

# *Identifying & Bridging Gaps in OPA 90 Response Execution – A QI's Perspective*

Gallagher Marine Systems - Tom Wiker

# Agenda

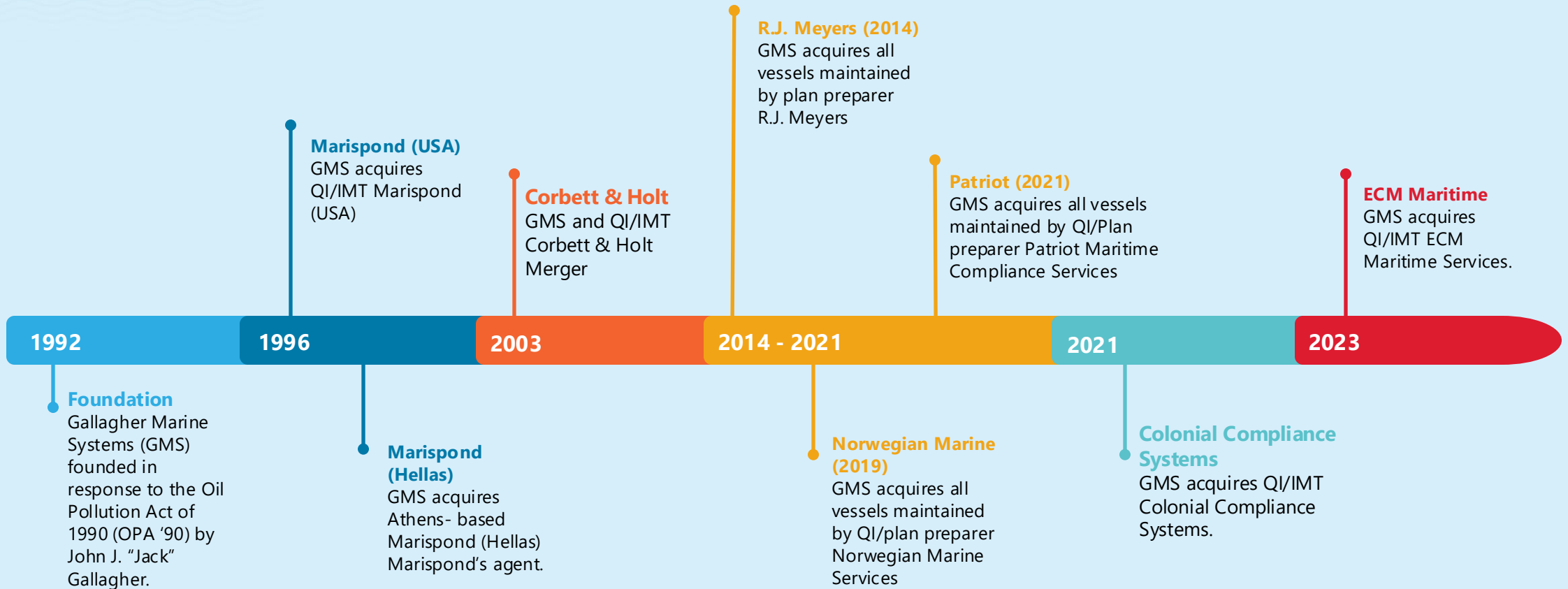
- Brief overview of GMS
- Changing of the Old Guard – Replacing legacy knowledge
  - Challenges
- Difficulties in staffing jobs qualified OSRO personnel
  - Remedies
- Regulatory Challenges - Experience
- Industry Challenges – GMS Auditing Tips
- Open Forum

# Gallagher Marine Systems - Overview



**We are** the most comprehensive source  
of full-service compliance support

# Since the Beginning



# Meet Your Team

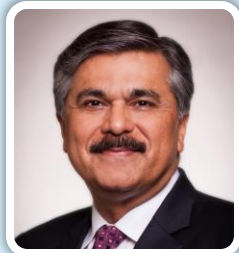
Get to know Gallagher Marine Systems' Leadership team.



**Thomas J. Wiker**  
President



**Viraf Ranji**  
CFO



**Kuldeep Singh**  
Senior Vice President  
Technical Services



**Scott May**  
Senior Vice President  
Planning



**Nishit Kapoor**  
Senior Vice President  
Operations & Corporate Risk



**Kevin Perry**  
Vice President  
Emergency Management



**Andrea Presutti**  
Vice President  
Quality & Compliance

Learn more about our [office locations, leadership and international offices](#)



# GMS Location

Headquarters in Moorestown, NJ

Representation throughout the US  
and US territories

70+ employees and 10 retained  
associates



# US Office & Support Locations

- **GMS Main Office (Headquarters) – 1.5 hours south of New York City and 30 minutes east of Philadelphia**

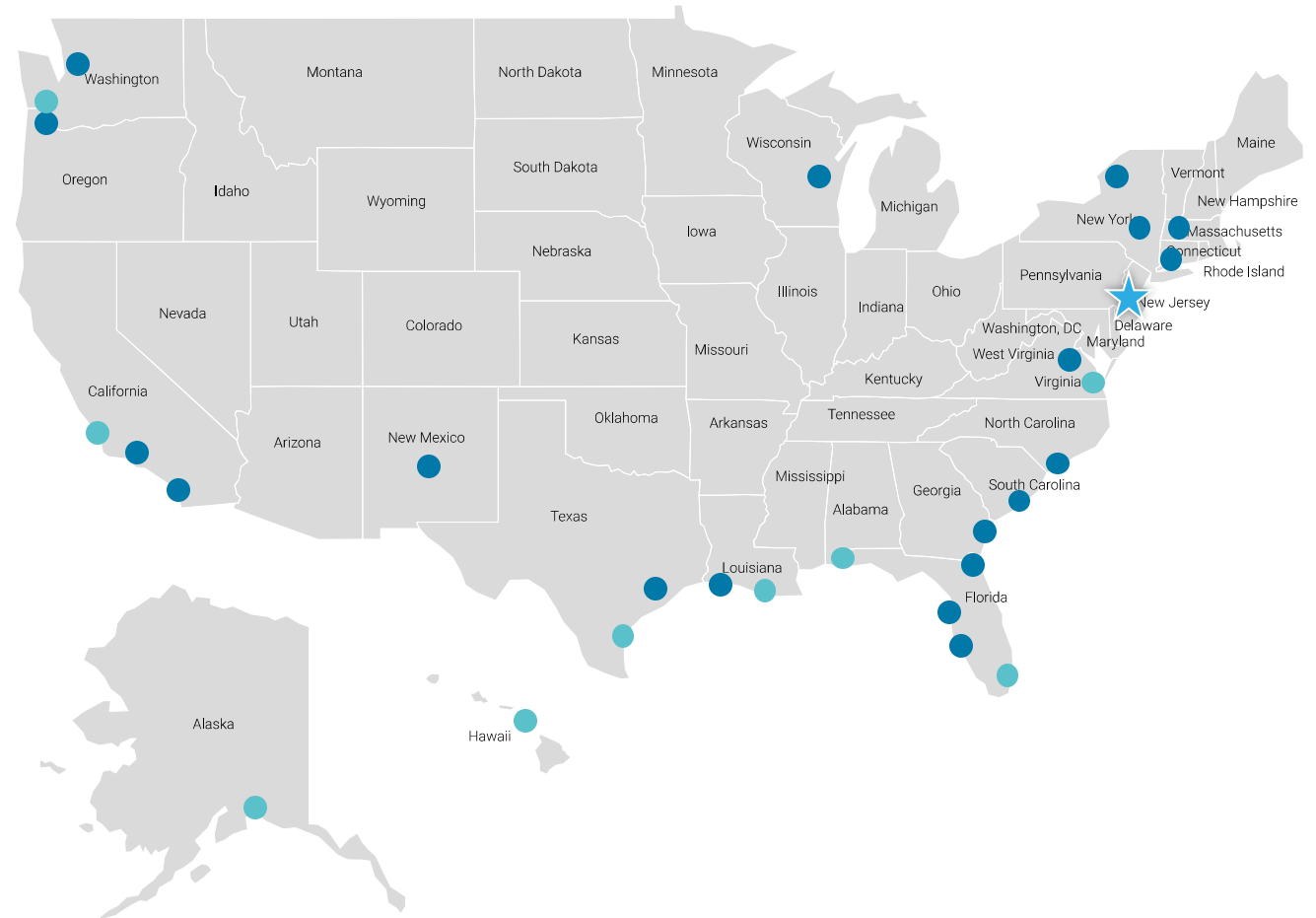
★ Moorestown, New Jersey

- **GMS Employees**

- Connecticut
- Massachusetts
- New York
- Virginia
- North Carolina
- South Carolina
- Georgia
- Florida
- Louisiana
- Wisconsin
- Texas
- New Mexico
- California
- Oregon
- Washington

- **GMS Associates**

- Virginia
- Florida
- Alabama
- Louisiana
- Texas
- California
- Washington
- Alaska
- Hawaii



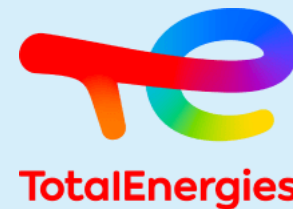
# Corporate Offices and Partners



# GMS Clients

- Shipowners and Ship Managers
  - Over 1,100 clients representing more than 10,500 ships globally
- Oil Majors, Energy, Pipeline, Charterers, and Cargo Owners
- Representing nearly 150 facilities throughout the USA

## Some Examples of Who we work with



# ALASKA PARTNERS



# Some of our Blue Water Partners

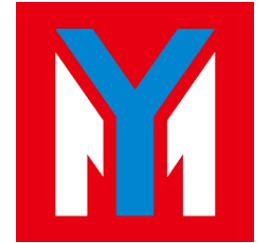
**FAIRWATER** >



**MÆRSK**



EXECUTIVE SHIP MANAGEMENT



oldendorff 



**K"K" LINE**  
KAWASAKI KISEN KAISHA, LTD.



ANGLO-EASTERN



NYK SHIPMANAGEMENT



 OSM Thome

 TORM

 seaspan

 Carnival



 HÖEGH AUTOLINERS



BRIESE SCHIFFFAHRT

 EURONAV

 Disney CRUISE LINE



# Some of our Brown Water Partners



GREAT LAKES  
DREDGE & DOCK  
COMPANY, LLC



# Our Services

Qualified Individual

Incident Management Team

Contingency Plan  
Development & Maintenance

Drills & Training

Technical Services

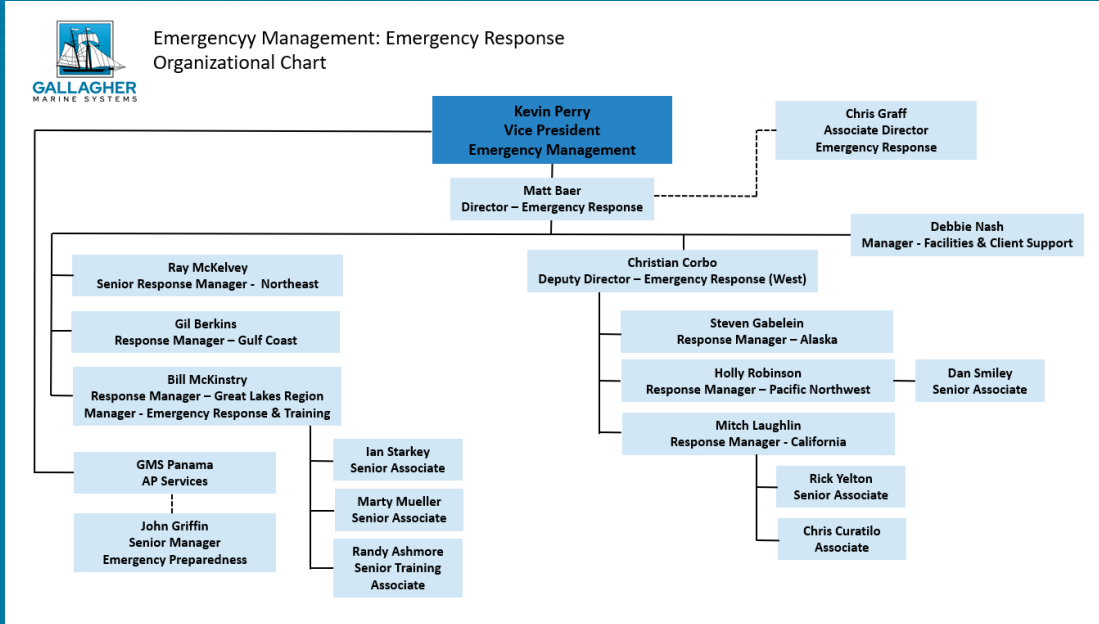


# Emergency Management Overview

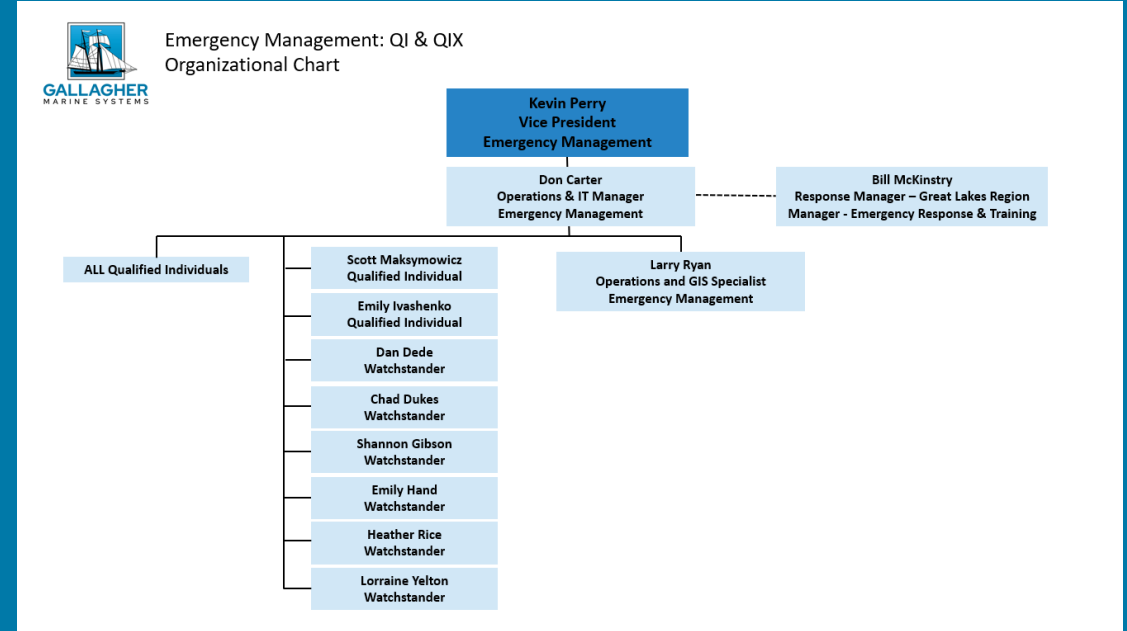
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# Emergency Management

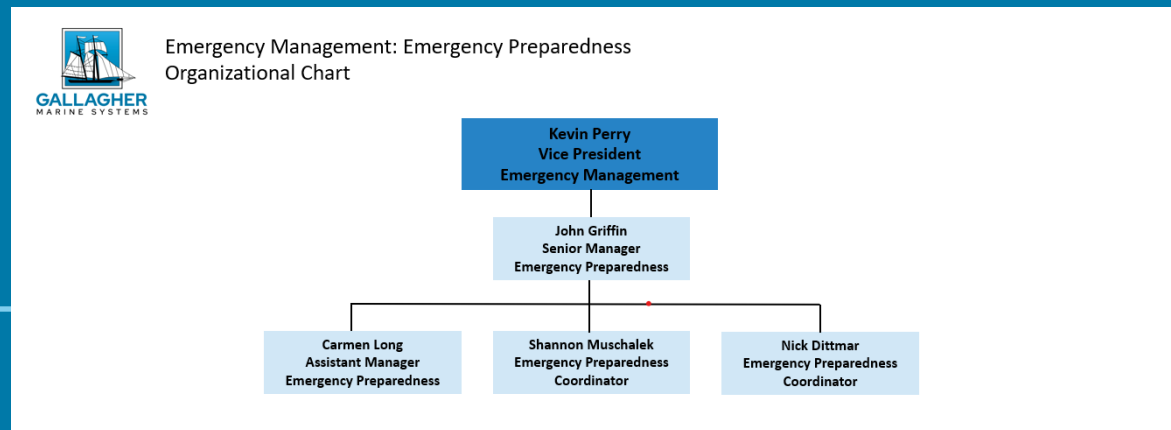
## Emergency Response



## QI & QIX

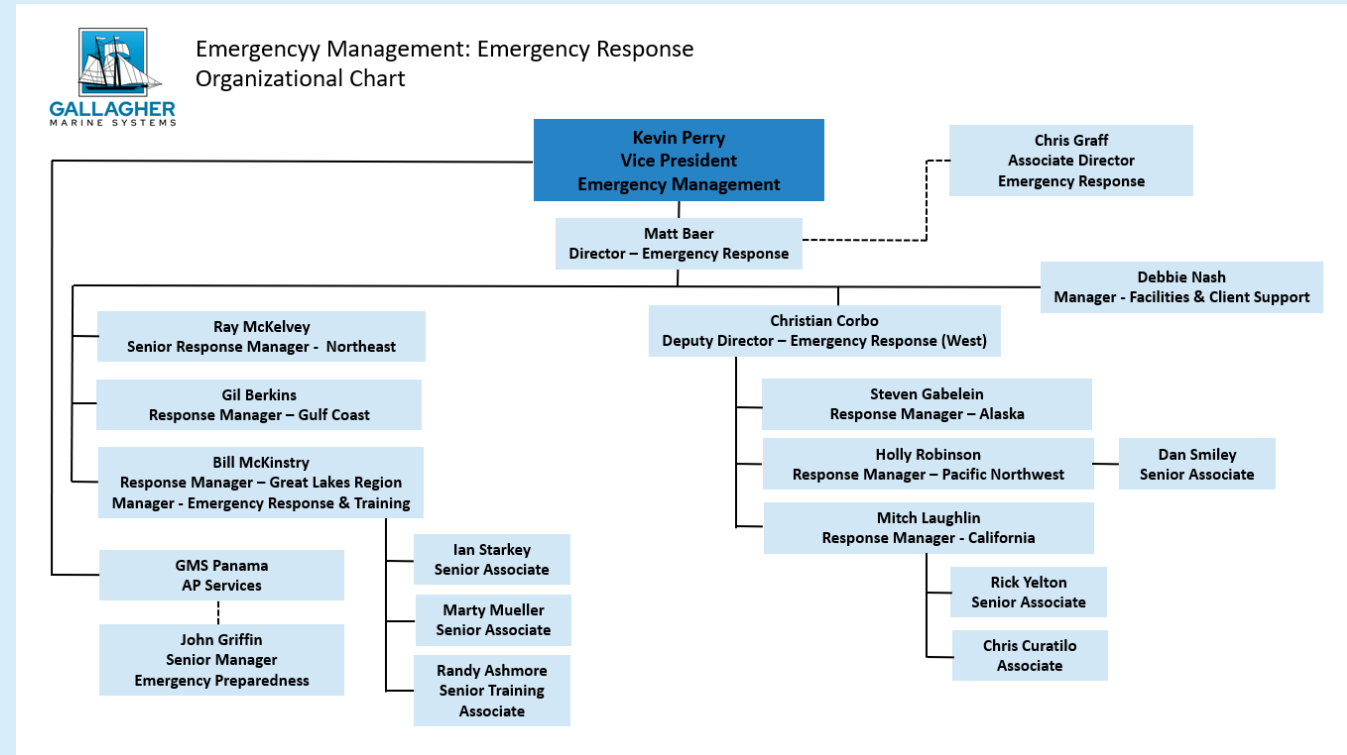


## Emergency Preparedness



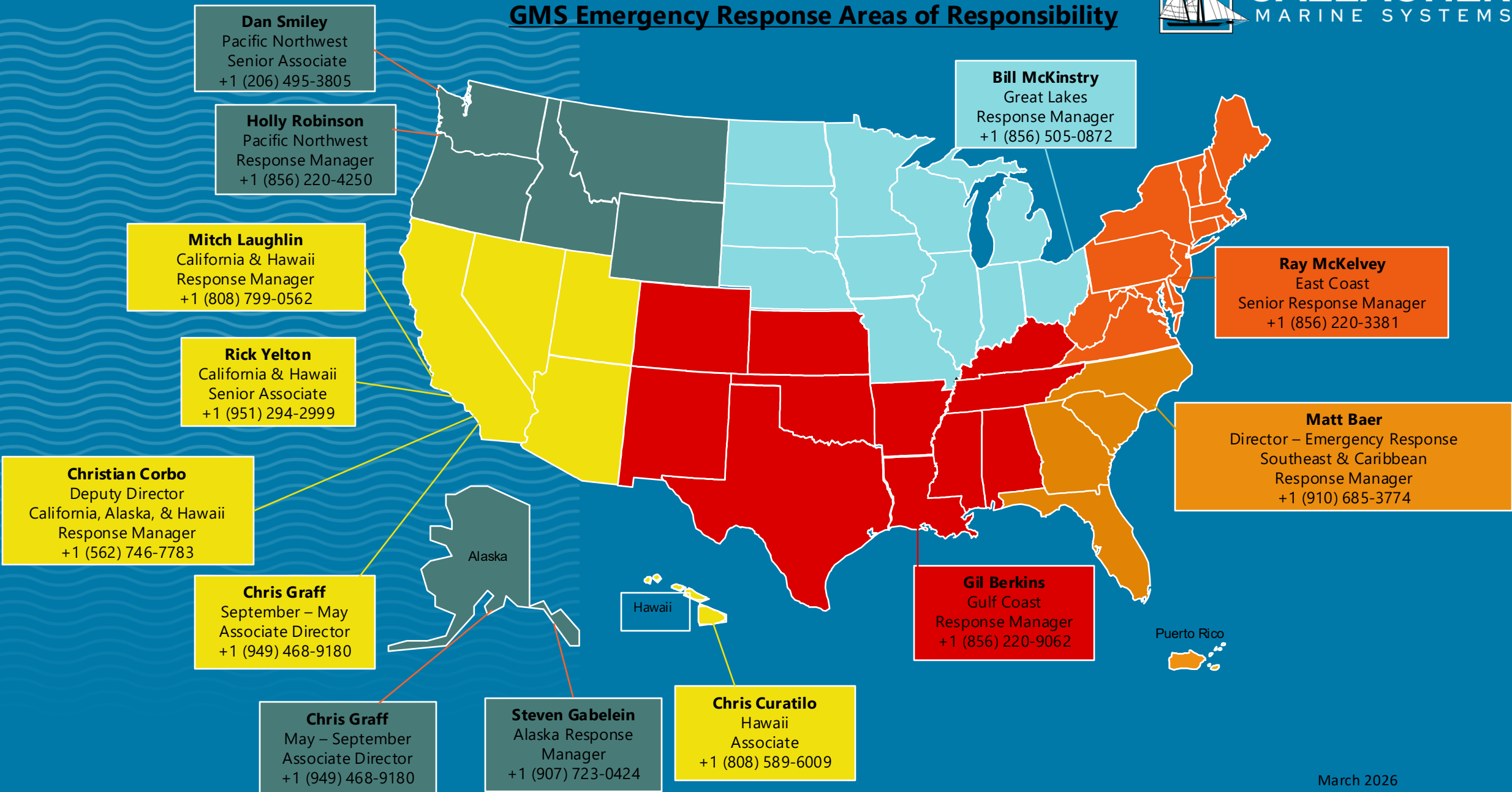
# Emergency Management

- Emergency Response is our dedicated QI/ER Department.
- QI Watchstander is first point of intake for an incident.
- Country is geographically divided amongst our Response Managers (RM)
  - RM's are your touch point at GMS
  - Recommend you take a pic of the following slide...





## GMS Emergency Response Areas of Responsibility



# GMS IMT/SMT Overview

**Areas, beyond USCG requirements, where the GMS IMT/SMT is approved/qualified to provide services:**

## Alaska

Response Plan  
Facilitator and AK IMT

## California

1<sup>st</sup> SMT to receive approval  
Already completed 2<sup>nd</sup>  
compliant CA OSPR TRIVEX

## Washington

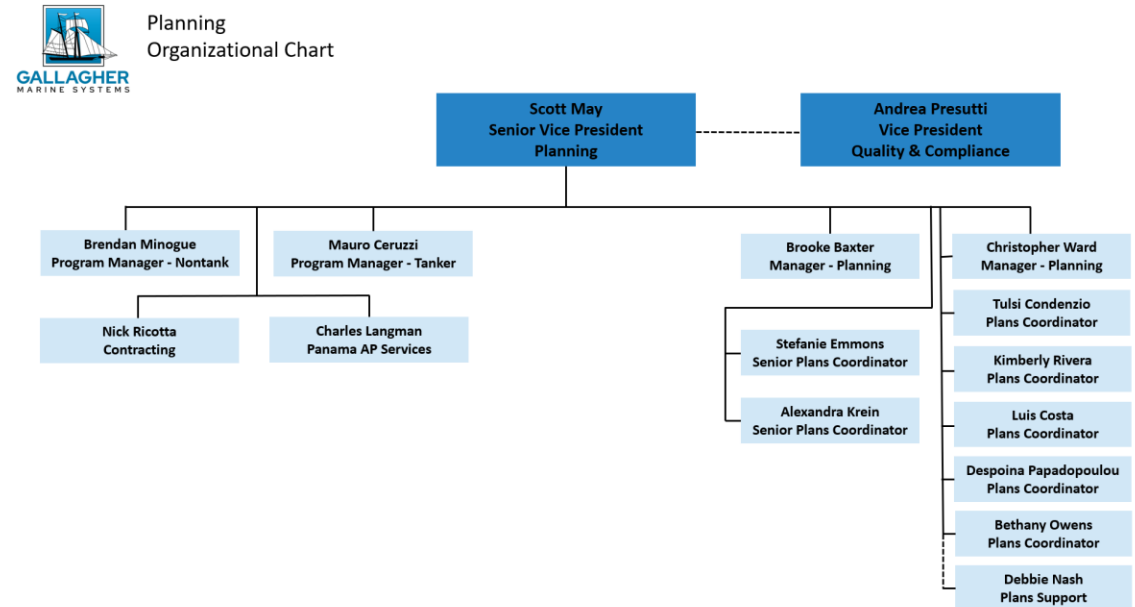
1<sup>st</sup> SMT to receive  
approval  
WSMC Backup SMT

# Contingency Plans

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# GMS Client Portfolio & Service Approach

- Over 1,100 active planholders and growing, across the globe
- Maintains
  - 1,200+ Federal Plans (VRP/NTVRP)
  - 500+ California Plans (CCP/CANT)
  - 4,700+ Vessels (PCSOPEP)
  - 4,800+ Vessels (NOI/VGP)



- Requests are processed on or before assigned due date.
- Assigned to GMS Plans Coordinator follows systematic protocols to execute requests.
- Upon submission to regulatory authorities, finalized revisions are delivered to Planholder (typically via GMS Client Portal or email).

# Technical Services

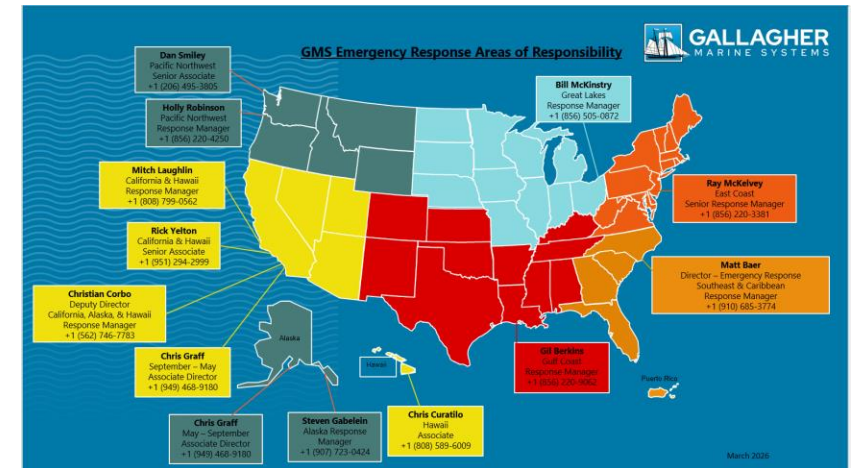


- Average just under 800 vessel attendances/year
- Subchapter M auditing services
- ISPS/MTSA (Security) related plans and Drills (TTXs)
- Technical Support – ISO Standard 17021:2015 Accredited
  - Vessel Attendance
    - USCG Inspections
    - Pre-inspections (Pre-USCG Inspections)
    - Audits/Vetting's (Including subchapter m)
    - Crew Training
  - Client and Vessel Compliance Support
    - Regulatory Interpretation/Consulting
    - Interaction with USCG/Other Authorities
    - Risk Assessments
    - Root Cause Analysis
- Environmental Compliance Program Audits (MARPOL)
  - DOJ appointed and Voluntary
  - Service provided since earliest prosecutions
    - Independent auditors
    - Third party auditors
    - Court-appointed auditors

# Identifying & Bridging Gaps...

# Changing of the Old Guard – Replacing legacy knowledge - Challenges in the QI Industry where incidents are concerned

- Loss of knowledge and experience through retirement and even passing.
  - Impacts to GMS...loss of incident response knowledge
  - Replacement is highly competitive
  - Need for practical understanding of incident management



- How do you replace the loss of knowledge?
  - Hire well trained Coasties. This has a negative impact on the USCG as a limited number of trained personnel exit for industry.
  - Via clients – former Masters & C/E and other officers
  - Other – challenges to find young people willing to do the job we do...

# Difficulties Staffing Jobs with “Qualified” OSRO Personnel

- As the RP representatives, we find reoccurring challenges:
  - Inadequate number of personnel
  - Inadequate number of TRAINED personnel
  - Shortfalls in equipment availability
- We understand these challenges but need to know from the outset
  - Communicate openly with us from the beginning to detail shortfalls

Building a foundation and relationships...together

- GMS has been doing outreach with some OSROs to flush out concerns, needs and challenges.
  - We ask that you reach out to setup a virtual meeting w/ our Regional RMs.
  - Understand GMS while we learn more about your capabilities and challenges

# Experience - Regulatory Challenges

- Incidents aren't happening as often as they once did.
- Challenges encountered with the USCG where there is a lack of training/understanding of our and other's roles, a reluctance to make decisions, etc.
  - Focus on IAP production and ICS processing efficiencies
  - Lack of field response experience
  - Not understanding roles and experience of our industry
  - Results: Unnecessary delay in vessel departures, over responding, reluctance to make decisions in fear of outcome, rightsizing reluctance, etc.
- Experience is at a premium; inexperience is at a peak!
- GMS continuously does regulatory outreach
  - QI Course – USCG & States regularly attend w/ our clients
  - Seminars – invitations & exposure
  - ACP & RRT meetings – present our perspectives when possible
  - Training – Sending our personnel to work w/ regulatory bodies where possible
  - Hosting USCG – Mike Goglia, among others, have spent time with our team

# Industry Incident Response Challenges

## SOME Auditing Tips

- Meet with the GMS Finance Section early on to establish payment terms
  - GMS Internal - *GMS PRACTICES & PROCEDURES OF FINANCE SECTION*
  - GMS Shared – *Submission of Daily Field & Cost Reports*
  - Disclose third party subcontractors to the GMS Finance Section Chief
- Establish T&M review and submission terms
  - Connect w/ GMS Division Supervisor to establish understanding
  - Establish supporting documentation (211s, GMS countersigned Dailies, etc.)
- Other – Your thoughts for GMS?

The image shows two screenshots of GMS forms. The left screenshot is titled "PROCEDURES FOR SUBMISSION AND REVIEW OF DAILY FIELD AND COST REPORTS" and includes sections for "GENERAL INFORMATION" (Date, To: All Response Contractors and Vendors, From, Incident) and a "PROCEDURE CHECKLIST" with items 1.0 through 2.5.1. The right screenshot is titled "Daily Summary of Charges" and includes a checklist of items 3.0 through 3.5, followed by an "Acknowledgment" section with fields for Signature, Name, Title, Company, and Date. Both forms have a footer with GMS contact information and office locations.

Questions / Thank you!