



TECHNICAL CIRCULAR No. 201 of 13th June 2014

To:	All Surveyors/Auditors
Applicable to flag:	All Flags
Subject:	Non-tank vessel Response Plan, Expire July 31, 2014
Reference:	USCG MISB 42-13

NTVRP Interim Operating Authorizations Expire July 31, 2014

The "Non-tank Vessel Response Plans and Other Response Plan Requirements" (NTVRP) final rule, which was published in the Federal Register on September 30, 2013, required owners or operators of non-tank 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. The Coast Guard published MSIB 42-13 on December 19, 2013, and used an Interim Operating Authorization (IOA) process to assist vessel owners and operators to meet the January 30, 2014 deadline and continue to operate.

To date, the Coast Guard estimates approximately 1,100 IOA's are still outstanding, all of which expire on July 31, 2014. If you are an owner or operator, currently operating under an IOA, your goal is to pursue a full term 5 year authorization by July 31st. Therefore, please work with your plan preparers and salvage and marine firefighting organizations, to ensure any issued deficiencies and outstanding 33 CFR 155 - Subpart J requirements are adequately addressed. Also, please ensure you allow sufficient time for your plan to be reviewed and approved prior to July 31st, or prior to your vessels entry into U.S. waters after that date. To help you focus on the most common areas where deficiencies have been found while reviewing plans, please note the below list and pay particular attention to these details.

Most Common NTVRP Deficiencies Preventing Approval:

1. No Pre-Fire Plan (required for each non-tank vessel > 250 bbl capacity).
2. Required vessel diagrams are missing.
3. NTVRP is missing other required elements.

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Finally, the Coast Guard does not intend to provide a blanket extension to previously issued IOAs. Where a vessel owner or operator can demonstrate that they have been diligent in their efforts to comply with the regulations, or the Coast Guard is not able to review your plan ahead of July 31st, an additional IOA with a short expiration date may be issued. This determination will be made on a case by case basis.

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

REFERENCES:

- USCG CFR 155"J"

ATTACHMENTS: No.

Kindest Regards,

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