



16450
FEB 10 2021

Alaska Chadux Network
Attn: Buddy Custard
2347 Azurite Court
Anchorage, AK 99507

Dear Mr. Custard:

This letter is an amendment to the Coast Guard letter sent to you on December 14, 2018. In that letter the Coast Guard accepted Alaska Maritime Prevention & Response Network's Alternative Planning Criteria (APC) proposal for tank vessels carrying group I oils and non-petroleum oils as cargo in ports or places in Western Alaska. That APC was allowed to be used in Vessel Response Plans (VRP) from April 1, 2019 to July 1, 2021. I am now writing to inform you that **the period of validity stated in that previous letter is hereby amended to extend until March 31, 2024**. All other provisions and conditions as expressed in that letter are otherwise unchanged and shall remain in full force and effect until this new APC expiration date.

In 2020 the Coast Guard established the Maritime Oil-Spill Response Planning Advisory Group (MORPAG) to review management of alternatives and their incorporation into VRPs. The group consists of 20 members representing 13 Coast Guard Commands, all of which play a role in the management of alternatives and evaluation of response capability. The group recognizes that industry participation and support will be necessary for success and is therefore developing an engagement plan which will detail a strategic process to incorporate industry in a way that supports the interests of the Coast Guard, states, and industry stakeholders. Although formal integration of industry has not yet occurred, all group members are engaging informally with our Government and industry stakeholders during risk assessment discussions, VRP and APC reviews and Oil Spill Response Organizations (OSRO) performance assessment visits. In respect of this ongoing initiative, the Coast Guard is amending the acceptance period of current alternatives to allow their use for a maximum of 5 years from the most recent acceptance date in order to give the MORPAG time to complete its work.

As requested in your letter of February 4, 2021, this amendment also acknowledges the APC Administrator name change from Alaska Maritime Prevention & Response Network to Alaska Chadux Network. Please ensure your clients receive updated certificates reflecting this name change and advise them to include it in their annual VRP reviews.

Your clients who use this APC must keep a copy of this letter with their VRP onboard their vessel in addition to all other required documentation.

Vessel owners/operators using this APC as part of their VRP must continue to undertake the required annual reviews per 33 CFR 155.1070, including applicable APCs. They are encouraged to work with their APC Administrator to ensure this is done.

Please contact Mr. Chris Friese with any concerns or questions at christopher.r.friese@uscg.mil.

Sincerely,

A handwritten signature in blue ink, appearing to read "R. M. Alonso".

R. M. ALONSO
Captain, U. S. Coast Guard
Chief, Office of Marine Environmental Response Policy

Copy: CG PACAREA (3IM, 54)
CGD SEVENTEEN (dp, dr)
CG SECTOR Anchorage

U.S. Department of
Homeland Security

United States
Coast Guard



Commandant
United States Coast Guard

2703 Martin Luther King Jr Ave SE
Stop 7516
Washington, DC 20593-7516
Staff Symbol: CG-MER-1 (VRP)
Phone: (202) 372-1005

16450

Alaska Maritime Prevention & Response Network
Attn: Mr. Buddy Custard
1400 West Benson Blvd
Suite 220
Anchorage, AK 99503

DEC 14 2018

Dear Mr. Custard:

The Coast Guard reviewed your Alaska Maritime Prevention & Response Network's (AMPRN's) Alternate Planning Criteria (APC) proposal for tank vessels, submitted on May 13, 2018 in accordance with Title 33, Code of Federal Regulations, Section 155.1065, for the Western Alaska (WAK) Captain of the Port (COTP) Zone and CG-MER Policy Letter 01-17: Alternative Planning Criteria National Guidelines for Vessel Response Plans.

AMPRN's APC is accepted for tank vessels carrying group I oils and non-petroleum oils as cargo in ports or places in Western Alaska. Your clients must keep a copy of this APC attached to their respective VRPs, along with a copy of this letter onboard their vessels. Any deviation from the provisions in your APC must be communicated in writing to the Coast Guard WAK COTP for reevaluation.

This APC will take effect on **April 1, 2019** and will remain valid until **July 1, 2021**, subject to AMPRN demonstrating to the Coast Guard continued progress prior to the 2019 lightering season with the following:

1. Identify locations where lightering operations are intended and ensure response resources are available in these locations during times of vessel operations.
2. Establish detailed vessel routing procedures between designated lightering areas.
3. Provide clear contractual linkage between vessel owners/operators and resource providers. This should include formalized agreements for all supporting resources AMPRN does not own, including vessels, aircraft, and skilled labor.
4. Identify ocean response resources and explain what their capabilities are in remote locations. These resources need to comply with existing State and Federal regulatory requirements.
5. Provide a build out plan as per MER Policy Letter 01-17.

AMPRN should contact the Coast Guard WAK COTP and District Seventeen (D17) prior to the 2019 lightering season or sooner to demonstrate progress toward addressing the issues listed above. If the Coast Guard is not satisfied that adequate progress has been made towards these conditions, this APC acceptance may be subject to cancellation. If this occurs, the Coast Guard will provide written notice to AMPRN 30 days prior to cancellation in order to provide AMPRN additional time to demonstrate progress. Also, if it is determined resources are available and

capable of providing NPC for a vessel operating in any area covered by this acceptance, their VRP may not reference this APC and the plan holder must contract with resource providers able to meet their NPC requirements.

Questions concerning this letter may be directed to my VRP staff at vrp@uscg.mil.

Sincerely,

A handwritten signature in blue ink, appearing to read 'R. M. Alonso', with a stylized flourish at the end.

R. M. ALONSO
Captain, U.S. Coast Guard
Chief, Office of Marine Environmental Response Policy

Copy: Commander, Coast Guard Pacific Area (PAC-54, PAC-35)
 Commander, Seventeenth Coast Guard District (dp, dr)
 Commander, Coast Guard Sector Anchorage (s, sp, sr)



16450
FEB 10 2021

Alaska Chadux Network
Attn: Buddy Custard
2347 Azurite Court
Anchorage, AK 99507

Dear Mr. Custard:

This letter is an amendment to the Coast Guard letter sent to you on September 26, 2019. In that letter the Coast Guard accepted Alaska Maritime Prevention & Response Network's Alternative Planning Criteria (APC) proposal for tank vessels carrying group II-V oils as cargo in ports or places in Western Alaska. That APC was allowed to be used in Vessel Response Plans (VRP) from October 1, 2019 to September 30, 2022. I am now writing to inform you that **the period of validity stated in that previous letter is hereby amended to extend until March 31, 2024**. All other provisions and conditions as expressed in that letter are otherwise unchanged and shall remain in full force and effect until this new APC expiration date.

In 2020 the Coast Guard established the Maritime Oil-Spill Response Planning Advisory Group (MORPAG) to review management of alternatives and their incorporation into VRPs. The group consists of 20 members representing 13 Coast Guard Commands, all of which play a role in the management of alternatives and evaluation of response capability. The group recognizes that industry participation and support will be necessary for success and is therefore developing an engagement plan which will detail a strategic process to incorporate industry in a way that supports the interests of the Coast Guard, states, and industry stakeholders. Although formal integration of industry has not yet occurred, all group members are engaging informally with our Government and industry stakeholders during risk assessment discussions, VRP and APC reviews and Oil Spill Response Organizations (OSRO) performance assessment visits. In respect of this ongoing initiative, the Coast Guard is amending the acceptance period of current alternatives to allow their use for a maximum of 5 years from the most recent acceptance date in order to give the MORPAG time to complete its work.

As requested in your letter of February 4, 2021, this amendment also acknowledges the APC Administrator name change from Alaska Maritime Prevention & Response Network to Alaska Chadux Network. Please ensure your clients receive updated certificates reflecting this name change and advise them to include it in their annual VRP reviews.

Your clients who use this APC must keep a copy of this letter with their VRP onboard their vessel in addition to all other required documentation.

Vessel owners/operators using this APC as part of their VRP must continue to undertake the required annual reviews per 33 CFR 155.1070, including applicable APCs. They are encouraged to work with their APC Administrator to ensure this is done.

Please contact Mr. Chris Friese with any concerns or questions at christopher.r.friese@uscg.mil.

Sincerely,

A handwritten signature in blue ink, appearing to read "R. M. Alonso".

R. M. ALONSO
Captain, U. S. Coast Guard
Chief, Office of Marine Environmental Response Policy

Copy: CG PACAREA (3IM, 54)
CGD SEVENTEEN (dp, dr)
CG SECTOR Anchorage

U.S. Department of
Homeland Security

United States
Coast Guard



Commandant
United States Coast Guard

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16450

Alaska Maritime Prevention & Response Network
Attn: Mr. Buddy Custard
1400 West Benson Blvd
Suite 220
Anchorage, AK 99503

SEP 26 2019

Dear Mr. Custard:

The Coast Guard reviewed your Alaska Maritime Prevention & Response Network's (AMPRN's) Alternate Planning Criteria (APC) proposal for tank vessels carrying Groups II-V cargos, submitted on July 31, 2019 in accordance with Title 33, Code of Federal Regulations, Section 155.1065, for the Western Alaska (WAK) Captain of the Port (COTP) Zone.

The Coast Guard accepts your APC request, and your APC will take effect on October 1, 2019 and will remain valid until September 30, 2022. AMPRN's APC may be included in vessel response plans (VRPs) submitted for approval for operations in the WAK COTP Zone. Your clients must keep a copy of this APC attached to their respective VRPs, along with a copy of this letter onboard their vessels. Any deviation from the provisions in your APC must be communicated immediately in writing to the WAK COTP for reevaluation.

Between October 1, 2019 and September 30, 2022, you must meet bi-annually with the WAK COTP to continue progress with enhancing response capabilities and addressing gaps identified in AMPRN's APC. Details and expectations on the following must be coordinated with the WAK COTP:

- a. The milestones listed in AMPRN's APC Appendix L – Network APC Build-Out Accomplishments must be reviewed and evaluated by the WAK COTP. Prioritization of a build-out strategy must be given to highest risk vessels and operating areas. The Coast Guard recommends you consult with VRP plan holders and OSROs in developing this build-out strategy.
- b. Ensure vessels identified in the APC are available and capable and not limited by service, routes, or conditions if certificated by the USCG.
- c. Demonstrate to WAK COTP that the ship arrestor described in AMPRN's APC is functional as intended and planned.
- d. Continue improving capabilities for dispersant application in the pre-authorized areas of WAK in order to meet the planning requirements in 33 CFR Part 155.
- e. Propose a strategy to the WAK COTP for enhancing response capabilities in areas where vessels intend to operate while deviating from the routing procedures included in AMPRN's APC Appendix C – Prevention Strategies.

Continued improvements to the AMPRN APC towards meeting National Planning Criteria are imperative to retain acceptance. The Coast Guard expects for AMPRN to continue consultations with the Coast Guard, Area Committee, and plan holders on enhancing oil spill prevention and response readiness in Alaska. If the Coast Guard is not satisfied that adequate progress has been made towards addressing WAK COTP's concerns, this APC acceptance may be subject to cancellation. If this occurs, the Coast Guard will provide written notice to AMPRN. Additionally, if it is determined resources are available and capable of providing National Planning Criteria (NPC) for a vessel operating in any area covered by this acceptance, their VRP may not reference this APC and the plan holder must contract with resource providers able to meet their NPC requirements.

Questions concerning this letter may be directed to my VRP staff at vrp@uscg.mil.

Sincerely,



R. M. ALONSO
Captain, U.S. Coast Guard
Chief, Office of Marine Environmental Response Policy

Copy: CG PACAREA (35IM, 54)
CGD SEVENTEEN (dp, dr)
CG SECTOR Anchorage



16450
April 11, 2022

Alaska Chadux Network
Attn: Buddy Custard
2347 Azurite Court
Anchorage, AK 99507

Dear Mr. Custard:

Thank you for submitting the Alaska Chadux Network's (ACN) *Alternative Planning Criteria for Tank Vessels Carrying Groups I - V Oil as Cargo Operating in Prince William Sound COTP Zone (PWS-TV-APC-2021)* dated June 18, 2021. After reviewing your proposal and the Coast Guard (CG) Captain of the Port (COTP) Prince William Sound (PWS) endorsement, I find your APC acceptable for VRPs submitted for the applicable operating areas in PWS through **March 31, 2024**. Acceptance of this APC is limited to a geographic area inside the PWS COTP Zone between 50-200 nautical miles offshore and is contingent upon the following conditions:

- a. Vessel owner/operator (VO/O) must:
 - (1) Only transit this geographic area when it is necessary to avoid extreme weather. VO/O must notify ACN and the PWS COTP, through the CG Sector Anchorage Command Center, before entering the PWS COTP Zone.
 - (2) Only reference this APC in a VRP if the VO/O has a valid contract with a dispersant provider that is capable of providing the necessary capabilities required in Coast Guard regulations and pre-authorized areas within the PWS COTP Zone.
 - (3) Only reference this APC for a tank vessel operating in this area with planning volumes of 500,000 barrels or less. Vessels exceeding this planning volume are excluded from this APC and must be addressed through a distinct APC request made to the PWS COTP.
 - (4) Evaluate their vessels' planning criteria to verify if this APC is justified Title 33, Code of Federal Regulations, Part 155 with the assistance from ACN to ensure an accurate assessment. This evaluation must consider the smallest planning volume at which National Planning Criteria (NPC) is achievable to ensure vessels that can meet NPC are not allowed to use the APC.
 - (5) Vessel owners/operators must continue to undertake the required annual reviews per 33 CFR 155.1070 and coordinate with ACN to include an evaluation of this APC if it is part of their VRP to ensure the alternatives employed by this APC are reviewed annually.

- (6) Identify and contract with available oil-spill response resources before referencing this APC for VRP approval. VO/O should coordinate with ACN to evaluate all potential response resources prior to justifying the use of this APC. ACN may contract for these resources on behalf of a VO/O if that VO/O has authorized ACN to do so.

b. ACN must:

- (1) Collect data to document the location and operating status (available, not available) of each barge that is part of ACN's barge of opportunity network for required temporary storage. Only barges identified by contract or other approved means may be included in this network. In addition, ACN must evaluate this information annually to determine the reliability of required assets and must submit it to the CG COTP for subsequent APC renewals.
- (2) Consult the PWS FOSC and Area Committee regarding the build out of response capability in this operating area. This discussion should include an evaluation of existing response resources and the planning requirements of the vessels operating there. Build out strategies must be evaluated annually and addressed in future APC renewals.
- (3) Ensure vessels of opportunity identified in the APC are available and capable, and not limited by service, routes, or conditions if certificated by the USCG. This evaluation must be completed before the first annual review.
- (4) Test this APC prior to the first annual review along with a client's VRP exercise and do it annually thereafter in accordance with Title 33 CFR Part 155.1060(a)(a5).
- (5) Direct VO/Os to contact the PWS COTP, through the CG Sector Anchorage Command Center, before entering the PWS COTP Zone.
- (6) Meet with the PWS COTP annually as a condition of acceptance of this APC for VRP approval to evaluate the effectiveness and applicability of this APC. Items to be discussed include, but are not limited to:
 - i. Frequency of vessels transiting PWS COTP Zone as well as number of vessels seeking deviation from risk reduction routing measures due to severe weather.
 - ii. Reports on vessels not able to use this APC because either their planning volumes exceed the limit of the APC or they are able to achieve NPC without the APC.
 - iii. Evaluations of the barge of opportunity network required in paragraph (f) of this letter.
 - iv. Lessons learned from any annual drills and exercises.

- v. The build out plan, including input from the Area Committee as required in paragraph (g) of this letter.

This APC, along with a copy of this letter, must be kept with your respective client's VRP. Any deviation from the provisions of this APC must be communicated in writing to the Prince William Sound COTP for consideration. If it is determined that complying with a vessel's required national planning criteria is achievable in areas where this APC is accepted, use of this APC for VRP approval may be denied.

Questions concerning this letter may be directed to U. S. Coast Guard Sector Anchorage or Mr. Chris Friese at vrp@uscg.mil.

Sincerely,



Ricardo M. Alonso
Captain
Chief, Office of Marine Environmental Response Policy
U. S. Coast Guard

Copy: CG Pacific Area (PAC-35IM, PAC-54)
CG Seventeenth District (dp, dr)
CG Marine Safety Unit Valdez
CG Sector Anchorage