



Marine Safety Information Bulletin

Commandant
U.S. Coast Guard
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NTVRP Implementation Date Reminder

NTVRP Implementation Date

The “Nontank Vessel Response Plans and Other Response Plan Requirements” (NTVRP) final rule, which was published in the Federal Register on September 30, 2013, requires vessel owners or operators of nontank vessels 400 gross tons and above to prepare and submit oil spill response plans for vessels operating on the navigable waters of the United States by January 30, 2014.

Because many of the requirements in the NTVRP final rule are statutory mandates and regulatory constraints on our ability to extend the implementation date, the Coast Guard does not intend to extend the implementation date for the required submission of NTVRPs. We understand that the recent decision by the International Group of P&I Clubs to remove umbrella agreements as of January 30, 2014 has created challenges for vessel owners or operators that now have to contract directly with Oil Spill Removal Organizations (OSRO) by the January 30th implementation date. Further, the Coast Guard understands that the two main national resource providers have put in place mechanisms to address this direct contracting concern. As outlined below, we are using an Interim Operating Authorizations (IOA) process, similar to our implementation of the salvage and marine firefighting requirements, to assist vessels owners and operators to meet the deadline.

Minimum Requirements for IOA Issuance

Recognizing that time may be limited for plan holders and preparers to complete all elements of their NTVRPs before the January 30th deadline, the Coast Guard will issue 6-month IOA letters, as necessary, pursuant to 33 CFR 155.5023. To meet the requirements of 33 CFR 155.5023(a) and receive an IOA letter, vessels must submit a plan containing the minimum following information to COMDT (CG-CVC) at the above address:

- (1) identification of a qualified individual (QI) and alternate QI,
- (2) identification of an OSRO by contract or written consent as appropriate,
- (3) identification of a salvage and marine firefighting provider and submission of a salvage contract and funding agreement or written consent agreement as appropriate, and
- (4) signed certification statement as required by 33 CFR 155.5023(b).

Please note, if the plan is not fully compliant with other Subpart J requirements, i.e., pre-fire plan or vessel specific information is lacking, the certification statement should identify those plan elements that are incomplete.

Early submission of NTVRPs is highly recommended, even if the certification statement identifies NTVRP elements that are incomplete, in order to receive an IOA letter.

Additional questions regarding this matter should be forwarded to the Office of Commercial Vessel Compliance, VRP Program by email at vrp@uscg.mil.