Salvage and Marine Firefighting Table Top & Equipment Deployment Exercises
FOR YEAR 2016

Fulfillment of PREP Guideline Sections 3.11, 3.12, & 3.15.
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To Our Clients

The New 2016 PREP Guidelines

The new Preparedness for Response Exercise Program (PREP) Guidelines became effective June 10, 2016. This is the third revision since August 1994 to the PREP Guidelines, when the U.S. Coast Guard first set out to design an effective and coordinated exercise program under the Oil Pollution Act of 1990 (OPA-90). The Coast Guard states that PREP will evolve as government and industry continue to meet the challenges of protecting public health, welfare, and the environment. We look forward to working with you, the client, to improve the PREP process for all involved.

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

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.

Salvage Management Team Table Top Exercise

The PREP Guidelines require all “Tank vessels and NTVs carrying oil as cargo or fuel” to complete “one salvage exercise per year” (See PREP, 3.11). The exercise may be initiated per company policy. As laid out in the Vessel Response Plan (VRP), the salvage
management team from the Plan Holder’s salvage provider, must participate in the exercise. The overall purpose of the Salvage TTX pursuant to PREP Guideline 3.11 is to “exercise the management team’s organization, communication, and decision-making in managing a salvage response.”

**Marine Firefighting Management Team Table Top Exercise**

The PREP Guidelines require all “Tank vessels and NTVs carrying oil as cargo or fuel” of 250 BBLs or more to complete “one MFF exercise per year.” (See PREP, 3.12) The exercise may be initiated per company policy. As laid out in the Vessel Response Plan (VRP), the MFF management team, including the company’s MFF provider, must participate in the exercise. The overall purpose of the Marine Firefighting TTX pursuant to PREP Guideline 3.12 is to “exercise the management team’s organization, communication, and decision-making in managing an MFF response.”
Applicability, Frequency, and Initiating Authority

- Shore-based Salvage Exercise: Tank vessels and NTVs carrying oil as cargo or fuel.
- Shore-based Marine Firefighting Exercise: 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 MMF exercise per year. The TTX is initiated by company policy, or via an actual response through Vessel Response Plan (VRP) Activation.

An Actual Response through VRP Activation

On Friday May 27th, the 833-foot U.S.-flagged freighter FREIGHTER #1, which had departed from Duluth bound for Conneaut, Ohio loaded with 45,000 LT of iron ore pellets, ran aground on Lake Superior in Whitefish Bay near Gros Cap Reefs, on the border between Canada and the United States.

The Vessel Response Plan, as required under the Oil Pollution Act of 1990 (OPA-90), was activated. Donjon-SMIT, the contracted Salvage and Marine Firefighting (SMFF) provider was notified by owners and quickly responded, dispatching local and cascade salvage team personnel and equipment. Donjon-SMIT and the owners agreed to a BIMCO WRECKHIRE 2010 contract as prescribed by the pre-established OPA-90 Salvage, Firefighting and Lightering Contract and Funding Agreement.
Participating Elements

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

J. Witte  S. Boudreaux
D. Martin  J. Erving
R. Fredricks  J. Meeberg
B. Meijering  J. Veen
T. Williamson  J. v.d. Lely
E. Crabtree  S. Kirsch
A. Gorter  J. Feld
J. Bek  J. Ireland
B. Neagele

Objectives

Exercise the Salvage and MFF management team’s organization, communication, and decision making in managing a salvage response as laid out 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 took place with the following key items and information completed and resultant. (Continued on next page.)
Summary of Response Activities and Actions

Date(s) Performed: 27 May 2016 through 15 June 2016

Initiation Time: May 27, 2016 at 0657 EST

Completion Time: June 15, 2016 at 2359 EST

Exercise or Actual Response: An actual response.

If an exercise, announced or unannounced: Not an exercise, and unannounced.

Location: Lake Superior in Whitefish Bay near Gros Cap Reefs, on the border between Canada and the United States; shipyard in Sturgeon Bay, Wisconsin

Response plan scenario used (check one):
- Hull Damage
- Machinery Damage
- Stranding or Grounding
- Collision
- Allision
- Stress Fractures
- Fire/Explosion

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

All parties involved with the response had a good comprehension of the contents of the VRP, from the plan holder to the SMFF and OSRO resource providers. Though the threat of a fuel oil spill was minimal and flooding on the vessel remained stable, there were pollution concerns due to local water intake stations. Boom had been deployed around the stern near the ship’s fuel tanks but strictly as a precautionary measure.

During the project, Donjon-SMIT worked in close coordination with the U.S. Coast Guard and local authorities. Under the Incident Command Structure, owners, the Qualified Individual (QI), Oil Spill Removal Organization (OSRO), and Donjon-SMIT swiftly undertook all necessary actions to mitigate any threats to the environment.

Donjon-SMIT utilized the on-file vessel pre-fire plan information to begin conducting a remote assessment and assessment of structural stability while requests for additional vessel drawings and diagrams were made.
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;
The owners gave notice to the U.S. Coast Guard and swiftly activated their response plan and salvage and MFF management team, their contracted Salvage and Marine Firefighting provider, Donjon-SMIT LLC. Steps were than immediately taken by the salvage and MFF management team to begin initializing a response.

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;
The incident command structure successfully executed internal and external communications by multiple methods. Communications within the Salvage and MFF management team and operations onboard the FREIGHTER #1 were executed as planned, with information flowing from the command post to the salvage team aboard the vessel and the reverse. Daily progress reports were produced by the Salvage and MFF management team regarding the salvage efforts, which were 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 agreed to a BIMCO WRECKHIRE 2010 contract. With the funding agreement 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.

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

From the onset of the activation of the response plan by the plan holder, salvage resources as identified by the SMFF regulations were engaged as needed. The salvage response was started with a Remote Assessment and Consultation by Richard Fredricks with Donjon-SMIT. A local Rapid Situation Assessor (from Donjon-SMIT’s RSA program) was immediately deployed and arrived on site in under a few hours to begin the onsite salvage assessment.

The salvage and dive team, led by Salvage Master Bart Meijering, conducted an extensive damage assessment of the fully laden vessel, surveying all tanks and holds. The structural and stability calculations revealed that the vessel was hard aground on rocky bottom, with six compartments damaged, four of which were breached and flooded. A salvage plan and lightering sequence were developed to safely refloat the vessel, at which point she could safely proceed to anchor and discharge her remaining cargo.

The ore carriers FREIGHTER #2 and FREIGHTER #3 were dispatched to the scene to lighter the FREIGHTER #1. The cargo transfer/lightering was done by the ship’s own means. During the lightering, ballast was taken to keep the vessel firmly aground. Once the required amount had been lightered, the FREIGHTER #1 was refloated in a controlled manner by pumping out the water ballast.

Because boom had been deployed around the stem near the ship’s fuel tanks as strictly a precautionary measure, operational challenges arose due to the necessity of having to move the boom to allow access to the vessel for salvage equipment deliveries and other salvage operational activities.
The vessel was completely lightered at a nearby anchorage, at which point a full hull and bottom survey was conducted. A transit plan was developed for the damaged vessel to proceed to a shipyard in Sturgeon Bay, Wisconsin. The salvage team remained onboard during transit to the shipyard.

With regards to Specialized Salvage Services as defined the SMFF regulations, such as a Special Salvage Operations Plan, Subsurface Product Removal, and Heavy Lift, only Heavy Lift was utilized (marine cranes) for deployment and staging of equipment. Personnel competent in Specialized Salvage Services were involved in the response as part of the SMFF management team.

Shore-based Marine Firefighting 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 the FREIGHTER #1 response. Cross trained personnel for both salvage and MFF services conducted the remote assessment and consultation, an on-site assessment, and the salvage team was comprised of marine firefighting trained personnel. External vessel firefighting systems are identified in the location specific SMFF Geographic Specific Annexes (incorporated by reference into VRPs), which were referenced during the incident to determine response equipment to be deployed for this case. The external vessel firefighting systems are co-located in the same warehouses that supplied salvage response equipment such as dive gear.

**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 response, local, national and international team members were deployed.
The SMFF management team integrated within the IMT during the incident from the early moments of activation. 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 pollution contingency plans, SMFF response tactics, 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
- Transit Plan

The below is an excerpt of the review and comment sheet for ‘Salvage Plan Rev2’ by the IMT:
H. Ability to access information in the ACP for resources available in the area, unique conditions of the area, etc.

The Area Contingency Plan was heavily utilized to identify sensitive nearby locations and develop an environmental protection plan. The following areas of concern were identified:

- Whitefish Bay ecological area, and
- Water intake for Sault Ste. Marie (Ontario) was within 0.8 miles of the vessel.

The USCG’s main concerns were the 133,000/G of bunkers onboard, ensuring the fuel did not reach the environment, and if they did, it would be contained. Transfer of fuel to another vessel was seen as adding additional risk, and lightering bunkers would impair the re-floating operations, as the bow would be forced further downward as the stern rises with the removal of fuel.

Given the concerns, a vessel and a barge were stationed adjacent to the FREIGHTER #1 to quickly deploy oil spill response equipment should it have been needed. 800 feet of containment boom were onboard.

Recommendations/Comments

Overall, the response was executed very well by all parties. It was a multi-faceted response and the communications and coordination that occurred between the vessel owner/operator, QI, USCG, Transport Canada, SMFF provider, OSRO and other members of the response community resulted in an efficient and effective response with zero damage to the environment. The comprehensive response effort was executed as prescribed by the vessel response plan and the appropriate emergency procedures, in an ICS-based incident response structure.

There were some initial issues with regards to notification via Donjon-SMIT’s 24-hour number, but contact and notification were able to be made through backup contact numbers located in the VRP and Donjon-
SMIT’s response guidebook respectively. The technical issues regarding the 24-hour number have subsequently been addressed.

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 time in addition to resources.

Conclusions
Donjon-SMIT was involved in several responses in varying Captain of the Port Zones in the U.S. during 2016. This response was unique for the year because the incident occurred on the U.S. and Canadian border on Lake Superior, making it an international response with potential pollution implications impacting both countries. The robust response initiated by the owner and operator resulted in a timely resolution to the situation and ultimately the protection of the environment and by extension local natural resources.

This report confirms that Donjon-SMIT (as the Salvage and Marine Firefighting Management Team) and by extension it’s 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 response to the FREIGHTER #1, and the utilization of Donjon-SMIT as the Salvage and Marine Firefighting Management Team, have been helpful. If you have any questions, please don’t hesitate to contact us.
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:


Fulfilled by: ☐ IMT TTX ☒ RACE ☒ This Exercise ☐ Not Met ☐ N/A
Checklist: Salvage Management Team Table Top Exercise Objectives Tested

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

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

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

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

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

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

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

Fulfilled by: ☐ IMT TTX ☐ RACE ☒ This Exercise ☐ Not Met ☐ N/A
Checklist: Salvage Management Team Table Top Exercise Objectives Tested

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

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

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

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


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


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


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
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 2016 PREP Equipment Deployment Summary Report

Please find below the Donjon-SMIT 2016 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 2016 calendar year, the beginning of a new 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 if 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 2016

<table>
<thead>
<tr>
<th>COTP Zone</th>
<th>Date</th>
<th>Location</th>
<th>Actual Response</th>
<th>Exercise</th>
<th>Anchored</th>
<th>Unmanned</th>
<th>Equipment Deployed</th>
<th>Pier</th>
<th>Nearshore</th>
<th>Offshore</th>
<th>Other</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>District 5</strong></td>
<td>10/23/2016</td>
<td>Delaware Bay near Marcus Hook Anchorage - Fouled had fouled anchor</td>
<td>Delaware Bay</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td></td>
<td></td>
<td>1</td>
</tr>
<tr>
<td><strong>District 8</strong></td>
<td>1/16/2016</td>
<td>Anchored at the Wills Point anchorage South of Belle Chase, Louisiana (hydraulic anchor windlasses had failed)</td>
<td>New Orleans</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td></td>
<td>1</td>
</tr>
<tr>
<td><strong>District 9</strong></td>
<td>27 May 2016 - 15 June 2016</td>
<td>Lake Superior in Whitefish Bay near Gros Cap Reefs, on the border between Canada and the United States; shipyard in Sturgeon Bay, Wisconsin</td>
<td>Lake Michigan</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td><strong>District 13</strong></td>
<td>27 May 2016 - 15 June 2016</td>
<td>Lake Superior in Whitefish Bay near Gros Cap Reefs, on the border between Canada and the United States; shipyard in Sturgeon Bay, Wisconsin</td>
<td>Sault Ste Marie</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td><strong>Columbia River (Portland OR)</strong></td>
<td>3/21/2016</td>
<td>Grounding, Damage, and Temporary Repairs</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>1</td>
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</tr>
</tbody>
</table>
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:

<table>
<thead>
<tr>
<th>Personnel Type</th>
<th>Announced Rate</th>
<th>Unannounced Rate</th>
</tr>
</thead>
<tbody>
<tr>
<td>Salvage Master</td>
<td>$676</td>
<td>Surcharge 2x</td>
</tr>
<tr>
<td>Naval Architect or Salvage Officer/Engineer</td>
<td>$564</td>
<td>Surcharge 2x</td>
</tr>
<tr>
<td>Assistant Salvage Officer/Engineer, or Contracts Mgr.</td>
<td>$452</td>
<td>Surcharge 2x</td>
</tr>
<tr>
<td>Specialist Advisors – Fire Fighters, Chemicals, Pollution</td>
<td>$454</td>
<td>Surcharge 2x</td>
</tr>
</tbody>
</table>

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 utilize personnel 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.)

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

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

Participation in Other Exercises

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

Date: December 1, 2016

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 2016. 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 start of a new triennial cycle.

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 a 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 2016, 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
Donjon-SMIT LLC
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