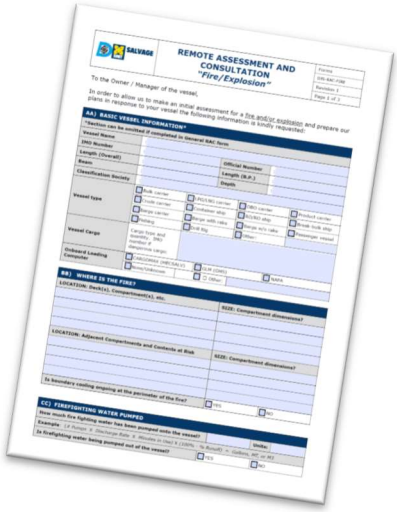
Donjon Marine was first awarded this contract for Zone A in 1980. SMIT Salvage has held their contract for Zone C for over 30 years, and now has won the contract for Zone B as well. This means that either Donjon or SMIT Salvage provides the U.S. Navy exclusive commercial marine salvage support worldwide.

Having the U.S. Navy entrust Donjon and SMIT Salvage with its worldwide salvage responsibilities is a great honor and requires the highest level of commitment. Donjon-SMIT's OPA-90 clients can be assured the same level of commitment and excellence in response.

As the leader in salvage response operations in the U.S. and around the world, we look forward to serving you in 2019. Please contact us anytime to assist with any situation that might arise in the new year.

National Preparedness for Response Exercise Program (PREP) 2016.1 Guideline Update (Remote Assessments)

As of October 1st, 2018, the U.S. Coast Guard has announced updates to the National Preparedness for Response Exercise Program (PREP) guidelines. The final 2016.1 guideline is now available and contains significant changes to Salvage and Marine Firefighting Remote Assessment and Consultation (RAC) requirements.


REMOTE ASSESSMENT AND CONSULTATION "Fire/Explosion"

The RAC exercise has been reduced from one annual RAC drill per vessel to one triennial RAC drill per plan holder. Under these guidelines plan holders have discretion for vessel selection but are encouraged to conduct random selections when determining which vessel, within a fleet of vessels, performs a RAC Drill. If a plan holder elects to do a single RAC drill per plan for one triennial cycle, that RAC drill MUST contain a fire/explosion component to meet other RAC drill PREP requirements.

The PREP Guidelines follow the calendar year (January 1 –December 31), we recommend that any changes you implement in terms of the RAC exercise frequency should not be done until January 1, 2019 and/or conform with the instructions provided to you by your Qualified Individual.

Under existing PREP guidelines, the vessel owner or operator must maintain RAC exercise records for manned vessels in a minimum of two locations, on the vessel and with one of the following: the U.S. location of the QI, the vessel owner or operator, the IMT, or the SMFF provider. The Vessel Response Plan must state the location of the records. This requirement remains unchanged in the 2016.1 PREP Guidelines. The Coast Guard encourages plan holders to maintain RAC exercise records on board each vessel listed in the plan. This will assist the Coast Guard when it verifies compliance with exercise requirements during vessel inspections.

In previous years, DONJON-SMIT has submitted to you in advance casualty information sheets for groundings and fire/explosions. These are guiding documents for discussions with your vessel on the vessel-specific information that we would seek in the event of a real incident of that type. Distributed with this TTX document is a general casualty information sheet for RACs that can be used for all incident types.

Upon completion of the RAC drill a certificate will be distributed and electronically saved within your DONJON-SMIT online web access portal in your Company's documentation folders. The cost for drill performance and completion certificates will continue to be $75-per certificate. We look forward to working with you and your crews. Should questions exist please let us know.

Combined Salvage and Marine Firefighting Management Team Tabletop Exercise

What is the focus of the SMFF TTX and who is expected to participate?

The Salvage Management Team & Marine Firefighting Management Team

As stated in the PREP Frequently Asked Questions (FAQ's) published by the USCG:

> *"Per the 2016 PREP Guidelines, the shore-based salvage and marine firefighting table-top exercises are expected to include the management team from the SMFF resource provider as defined in a VRP. Objectives are focused on the resource provider's ability to communicate and make decisions pursuant to a salvage and/or marine firefighting scenario."*

PREP allows service providers to utilize actual responses for exercise credit. Donjon-SMIT has taken credit for actual responses conducted this year to extend SMFF TTX credit to our clients (plan holders).

We invite Donjon-SMIT clients to participate in the tabletop exercises through comments to this documentation. Additionally, Donjon-SMIT personnel are available to participate directly in your TTX in conjunction with your incident management team tabletop exercises. Please see pricing details in the relevant section.

Applicability, Frequency, and Initiating Authority

- Shore-based Salvage Tabletop Exercise (Salvage TTX): Tank vessels and NTVs carrying oil as cargo or fuel.
- Shore-based Marine Firefighting Exercise (MFF TTX): Tank vessels and NTVs carrying oil as cargo or fuel. (Not required for NTVs with an oil capacity of less than 250 barrels.)
- One shore-based Salvage TTX per year, and one MFF TTX per year.
- The TTX is initiated by company policy, or via an actual response through Vessel Response Plan (VRP) Activation.

Actual Responses through VRP Activation

At various dates, times, Captain of the Port Zones, and operating areas throughout 2018, Donjon-SMIT was engaged in twelve incidents through Vessel Response Plan activation. The Vessel Response Plan (VRP), as required under the Oil Pollution Act of 1990 (OPA-90), is activated when there is an incident or circumstance that presents a threat of pollution. Each case Donjon-SMIT was engaged in this year was unique in nature and type / scope of services required. As with all VRP activations of Salvage and Marine Firefighting services, the process begins with a Remote Assessment and Consultation between Owner(s)/Vessel(s) and Donjon-SMIT. In some cases, nothing further is required.

Donjon-SMIT, the contracted Salvage and Marine Firefighting (SMFF) provider was notified by owners in the below documented cases and quickly responded, dispatching local and cascade salvage team personnel and equipment as appropriate. In all the cases, quick activation of the VRP lessened the likelihood of situations escalating and deteriorating, which ultimately saved clients and their underwriters the considerable costs attendant to environmental restoration efforts. Donjon-SMIT protects both shipowner and environmental interests and sets the industry standard for OPA-90 response services to the maritime community.

Participating Elements

Salvage Management Team and MFF Management Team as established in the response plan. Participating personnel from Donjon-SMIT, SMIT, and/or Donjon:

S. Boudreaux
R. Fredricks
R. van Gelder
M. Haldenwang
P. Hankins
B. Kratz Jr.
G. Lorenson
M. Lozano
D. Martin
S. Newes
J. Sluijmers
T. Williamson
J. Witte

Objectives

Exercise the Salvage and MFF Management Team's organization, communication, and decision making in managing a salvage response as established in PREP Guidelines 3.11 & 3.12.

- *See section "Checklist: Salvage Management Team Table Top Exercise Objectives Tested"*
- *See section "Checklist: Marine Firefighting Management Team TTX Objectives Tested"*

Exercise Completion Items & Results

The Salvage and Marine Firefighting Management Team Tabletop Exercise was conducted with the following items completed. Results are as documented. *(Continued on next page.)*

Summary of Response Activities and Actions

Date(s) Performed:

January 2018 through December 2018

Initiation Time:

Various

Completion Time:

Various

Response plan scenario used:

- ✓ **Hull Damage**
- ✓ **Machinery Damage**
- ✓ **Stranding or Grounding**
- ✓ **Allision**
- ✓ **Sinking**
- ☐ Collision
- ☐ Stress Fractures
- ✓ **Fire/Explosion**

Exercise or Actual Response:

Actual responses

If an exercise, announced or unannounced:

Not exercises, and all unannounced.

Location:

Captain of the Port Zones:

- Corpus Christi
- St. Petersburg (Tampa)
- Mobile
- New Orleans
- Buffalo
- Los Angeles – Long Beach
- San Juan

A. Knowledge of the response plan and, when exercising the MFF team, the pre-fire plan;

One response during 2018 in which Donjon-SMIT's Salvage and Marine Firefighting Management Team was activated was an incident involving product contamination in a vessel's pump room's void space. In cases of this nature, effective action is necessary to resolve the situation in a safe manner and to mitigate potential hazards. All parties involved with the response had a good comprehension of the contents of the VRP, from the Qualified Individual to Donjon-SMIT as the SMFF resource provider. Donjon-SMIT was notified, with appropriate SMFF assets activated, deployed and managed by experienced SMFF personnel.

On a voyage to Long Beach, California, the vessel discovered a mixture of product and water in the pump room void space, which is the compartment directly underneath the lower level of the pump room. It has been determined that the product (Naphtha) entered the pump room void space as a result of using the crossover piping which was damaged and leaking (unknown at the time) during her discharge of Naphtha in China. Water was introduced during tank cleaning operations using the same crossover piping. The crossover piping was subsequently secured.

Donjon-SMIT was activated to develop and execute a plan to allow the vessel to safely proceed to her destination and safely discharge her cargo. Discharge of the vessel's cargo required use of the vessel's

pumps in the pump room, and there was concern due to the void space having been contaminated with Naphtha and resultant LEL readings. The vessel's location in California complicated matters due to lack of disposal facility availability and costs to dispose of the contamination in the void space. Additionally, the vessel's slop tanks were being utilized for cargo. Donjon-SMIT referred to the on-file vessel pre-fire plan, other vessel drawings, and other pertinent information to begin conducting a remote assessment and onsite assessment to evaluate several possible courses of action.

Multiple methods were evaluated before determining the final course of action and sequence of remediation steps. Some alternative methods discussed were transferring the oily/water mixture to an available fresh water tank onboard or transferring the oily/water mixture to a barge. All alternative methods were rejected as inferior due to safety concerns. These alternative methods would require the utilization of portable pumps independent of the ship's systems and would require accessing the void space via manhole covers for placement of the pumps. This would create a suboptimal situation where inert gas and vapors would be entering the lower level of the Pump Room, necessitating even greater precautions for personnel safety.

It was decided that regardless of further actions, that the void space would be inerted as the first step. Preparations were made to fabricate a closed inerting system that utilized nitrogen gas to purge the atmosphere and lower oxygen levels in the void space.

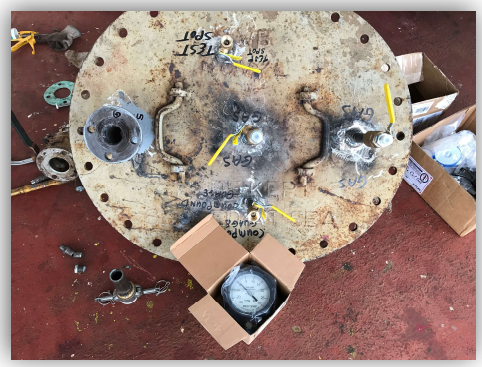
The ultimate method to restore the vessel to normal operating conditions was broken up into five (5) operational steps, namely:

1. Inerting the pump room void space
2. Securing the vent to void space
3. Internal transfer from slop tanks of the vessel's cargo freeing slop tanks.
4. Transferring oily/water mixture in the pump room void space to the vessel's slop tanks
5. Returning the pump room void space to a gas free environment.

QI and Donjon-SMIT provided representation to the U.S. Coast Guard, submitting and presenting the salvage plan for concurrence.

The pump room void space had four entry/exit locations, excluding the stripping pump and associated cargo piping. The space had two manhole entry locations, one sounding tube, and an air vent that was located immediately adjacent to the pump room on the main deck level. Inerting of the space was conducted as follows:

1. A spare manhole cover was modified to allow for gas readings, injection of nitrogen gas, and ullage readings. This modified cover was placed over the starboard side manhole entrance.
2. Port side manhole remained in place.
3. A sounding tube was utilized to monitor void space levels during cargo operations and tank discharge operations.
4. The topside vent was modified to allow for gas readings and the vent was extended to the port side of the vessel. A flame preventer was outfitted on the extended opening.



With a marine chemist present:

1. Initial readings (LEL and oxygen levels) were taken from the starboard side manhole cover location and topside vent location.
2. After completion of initial readings, water was added to the pump room void space until it reached 2/3 capacity. This reduced the amount of nitrogen needed for inerting.
3. Nitrogen was introduced via the starboard side manhole cover location in a controlled manner. Nitrogen volume up to two times the volume of the space was released into the pump room void space.
4. During the release of nitrogen, gas readings were taken from the topside vent location and the lower level of the pump room above the void area. Venting on topside was monitored for when gas levels reached an inert level (oxygen levels less than 6%).

After completion of the inerting operations, the vessel conducted an internal transfer of her slop tanks to the cargo tanks. This was done with the utilization of both the cargo pump #1 and the stripping pump. Cargo tanks were topped off from aft moving forward. The void space was then discharged via normal shipboard operations/systems via the void space stripping pump to the slop. The void space was kept inert via nitrogen injection as the level of liquid lowered.

Once the contents of the pump room void space were discharged to the vessel's slop tanks, gas freeing operations of that space began. The operations at this stage were straight forward:

1. Filled void space with sea water.
2. As the void space was filled with sea water, the inert gas/vapors were pressed out of the space through the vent.
3. Discharged void space to slop tank, and fresh air drawn into the space via the vent.

The space was then tested (dried and cleaned as needed) via standard shipboard procedures to ensure a gas free environment to allow entry to determine cause of leakage.

For plan holders not involved in this response, knowledge of the response plan is exercised (and credit taken) by your participation in the IMT TTX as indicated under the previously noted objectives attachments.

B. Proper Notifications;

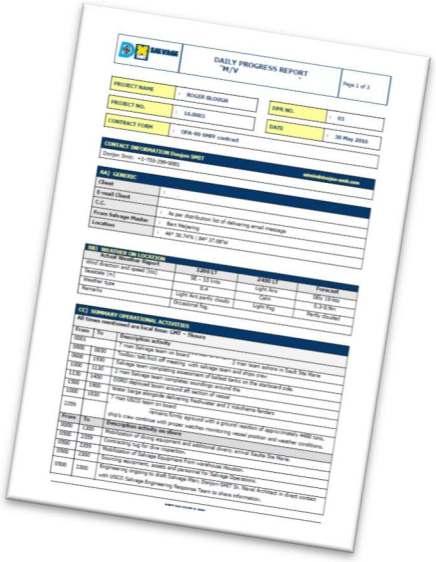
In all documented cases that occurred in 2018, owners gave notice to the U.S. Coast Guard, their Qualified Individual, or Donjon-SMIT directly, and swiftly activated their response plan and Salvage and MFF Management team, their contracted SMFF provider, Donjon-SMIT LLC. Steps were than immediately taken by the Salvage and MFF Management team to begin initializing a response.

The importance of proper notifications and activation of the vessel response plan was demonstrated during a case that spanned the end of 2017 and beginning of 2018. This incident was a grounding in the St. Lawrence Seaway, which taken alone can be serious circumstance. However, the pressing need for a very rapid response was due to the imminent closure of the Seaway's locks for the winter season. The onset of winter in the region was swift with rapidly accumulating ice which was making the locks inoperable. It was of critical importance to refloat the vessel in a timeframe that enabled her to depart the Seaway and to not become trapped for the winter. Proper notifications and activation were paramount to the operation.

For plan holders not involved in this response, proper notifications are exercised (and credit taken) by your participation in the IMT TTX and/or your vessels conducting the Remote Assessment and Consultation exercise as indicated under the previously noted objectives attachments.

C. Communications System;

During each response Donjon-SMIT undertook in 2018, Donjon-SMIT, within the incident command structure (or with the owner(s) crisis management team), successfully executed internal and external communications by multiple methods. Communications within the Salvage and MFF Management Team and operations onboard the *vessel(s)* were executed as planned, with information flowing from the command post (or owner(s) crisis management team) to the salvage team aboard the vessel and the reverse. Daily progress reports documenting the salvage and marine firefighting efforts were produced by the Salvage and MFF Management Team and provided to all parties involved in the response. These daily progress reports (DPRs) included:



- Encountered weather onsite;
- A summary of operational activities and their time conducted;
- Operations planned for the next 24 hours;
- Operational milestones;
- Craft on hire;
- Equipment on hire;
- Personnel;
- Visitors; and,
- Points of consideration.

D. Ability to Access Salvage & MFF Provider;

As prescribed by the pre-established OPA-90 Salvage, Firefighting and Lightering Contract and Funding Agreement, Donjon-SMIT and the plan holder(s) agreed to appropriate follow-on contract terms. With the funding agreement(s) already in place, Donjon-SMIT, as the salvage and MFF Management Team was able to rapidly initiate a local response, followed by a cascade of regional and international personnel and equipment as each situation required.

E. Coordination of personnel responsible for, and deployment of, resources identified for spill prevention, salvage, MFF

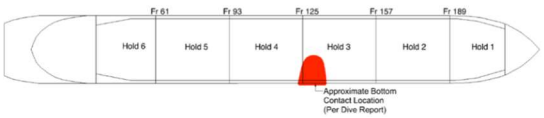
The coordination of response personnel and resources that are activated in accordance with a Vessel Response Plan (VRP) is accomplished on several levels through the Incident Management Team (IMT) and through the Incident Command System (ICS) structure. The Incident Command System (ICS) is a management system designed to enable effective and efficient incident management by integrating a combination of facilities, equipment, personnel, procedures, and communications operating within a common organizational structure. ICS is normally structured to facilitate activities in six major functional

areas: command, operations, planning, logistics, finance and administration. The size and structure of the ICS is highly flexible to adapt to incidents of any size or scope.

Some of the various components of a plan holder's USCG Vessel Response Plan (VRP) include:

1. Notification procedures regarding the Qualified Individual (QI), USCG, affected State, Oil Spill Removal Organizations (OSROs), Salvage and Marine Firefighting (SMFF) provider, etc.
2. Spill mitigation procedures concerning shipboard response, casualty actions, damage stability and health and safety issues.
3. Shore-based response activities such as the QI's responsibilities, company crisis management team involvement and use of the Incident Command System (ICS) for response management.
4. Response contractor activities and capabilities including spill containment, recovery and environmental protection.
5. Salvage activities involving the SMFF provider.
6. Media management.

As your SMFF provider, from the onset of a notification of an incident and an activation of a response plan by a plan holder, Donjon-SMIT engages and manages salvage personnel and resources as needed. Coordination with vessel owners, QI, USCG, State, OSROs and other parties is done through ICS. The SMFF function is typically under the Operations section.



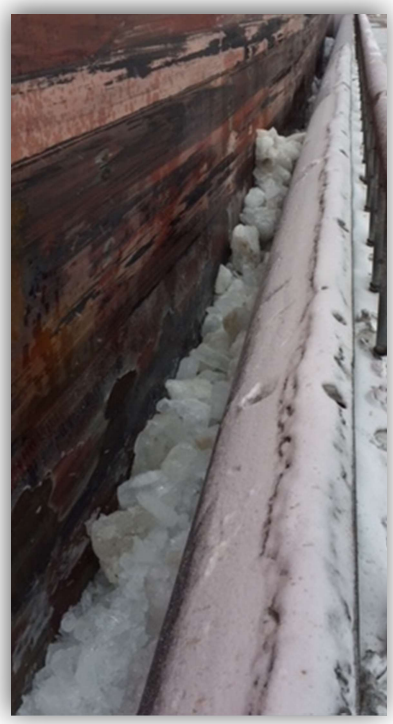
For the salvage response referenced in section E, the grounding in the St. Lawrence River, the response began with a Remote Assessment and Consultation by Tim Williamson of Donjon-SMIT. A Donjon-SMIT Salvage Master was immediately deployed when activated and arrived onsite to begin the onsite salvage assessment. An ICS command structure was established locally ashore.

The salvage team, led by Salvage Master Jaco Sluijmers, conducted an extensive assessment of the vessel and began working on a salvage plan. The vessel was loaded with 19.680 MT of soybeans and touching bottom on starboard side at the Bulkhead H3 and H4. The mean draft forward was 7.7 meters and an aft draft of 7.98 meters, with a slight 1.4° list to starboard and approximately 2 centimeters of sagging.

A GHS model of the hull was created based on the table of offsets from DONJON-SMIT's OPA-90 vessel files. Using that model and the pre and post casualty drafts, it is estimated that the vessel had a ground reaction of approximately 750 MT, centered approximately 110m forward of the aft perpendicular (Fr 137). Those results corresponded well with the lead line survey as well as the observed insets in the bottom plating and dive survey.

Initially, it was not recommended to refloat the vessel without lightering due to concerns about fuel stored in the double bottom tank #4. A lightering plan was developed, and lightering assets activated and deployed. The arrangement of lightering assets proved somewhat challenging because the resources were already laid up for the season. With Hold #3 located directly over the estimated center of ground reaction, it was planned to lighter the entire contents of Hold #3 (780 MT) which would substantially reduce the ground reaction. If, upon lightering all 780 tons of cargo from Hold #3, the vessel had not floated free, cargo would then be lightered from Hold #4 until she was refloated.

Due to the rapidly accumulating ice, the Seaway's locks were becoming increasingly at risk of being inoperable. Time was of the essence to refloat the vessel. Failure to refloat would risk the vessel being stranded in the Seaway for the winter. While the lightering assets were underway to the site, it was decided to attempt ballasting to reduce ground reaction and utilize tugs for the refloating.



It was calculated that ballasting the #5 port wing ballast tank would reduce ground reaction by between 30% - 50%. The plan was to add ballast to the #5 port wing tank until the heel is reduced to 0° or 1° to Port, approximately 400 to 500 tons of ballast. With the vessel pulled free of the ground via tugs, then the ballast on the port side would induce a list to port of approximately 7°. In that condition it was verified that the vessel meet IMO intact righting energy criteria and did not exceed her allowable strength requirements.

There was close consultation between the QI, local USCG, the USCG's Salvage Engineering Response Team, and Donjon-SMIT on the attempt to refloat without lightering. Tugs were positioned, made fast and slowly increased tension pulling the vessel according to directions from the salvage master. Once the tugs were arranged, ballasting operations commenced to reduce ground reaction. The vessel eventually refloated with de-ballasting the aft peak.

Phase II of the operation than commenced with ice breaking and getting the vessel through the locks before the Seaway's closure.

Of the Specialized Salvage Services as defined the SMFF regulations, such as a *Subsurface Product Removal and Heavy Lift*, only Heavy Lift was utilized (marine cranes) for deployment and staging of equipment for the responses that occurred during 2018. Personnel competent in Specialized Salvage Services were involved in the response as part of the SMFF Management Team.

Shore-based Marine Firefighting (MFF) TTX Objectives (F through I)

**(F. Remote assessment and consultation; G. On-site fire assessment; H. External firefighting teams; I. External vessel firefighting systems.)*

Objectives F though I of the shore-based MFF TTX were met by the Salvage and MFF Management Team during a response to the previously described pump room void space product contamination aboard a vessel. Cross-trained and experienced personnel for both salvage and MFF services conducted the remote assessment and consultation, and the subsequent on-site assessment. The salvage team was comprised of marine firefighting trained personnel.

Appropriate types of external vessel firefighting systems that are identified in the location specific SMFF Geographic Specific Annexes (incorporated by reference into VRPs) were deployed. Some of the deployed equipment with our team included:

- ✓ Nitrogen Gas
- ✓ Gas Monitors
- ✓ Positive Pressure Breathing Apparatuses
- ✓ Air Supply
- ✓ Emergency Escape Breathing Devices

F. Annual review of the transition from local team to commercial, regional, national and international team as appropriate.

During the remote assessment and consultation process, it is standard practice for Donjon-SMIT to evaluate the incident and condition of the vessel to determine the appropriate level of response personnel and assets. In some cases, response from local and regional personnel is appropriate. In other larger responses, a national and an international team is necessary to handle a multi-day/week long response.

During this year's responses, local, national and international team members were deployed.

G. Ability to coordinate response activity effectively with the IMT and NRS infrastructure.

The SMFF Management Team integrated within the IMT during all incidents from the early moments of activation. For those incidents that had an Incident Command Post, daily meetings occurred to brief the Command and General Staff, which included the Incident Commander (responsible party) and the USCG. These meetings covered discussions on SMFF response tactics, pollution contingency plans, and various salvage and operations plans. The plans reviewed by the IMT, in conjunction with review by the USCG's Salvage Engineering Response Team (SERT), included:

- Site Safety and Health Plan
- Project Specific Dive Plan
- Assessment of Structural Stability Findings
- Salvage Plan
- Marine Operations and Lightering Sequence Plan

DONJON-SMIT, LLC

Tim Williamson <twilliamson@donjon-smit.com>

Pump Room Contamination Remediation for [redacted]

6 messages

Wed, Jun 6, 2018 at 7:06 PM

[redacted]

Mr. Williamson,

Your plan for the Pump Room Void Space Product Contamination Remediation as discussed this afternoon has been accepted by the Captain of the Port. Upon commencement of the plan and every 4 hours throughout the evolution, please contact the D1 Duty Inspector at [redacted]. I will be the duty inspector until Tuesday morning.

If you have additional questions or concerns, please contact me at the duty number.

Regards,

[redacted]

Inspection Division
USCG Sector Los Angeles-Long Beach
1001 S. Seaside Ave. Bldg. 20
San Pedro, CA 90731

H. Ability to access information in the ACP for resources available in the area, unique conditions of the area, etc.

Area Contingency Plan(s) were utilized to identify sensitive nearby locations and develop an environmental protection plan where necessary. The ACP(s) were also reviewed for appropriate berths for sheltering and lightering operations, depending on the evolving requirements of the variously sited casualties.

In another of this year's responses, an anchor was lost in the Mississippi river. The ACP for the area was reviewed for any unique concerns identified in the area such as the presence of underwater pipes or other obstructions.

Recommendations/Comments

During 2018, Donjon-SMIT's Management Team came to the assistance of clients in several regions in the United States, responding to vessel incidents at pier and nearshore, including salvage in a specific regional geographic environment that was experiencing significant ice conditions. Overall, the responses were executed very well. There were incidents of various types which tested the communications and coordination that occurs between the vessel owner/operator, Qualified Individuals, USCG, the relevant State, Class representative, Donjon-SMIT, and other members of the response community. The responses offered real world incidents that exercised company representatives in incident response and allowed the opportunity to review appropriate emergency procedures.

As a reminder, effective response efforts that prevent damage to the environment require prompt notifications. Notification of an issue or potential issue during a Remote Assessment and Consultation does not necessarily result in the activation of SMFF personnel and resources. Notification does, however, alert Donjon-SMIT to a situation that may require salvage services and allow us to begin identifying and organizing the closest and best suited response assets and personnel.

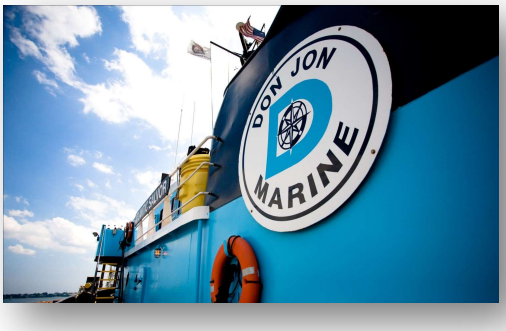
Donjon-SMIT recommends that each client plan holder review their emergency procedures in-office as well as onboard individual vessels. Regardless of the type of incident that generates a response, timely activation of your vessel response plan (VRP) ultimately results in a more effective and rapid response that protects the environment and saves both time and resources.

We also suggest that when participating in your IMT TTX with your Qualified Individual, that you address any questions you may have about salvage and MMF concerns during a response. Additionally, each client plan holder should consider holding an annual in-office exercise(s) to train for U.S. and global incidents. These training sessions should be documented and lessons-learned shared with staff and vessel personnel.

Conclusions

Donjon-SMIT was involved in several responses in various U.S Captain of the Port Zones, each with its own unique topography and environmental concerns. The robust responses initiated by owners and operators resulted in a timely resolution to each situation. Working together, you, the Plan Holder, and we, your chosen SMFF provider, Donjon-SMIT, successfully dealt with all manner of marine casualties, saved lives and property, and protected our precious environment and natural resources.

This report confirms that Donjon-SMIT (as the Salvage and Marine Firefighting Management Team) and by extension its client plan holders have met the stated objectives of the Salvage and Marine Firefighting Management Team Tabletop Exercise. Thus, vessel plan holders who name Donjon-SMIT as their Salvage and Marine Firefighting Service Provider have met the intent of the USCG 2016 PREP guidelines. Finally, companies should maintain the letter of attestation and certification contained in this document to document full compliance with PREP's annual SMFF TTX and equipment deployment exercise requirements.



We trust this documentation and evaluation of the multiple responses in 2018, and the utilization of Donjon-SMIT as the Salvage and Marine Firefighting Management Team, have been helpful. If you have any questions, please do not hesitate to contact us.

Checklist: Salvage Management Team Table Top Exercise Objectives Tested

The following objectives as identified in the 2016 PREP Guidelines were exercised and evaluated through actual performance, discussion, or simulation. Note that as stated in the 2016 PREP Guidelines:

> "Plan holders may take credit for exercise requirements that are met by activities conducted in conjunction with other exercises, or during response to an actual incident, as long as the PREP exercise objectives are met, the response was evaluated, and the proper records are maintained."

3.11.A. Knowledge of the response plan.

Fulfilled by: ☒ IMT TTX ☒ RACE ☒ This Exercise ☐ Not Met ☐ N/A

3.11.B. Proper Notifications:

Test the notification procedures identified in the response plan being exercised.

Fulfilled by: ☒ IMT TTX ☒ RACE ☒ This Exercise ☐ Not Met ☐ N/A

3.11.C. Communications System:

Demonstrate the ability to establish an effective internal and external communications system for the response organization.

Fulfilled by: ☒ IMT TTX ☒ RACE ☒ This Exercise ☐ Not Met ☐ N/A

3.11.D. Ability to Access Salvage Provider:

Ability to access a salvage provider identified in the response plan.

Fulfilled by: ☒ IMT TTX ☒ RACE ☒ This Exercise ☐ Not Met ☐ N/A

3.11.E. Coordination of personnel responsible for and deployment of resources identified for spill prevention and salvage:

3.11.E.1. ***Remote Assessment and Consultation.***

Fulfilled by: ☐ IMT TTX ☒ RACE ☒ This Exercise ☐ Not Met ☐ N/A

Checklist: Salvage Management Team Table Top Exercise Objectives Tested

3.11.E.2. ***Begin Assessment of Structural Stability.***

Fulfilled by: ☐ IMT TTX ☒ RACE ☒ This Exercise ☐ Not Met ☐ N/A

3.11.E.3. ***On-Site Salvage Assessment.***

Fulfilled by: ☐ IMT TTX ☐ RACE ☒ This Exercise ☐ Not Met ☐ N/A

3.11.E.4. ***Assessment of Structural Stability.***

Fulfilled by: ☐ IMT TTX ☐ RACE ☒ This Exercise ☐ Not Met ☐ N/A

3.11.E.5. ***Hull and Bottom Survey.***

Fulfilled by: ☐ IMT TTX ☐ RACE ☒ This Exercise ☐ Not Met ☐ N/A

3.11.E.6. ***Emergency Towing.***

Fulfilled by: ☐ IMT TTX ☐ RACE ☒ This Exercise ☐ Not Met ☐ N/A

3.11.E.7. ***Salvage Plan.***

Fulfilled by: ☐ IMT TTX ☐ RACE ☒ This Exercise ☐ Not Met ☐ N/A

3.11.E.8. ***External Emergency Transfer Operations.***

Fulfilled by: ☐ IMT TTX ☐ RACE ☒ This Exercise ☐ Not Met ☐ N/A

3.11.E.9. ***Emergency Lightering.***

Fulfilled by: ☐ IMT TTX ☐ RACE ☒ This Exercise ☐ Not Met ☐ N/A

3.11.E.10. ***Other Refloating Methods.***

Fulfilled by: ☐ IMT TTX ☐ RACE ☒ This Exercise ☐ Not Met ☐ N/A

3.11.E.11. ***Making Temporary Repairs.***

Fulfilled by: ☐ IMT TTX ☐ RACE ☒ This Exercise ☐ Not Met ☐ N/A

3.11.E.12. ***Diving Services Support.***

Fulfilled by: ☐ IMT TTX ☐ RACE ☒ This Exercise ☐ Not Met ☐ N/A

3.11.E.13. ***Special Salvage Operations Plan.***

Fulfilled by: ☐ IMT TTX ☐ RACE ☒ This Exercise ☐ Not Met ☐ N/A

3.11.E.14. ***Subsurface Product Removal.***

Fulfilled by: ☐ IMT TTX ☐ RACE ☒ This Exercise ☐ Not Met ☐ N/A

3.11.E.15. ***Heavy Lift.***

Fulfilled by: ☐ IMT TTX ☐ RACE ☒ This Exercise ☐ Not Met ☐ N/A

3.11.F. Annual review of the transition from local team to commercial, regional, national and international team as appropriate.

Fulfilled by: ☒ IMT TTX ☐ RACE ☒ This Exercise ☐ Not Met ☐ N/A

3.11.G. Ability to coordinate response activity effectively with the IMT and NRS infrastructure.

Fulfilled by: ☒ IMT TTX ☐ RACE ☒ This Exercise ☐ Not Met ☐ N/A

3.11.H. Ability to access information in the ACP for resources available in the area, unique conditions of the area, etc.

Fulfilled by: ☒ IMT TTX ☐ RACE ☒ This Exercise ☐ Not Met ☐ N/A

Checklist: Marine Firefighting Management Team TTX Objectives Tested

The following objectives as identified in the 2016 PREP Guidelines were exercised and evaluated through actual performance, discussion, or simulation. Note that as stated in the 2016 PREP Guidelines:

> "Plan holders may take credit for exercise requirements that are met by activities conducted in conjunction with other exercises, or during response to an actual incident, as long as the PREP exercise objectives are met, the response was evaluated, and the proper records are maintained."

3.12.A. Knowledge of the response plan and when exercising the MFF team, the pre-fire plan.

Fulfilled by: ☒ IMT TTX ☒ RACE ☒ This Exercise ☐ Not Met ☐ N/A

3.12.B. Proper Notifications:

Test the notification procedures identified in the response plan being exercised.

Fulfilled by: ☒ IMT TTX ☒ RACE ☒ This Exercise ☐ Not Met ☐ N/A

3.12.C. Communications System:

Demonstrate the ability to establish an effective internal and external communications system for the response organization.

Fulfilled by: ☒ IMT TTX ☒ RACE ☒ This Exercise ☐ Not Met ☐ N/A

3.12.D. Ability to Access an MFF Provider:

Ability to access a marine firefighting provider identified in the response plan.

Fulfilled by: ☒ IMT TTX ☒ RACE ☒ This Exercise ☐ Not Met ☐ N/A

3.12.E. Coordination of internal organization personnel with responsibility for spill prevention and MFF.

Fulfilled by: ☒ IMT TTX ☐ RACE ☒ This Exercise ☐ Not Met ☐ N/A

3.12.F. Remote Assessment and Consultation.

Fulfilled by: ☐ IMT TTX ☒ RACE ☒ This Exercise ☐ Not Met ☐ N/A

3.12.G. On-site Fire Assessment.

Fulfilled by: ☐ IMT TTX ☐ RACE ☒ This Exercise ☐ Not Met ☐ N/A

3.12.H. External Firefighting Teams.

Fulfilled by: ☐ IMT TTX ☐ RACE ☒ This Exercise ☐ Not Met ☐ N/A

3.12.I. External Vessel Firefighting Systems.

Fulfilled by: ☐ IMT TTX ☐ RACE ☒ This Exercise ☐ Not Met ☐ N/A

3.12.J. Annual review of the transition from local team to commercial, regional, national and international team as appropriate.

Fulfilled by: ☐ IMT TTX ☐ RACE ☒ This Exercise ☐ Not Met ☐ N/A

3.12.K. Ability to coordinate response activity effectively with the IMT and NRS infrastructure.

Fulfilled by: ☒ IMT TTX ☐ RACE ☒ This Exercise ☐ Not Met ☐ N/A

3.12.L. Ability to access information in the ACP for resources available in the area, unique conditions of the area, etc.

Fulfilled by: ☒ IMT TTX ☐ RACE ☒ This Exercise ☐ Not Met ☐ N/A

Equipment Deployment – Vessels (SMFF equipment)

Applicability, Frequency, and Initiating Authority

Vessels with SMFF equipment cited in their plans, conduct an annual SMFF equipment deployment exercise. Equipment Deployment is initiated by company policy, or via an actual response through Vessel Response Plan (VRP) Activation.

Donjon-SMIT 2018 PREP Equipment Deployment Summary Report

Please find below the Donjon-SMIT 2018 Annual Preparedness for Response Exercise Program (PREP) Equipment Deployment Summary Report for review and retention. This report documents SMFF equipment deployment exercise information in compliance with the Preparedness for Response Exercise Program (PREP) Guidelines for reportable and evaluated equipment deployments during exercises, training and actual salvage responses. It provides information necessary for your SMFF equipment deployment credit for the 2018 calendar year, the third year of a triennial cycle.

The information categories include:

- **COTP ZONE** - The COTP Zone in which the response equipment was deployed
- **LOCATION** - The geographical location in which the equipment was deployed.
- **EXERCISE OR ACTUAL RESPONSE** – Identifies whether the equipment was deployed during an exercise or an actual response.
- **ANNOUNCED OR UNANNOUNCED** – Whether the equipment was deployed during a planned event, or if the exercise (if not a response) is unannounced.
- **OPERATING AREA** – Which SMFF operating area was the equipment deployed in; Pier, Nearshore, Offshore, or Other.
- **SALVAGE AND/OR MARINE FIREFIGHTING** – Denotes the salvage and/or marine firefighting service involved in the deployment.

Equipment Deployment – Vessels (SMFF equipment)

DONJON-SMIT PREP Equipment Deployment 2018

													Operating Area				SALVAGE																Marine Firefighting	
																	i) Assessment & Survey:					ii) Stabilization:							iii) Specialized Salvage Operations:			i.) Assessment & Planning		ii.) Fire Suppression:	
	COTP Zone	Date	Location	Exercise	Actual Response	Announced	Unannounced	USCG Vetting	Muster Drill	Telephone Confirmation Drill	Tabletop Exercise	Equipment Deployed	Pier	Nearshore	Offshore	Other	A.) Remote assessment and consultation	B.) Begin assessment of structural stability	C.) On-site salvage assessment	D.) Assessment of structural stability	E.) Hull and bottom survey	A.) Emergency towing	B.) Salvage plan	C.) External emergency transfer operations	D.) Emergency lightering	E.) Other refloating methods	F.) Making temporary repairs	G.) Diving services support	A.) Special salvage operations plan	B.) Subsurface product removal	C.) Heavy Lift	A.) Remote assess & consult	B.) On-site fire assessment	A.) External firefighting teams	B.) External VSL firefighting systems
DISTRICT 7	Charleston	08/14/2018 - 08/15/2018	Sunken Barge Near Surfside Beach, South Carolina		1		1							1			1																	
	San Juan (PR/USVI)	Ongoing	San Juan Pumping Requirements		1	1							1											1	1									
	St Petersburg (Tampa)	02/03/2018 - 02/07/2018	Damaged Hull - Damage Stability Calculations		1		1							1			1	1		1														
DISTRICT 8	Corpus Christi	07/28/2018 - 07/29/2018	Engine Room Machinery Failure		1		1					1					1		1															
	Mobile	10/11/2018 - 10/18/2018	Fishing Vessel Sinking		1		1							1			1						1											
	New Orleans	03/18/2018 - 03/22/2018	Vessel Lost Anchor in Mississippi River		1		1					1		1			1		1		1		1											
	New Orleans	08/10/2018 - 08/15/2018	Engine Room Machinery Failure, Emergency Towing		1		1					1		1			1					1												
DISTRICT 9	Buffalo	12/28/2017 - 01/08/2018	Vessel Grounding and Ice Conditions in the St. Lawrence Seaway		1		1					1		1			1	1	1	1	1	1	1		1			1						
DISTRICT 11	Los Angeles - Long Beach	05/31/2018 - 06/12/2018	Vessel Had Explosive Atmosphere in Pump Room Void Space		1		1					1		1			1												1			1		1

Individual Plan Holder SMFF TTX Requests/Pricing

Overview

Donjon-SMIT meets all clients' TTX requirements free of cost without your direct involvement. Any TTX exercises conducted by our clients are voluntary.

Plan holders may wish to have customized and direct participation of their Salvage and Marine Firefighting Management Team in their IMT TTX and other exercises. Although this is not required for your PREP SMFF TTX requirements credit, Donjon-SMIT is happy to accommodate this request to participate in TTXs either remotely or to attend at the location of the exercise if possible. Donjon-SMIT can customize the scale of involvement, and the amount of personnel involved, depending on your needs.

Remote TTX Participation

Remote TTX Participation:

Personnel Type	Announced Remote TTX Rate	Unannounced Remote TTX Rate
Salvage Master	$676	Surcharge 2x
Naval Architect or Salvage Officer/Engineer	$564	Surcharge 2x
Assistant Salvage Officer/Engineer, or Contracts Mgr.	$452	Surcharge 2x
Specialist Advisors – Fire Fighters, Chemicals, Pollution	$454	Surcharge 2x

In House TTX Participation

For TTX's where Donjon-SMIT's participation is conducted via on-site participation for a 1 day drill.* (Donjon Smit will minimizing travel where possible by utilizing personnel in the vicinity of your TTX where travel is required. Domestic participation will be charged for the actual day of the drill or multiple days for drills covering more than 1 day. For drills where international travel is required 2 additional days hire for travel to and from will be added.)

Personnel Type	In House TTX Rate
Salvage Master	$1,353
Naval Architect or Salvage Officer/Engineer	$1,128
Assistant Salvage Officer/Engineer, or Contracts Mgr.	$904
Specialist Advisors – Fire Fighters, Chemicals, Pollution	$907

**Travel costs (if any) billable at cost with 10% uplift*

Participation in Other Exercises

Donjon Smit is pleased to discuss any of your custom exercise needs. Please contact us with your Exercise requirements and our team can prepare a specific proposal for your requirements.

Attestation and Certification

Date: December 1, 2018

Dear Valued Donjon-SMIT Clients,

I, Timothy P. Williamson of Donjon-SMIT, LLC, a Salvage and Marine Firefighting Service Provider (SMFF) with full SMFF coverage in all Captain of the Port Zones, for all operating areas within the United States do hereby attest, based on my own personal knowledge, that all the salvage and marine firefighting objectives under the SMFF TTX provisions of the 2016 PREP guidelines have been met for 2018. Additionally, that salvage and marine firefighting equipment, more than adequate to satisfy the SMFF equipment deployment drill requirements of OPA '90 have been deployed on your behalf in the United States within the most recent calendar year, the third year of a triennial cycle which began in 2016.

Further that Donjon, SMIT, and/or Donjon-SMIT owned equipment is inspected and maintained under a formal preventive maintenance program. Personnel training requirements are met through formal training and apprentice programs. The personnel who deployed the equipment demonstrated their ability to successfully deploy and operate the equipment and the equipment was in good working order.

Further, records of these above-mentioned activities are maintained at our headquarters in Houston, Texas, USA. This certification is good for all plan holders who list Donjon-SMIT, LLC as their OPA-90 SMFF provider, for the year 2018, for the following PREP exercises:

- 3.11 TTX: Shore-based Salvage Exercise
- 3.12 TTX: Shore-based Marine Firefighting Exercise
- 3.15 DRILL: Equipment Deployment – Vessels (SMFF Equipment)

Best Regards,

Timothy P. Williamson
General Manager
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