U.S. Department of Homeland Security

United States Coast Guard



Commandant United States Coast Guard 2100 Second Street, S.W. Washington, D.C. 20593-0001 Staff Symbol: G-MOR-2 Phone: (202) 267-6714 FAX: (202) 267-4065

16460/23 December 13, 2002

Dear Vessel Response Plan Manager:

I am writing to inform you of anticipated delays in the Vessel Response Plan (VRP) resubmission, review, and approval process. Please be aware that a large number of plans are expiring within the next calendar year. This increase will result in a longer plan review process (including standard revisions, added vessels and zones, as well as SOPEP reviews). According to Title 33, Code of Federal Regulation, Part 155.1070(b)(1), plans must be resubmitted six months before the end of the Coast Guard approval period. The six month period between your required resubmission date and your plan's expiration date has been established to ensure that your plan is reviewed and you are allowed adequate time to respond with any necessary revisions. Over the past several years, the enforcement of this time submission has not been critical because our plan review system was sized to handle the number of plans received. Unfortunately, this year, given our increased workload and manning restraints, we must place renewed emphasis on submission times in order to meet regulatory obligations.

Beware that operating authority under your currently approved plan can not be extended beyond your plan's expiration date. Therefore, late plan resubmissions are done at the risk of incurring an interruption in your vessel's operations. Plans that have not been resubmitted and approved by their expiration date will result in vessels losing their authority to handle, store, transport, transfer, or lighter oil in areas subject to the jurisdiction of the United States. Additionally, requests for any expedited reviews will be granted only in extreme cases, with a written explanation why an expedited review should be granted.

Despite these foreseen challenges, this office remains committed to expeditious plan reviews. Toward this end, we offer these suggestions to minimize review delays:

- 1. Check VRP status on the website at <u>www.e-vrp.com</u> first.
- 2. If the website does not answer the question call the Status Line at (202) 267-0434. We will reply to your message requests via facsimile within one working day of our receipt.
- 3. Use the attached list of "Top Ten VRP Errors" to improve your initial plan submissions.

We look forward to working with you and providing the high level of service you deserve. Please address questions or concerns regarding this matter to me or Petty Officer Greg Becker at the above address or telephone number.

Sincerely,

S. R. KLEIN Lieutenant Commander, U. S. Coast Guard Manager, Vessel Response Plan Program By direction of the Commandant