



COMMANDANT (CG-MER-1)  
ATTN VESSEL RESPONSE PLAN PROGRAM  
US COAST GUARD STOP 7516  
2703 MARTIN LUTHER KING JR AVE SE  
WASHINGTON DC 20593-7516

To Whom It May Concern,

I, [REDACTED], certify that this submission meets all applicable requirements set forth in Title 33 CFR 155 and Title 33 U.S.C. 1321(j)(5) and that I have identified and ensured the availability of, through contract or other approved means, the necessary private resources to respond to the maximum extent practical, a worst case discharge or a substantial threat of such a discharge from the vessels.

Sincerely,

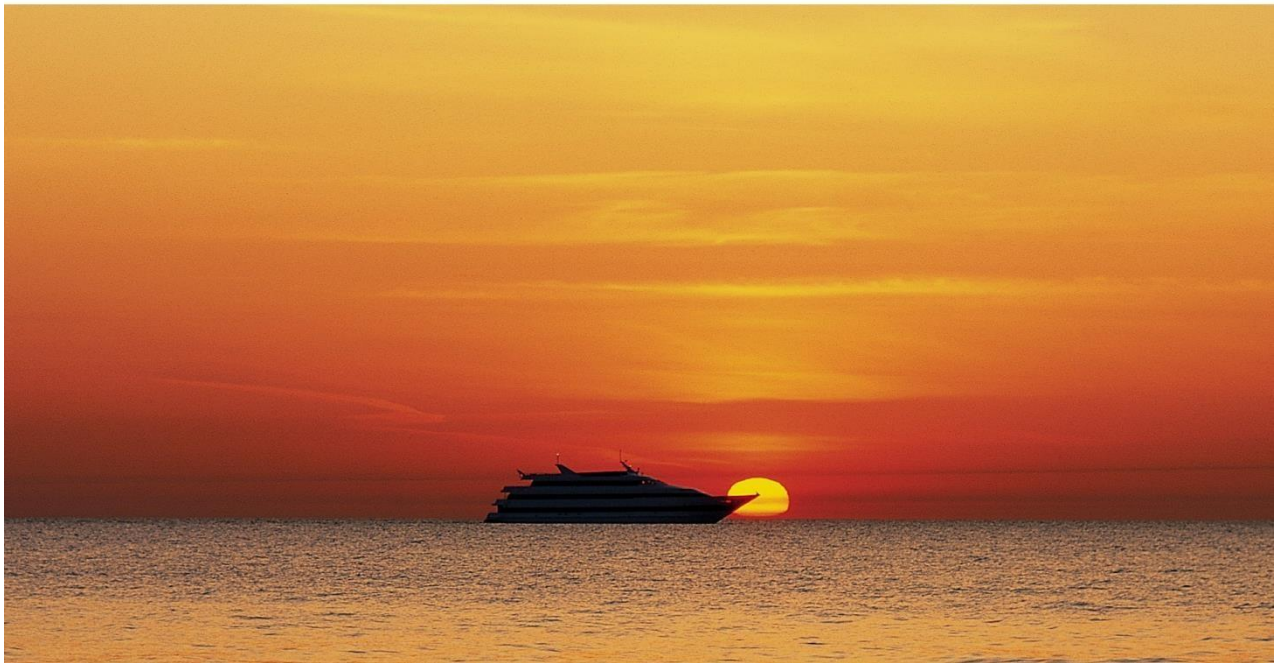
[REDACTED]

National Director of Marine Operations  
Entertainment Cruises a Hornblower Company  
211 N. Union Street Suite 301  
Alexandria, VA 22314

[REDACTED]

# Entertainment Cruises, Inc.

## Fleet Non-Tank Vessel Response Plan



Entertainment Cruises, by Hornblower Events  
and Cruises. – Vessel Operations

*Mystic Blue Cruises*  
*Premier Yachts Inc.*  
*Seadog Ventures*  
*Spirit Cruises LLC*

# TABLE OF CONTENTS

<b>Section &amp; Title</b>	<b>Page</b>
<b>1) General Information &amp; Operational Overview .....</b>	<b>2</b>
<b>a) Vessels Subject to Plan .....</b>	<b>4</b>
<b>b) Vessel &amp; Dock Locations .....</b>	<b>5</b>
<b>2) Notification Procedures .....</b>	<b>6</b>
<b>a) Oil Spill Notification – External Calls .....</b>	<b>6</b>
<b>b) Entertainment Cruises Internal Notification Procedures .....</b>	<b>7</b>
<b>c) Information to be Provided .....</b>	<b>8</b>
<b>3) Shipboard Spill Mitigation .....</b>	<b>8</b>
<b>a) Crew Duties .....</b>	
<b>b) Steps to Prevent or Control a Discharge .....</b>	<b>9</b>
<b>c) Oil Spill/Emergency Procedures .....</b>	<b>10</b>
<b>d) Damage Stability .....</b>	<b>11</b>
<b>4) Shore Based Response .....</b>	<b>12</b>
<b>a) Responsibilities .....</b>	<b>12</b>
<b>b) Consistency with Area Contingency Plan (ACP) .....</b>	<b>14</b>
<b>5) Contact Information .....</b>	<b>15</b>
<b>a) City Emergency Contact List .....</b>	
<b>b) OSRO, Salvage &amp; Marine Firefighting .....</b>	
<b>c) Entertainment Cruises Management Contact List .....</b>	
<b>6) Training Procedures .....</b>	<b>17</b>
<b>7) Exercise Procedures .....</b>	<b>20</b>
<b>8) Plan Review &amp; Update .....</b>	<b>21</b>

## **Appendices**

- 1) Geographic & Vessel Specific Information for COTP Zones**
- 2) Basic Emergency Action Checklist**
- 3) Fuel Oil Transfer Procedures**
- 4) Incident Reporting Form for National Response Center**
- 5) Changes and Revisions Form**
- 6) Vessel Drawings**
- 7) Proof of Oil Spill Response Organization & SMFF Provider**
  - a. Water Quality Insurance Syndicate**
  - b. OSRO Clean Harbors Environmental**
  - c. Ardent, LLC**

### **1) General Information**

This Non-Tank Vessel Response Plan is submitted by Entertainment Cruises, Inc. for the vessels in the fleet that are greater than or equal to 400 Gross ITC Tons and are subject to 33CFR Parts 151,155 and 160, Non-Tank Vessel Response Plan.

The Entertainment Cruises Fleet consists of 42 vessels in United States, 9 of which are deemed to be subject to the Non-Tank Vessel Response Plan (greater than or equal to 400 Gross Tons ITC). These vessels are all US Coast Guard inspected passenger vessels and carry no cargo. All of the vessels in the fleet burn No. 2 Diesel for fuel. All vessels have a fuel capacity of less than 250 barrels with the average fuel capacity of 7,116 gallons.

This plan is designed to provide the Vessel Master & Crew with the appropriate information to prevent a spill or to mitigate the consequences if a spill does occur. In addition to this the plan is designed to ensure compliance with the applicable regulatory requirements for vessels in the Entertainment Cruises, Inc. fleet.

This plan has been submitted to the Coast Guard. No alteration or revision shall be made to any part of the plan without a review and revision at the corporate level. Changes shall be noted on the changes/revisions page. The plan will be audited for effectiveness and comprehensiveness annually and will be revised and resubmitted as necessary as improvements are identified.

### **CONCEPT OF ENTERTAINMENT CRUISES OPERATIONS**

The Entertainment Cruises fleet is comprised of several different operational brands of passenger vessels conducting harbor dining, sightseeing cruises and private charters in multiple US cities. All Entertainment Cruises vessels located in the United States are certificated and inspected by U.S. Coast Guard and operate in compliance with all

Entertainment Cruises, Inc. Non-Tank Vessel Response Plan

applicable federal, state, and local laws. Entertainment Cruises vessels operate cruises of a short duration, typically less than 4 hours with the majority boarding & disembarking from the same dock. There are no overnight cruise vessels or operations in the Entertainment Cruises fleet currently. The vessels range in size from seventy to two hundred thirty feet in length and have a passenger capacity range from 150 to 850.

The Entertainment Cruises, Inc. brands are:

- Spirit Cruises: provides casual, entertainment focused, dining and sightseeing cruises in Boston, Chicago, New Jersey, New York, Norfolk, Philadelphia, Baltimore and Washington D.C.
- Odyssey Cruises: sophisticated fine dining cruises with professional live entertainment in Boston, Chicago, and Washington D.C.
- Bateaux New York: fine dining with professional and classic service aboard a French inspired glass enclosed vessel with unparalleled views of the New York City skyline.
- Mystic Blue Cruises: casual, contemporary, and fun dining and sightseeing cruises in Chicago.
- Elite Yacht Charters: high end yacht quality cruise with a focus on elegance, food quality, superior service, and privacy in Boston, Philadelphia, New York, Norfolk and Washington D.C. (none of the Elite vessels are subject to the NTVRP)
- Seadog Cruises: high energy sightseeing cruises in a single deck open top speedboat with operations in Chicago, IL. (None of the Seadog Ventures vessels are subject to the NTVRP)
- Potomac Riverboat Company: Sightseeing, Charter, and Water Taxi operations. (None of the PRC fleet are subject to the NTVRP).

**Entertainment Cruises Structure:**

- Local operations are typically comprised of Administrative and Sales Department functions that are office based, along with a vessel component, comprised of the marine and restaurant departments. The marine department operates the vessels in compliance with U.S. Coast Guard regulations, maintains the operational aspects of the vessel, and acts as first responder in emergency situations. The restaurant department operates the food & beverage and entertainment elements of cruises and provides a support role to the marine department during onboard emergency situations.
- Corporate functions are headquartered in Chicago; department specific corporate vice-presidents provide national leadership, compliance oversight, support, and formulate policy and strategy.

### **Hazardous Vapor Release**

- None of the EC vessels carry substances that would generate hazardous vapor release.
- In the event that the vessel encountered an area with hazardous vapors, maneuver vessel upwind to avoid vapors.
- Sound emergency alarm.
- Shut down outside air to the accommodation spaces.
  
- Use Emergency Escape Breathing Devices (EEBD) or Self Contained Breathing Apparatus (SCBA) to protect personnel if they are exposed to hazardous vapors.

### **Lightering the Vessel**

- The priority in most instances would be removal of weight up high on the vessel, evacuate passengers if applicable
- Fuel on EC vessels is all carried below deck. If removal of fuel is deemed necessary, remove the fuel to a storage facility, truck or another vessel
- Pump off potable water
- Empty sewage tanks by pumping to an approved shoreside connection or waste removal truck

### **3(d) Damage Stability**

- **Vessels General Arrangement Plan, Midships Section Plan, Fuel Piping Diagrams and pumping plans as well as damage stability & residual strength calculations for each vessel are located in:**
  - **Shoreside in the company office for each city – address is listed in company contact information**
  - **Onboard the vessel in the pilothouse**
  - **Naval Architect Firm**
    - Dejong & Lebet Naval Architects (904-399-3673)  
1734 Emerson Street; Jacksonville, FL 32207

## **4) Shore Based Response**

### **4 (a) RESPONSIBILITIES – SHORESIDE PERSONNEL**

**Shore Based Response Structure (This is a city level plan; depending on the magnitude of the spill the Corporate Team will become involved as required).**

**a) Command & Control – City Director of Marine Operations (QI)**

- Responsible for overall direction and control of spill mitigation, team coordination & resource allocation. Coordinates activities between OSRO and Salvage and Marine Firefighting provided as needed.

**b) Public Information – Senior VP of Operations & City General Manager**

- Responsible for external communications

**c) Safety – City Director of Marine Operations (QI)**

- Responsible for all safety aspects of the event for protection of passengers, crew, the environment and property.

**d) Liaison with Governmental Agencies – City General Manager**

- Responsible for interaction, timely communication and response for government agencies involved in the event

**e) Spill Response Operations – Director of Marine Operations (QI)**

- Responsible for overall coordination of the spill response operation.

**f) Planning – Vice President of Marine Operations**

**g) Logistics & Support – General Manger**

- Responsible to coordinate, organize and assign responsibility as required to best mitigate the spill and provide proper resources, both internal and external as needed.

**h) Finance - General Manager & Chief Financial Officer**

- Responsible to coordinate and secure all financial matters related to the event.

## **GENERAL MANAGER:**

In the event of an oil spill or SMI (serious marine incident) or any significant incident, the General Manager (or ranking city manager if the General Manager is not available), shall be in charge of the overall business & public relations aspects of the emergency at the city level. The GM will coordinate with the vessel Captain, Director of Marine Operations and Marine Vice Presidents for all marine issues. The GM shall contact the corporate management team in accordance with company policy.

## **CITY MANAGEMENT TEAM:**

The city management team will be tasked with providing support to the vessel. The needs will vary depending on the situation to support the Captain & crew but may include:

1. Assisting ship's crew as needed
2. Maintaining close, regular communication with the Coast Guard and other appropriate authorities
3. Communicating all pertinent information regarding the situation, the response and input from local authorities to the corporate management team
4. Contracting for towing services, diving services, medical services, emergency bus service
5. Coordinating with and expressing needs to the corporate management team regarding legal counsel and public relations firm involvement and support.
6. Coordinating with corporate management to designate a company spokesperson.
7. Provide assistance to the Captain to ensure required drug & alcohol testing and required regulatory reporting is accomplished

## **CORPORATE MANAGEMENT TEAM:**

Depending on the magnitude of the spill, the Senior Vice President of Operations or next senior executive will convene a meeting or conference call depending on the severity of the situation. Duties of the Corporate Management team include:

1. Maintain communication with the local management team to ensure accurate timely information is relayed.
2. Define and direct the public relations strategy and ensure it is communicated to all involved, so as not to issue conflicting and confusing statements.
3. Ensure all required regulatory reporting has been accomplished.



Entertainment Cruises, Inc. Non-Tank Vessel Response Plan

4. Contact & coordinate legal counsel as needed
5. Monitor assess and issue appropriate directives to serve the best interests of the passengers & crew, the environment, vessel and company.
6. Contact insurance carrier and investigator as necessary & coordinate as necessary.
7. Ensure all internal reporting & records keeping has been accomplished or initiated.
8. Coordinate & initiate any outside assistance needed from other agencies or EC operations
9. Depending on scope of the incident, members of the corporate team may respond to the scene assist and direct response & recovery activity as needed.

**4 (b) Consistency with Area Contingency Plan**

Information contained in the response plan is consistent with applicable Area Contingency Plans (ACPs) and the National Oil and Hazardous Substances Pollution Contingency Plan {reference 155.5030(f)}

**5) Contact Information**

**5 (a) City Emergency Contact Information**

Agency	Boston	Chicago	New York	Norfolk	Washington, DC
National Response Center	800-424-8802	800-424-8802	800-424-8802	800-424-8802	800-424-8802
US Coast Guard Local	617-223-3020	630-986-2155	718-354-4088	757-484-8192	410-576-2518
US Coast Guard 24 Hr	617-223-3201	414-747-7182	718-354-4353	757-668-5555	410-576-2693
Marine/Harbor Police/Ops	617-343-4721	312-742-3203	718-765-4100	757-638-6631	202-727-4582
Police/Fire/Emergency	911	911	911	911	911
Marine Fire Unit	617-561-1910	312-337-1130	212-570-4287	757-686-2525	202-727-4582
Clean Harbors	800-645-8265	800-645-8265	800-645-8265	800-645-8265	800-645-8265
State Police	617-567-2233	312-433-8000	973-578-8173	757-455-3980	911
Bomb Squad	617-567-2233	312-746-7618	911	911	202-645-3788
Air/Sea Rescue		312-742-3202			202-727-4582
WQIS	800-736-5750	800-736-5750	800-736-5750	800-736-5750	800-736-5750

## **5 (b) Salvage & Marine Firefighting Response Provider**

Information regarding shipboard spill mitigation has been provided to the Salvage & Marine Response Provider listed below:

- Ardent Global  
4687 World Houston Pkwy  
Suite 200  
Houston, Texas 77032
  - Phone: +1 832 850 4150 or 1 954 545-7872
  - Email: [response@ardentglobal.com](mailto:response@ardentglobal.com)

**Note:** This plan incorporates resources identified in the Ardent Global current Core Geographic Specific Appendices accepted by the USCG. The most current is version 12, dated 1 July 2019. Entertainment Cruises has an agreement with Ardent Global to provide Salvage & Marine Firefighting Services and Response Time Frames in accordance with Table 155.4030(b).

## **5 (b) Oil Spill Response Provider**

- **Water Quality Insurance Syndicate 800-736-5750**
- **Clean Harbors 800-645-8265**

## **5 (c) Fleet Management Contact Information**

For each operation (see Fleet Contact Information):

- **Qualified Individual – Director of Marine Operations**
- **Alternate QI – Assistant DMO or Senior Captain**

<i>Full Name</i>	<i>Department/Title</i>	<i>Business</i>	<i>Mobile</i>	<i>Home</i>	<i>Email</i>
	Entertainment Cruises, Inc. 211 N. Union St, Suite 301; Alexandria, VA 22314				
	VP of Marine Operations				
	National Director Marine Operations				
	National Director Marine Operations				
	National Director Marine Operations				

Entertainment Cruises, Inc. Non-Tank Vessel Response Plan

<b>Corporate Admin</b>	Entertainment Cruises, Inc. NBC Tower; 455 N Cityfront Plaza Drive, Suite 2600; Chicago, IL 60611		
[Redacted]	President	[Redacted]	
	Chief Operations Officer	[Redacted]	
	Chief Financial Officer	[Redacted]	
	VP of Marketing	[Redacted]	
	Regional VP - Midwest	[Redacted]	
	Regional VP - Northeast	[Redacted]	
	Regional VP - Mid Atlantic	[Redacted]	
<b>Mid-Atlantic Region</b>			
<b>Norfolk</b>	109 E. Main Street, Suite 500, Norfolk, VA 23510		
[Redacted]	Director of Marine Operations	[Redacted]	
	Senior Captain	[Redacted]	
	General Manager	[Redacted]	
	Regional Director of Marine Operations	[Redacted]	
	Regional VP - Midatlantic	[Redacted]	
<b>Baltimore</b>	575 S Charles Street, Suite 501, Baltimore, MD 21201		
[Redacted]	Director Marine Operations	[Redacted]	
	General Manager	[Redacted]	
	Regional Director of Marine Operations	[Redacted]	
	Regional VP - Midatlantic	[Redacted]	
<b>Greater Washington, DC</b>	580 Water Street SW, Pier 4; Washington, DC 20024		
[Redacted]	Regional Director of Marine Operations	[Redacted]	
	Director Marine Operations	[Redacted]	
	Asst. Director Marine Operations	[Redacted]	
	General Manager	[Redacted]	
	Regional VP - Midatlantic	[Redacted]	
<b>Alexandria - PRC</b>	211 North Union, Suite 250 Alexandria, VA 22314		
[Redacted]	Director of Marine Operations	[Redacted]	
	Director of Maintenance	[Redacted]	
	Marine Operations Manager	[Redacted]	
	Regional Director of Marine Operations	[Redacted]	
	Regional VP - Mid-Atlantic	[Redacted]	

Entertainment Cruises, Inc. Non-Tank Vessel Response Plan

Northeast Region					
Boston, MA	200 Seaport Boulevard, Suite 75; World Trade Center, Boston, MA 02210				
	Asst Director Marine Operations				
	Director of Marine Operations				
	General Manager				
	Regional VP - Northeast				
New York, NY	62 Chelsea Piers, Suite 200, New York, NY 10011				
	Director of Marine Operations				
	Senior Captain				
	General Manager				
	Regional VP - Northeast				
Philadelphia	123 Chestnut Street, Suite 402, Philadelphia, PA 19106				
	Director of Marine Operations				
	General Manager				
	Regional VP - Northeast				
Midwest Region					
Chicago, IL	NBC Tower; 455 N Cityfront Plaza Drive, Suite 2600; Chicago, IL 60611				
	Regional Director of Marine Operations				
	Captain Odyssey Lake Michigan				
	Captain Mystic Blue				
	Seadog Marine Manager				
	Regional VP - Midwest				

## 6) Training Procedures

Entertainment Cruises has elected to follow the Passenger Vessel Associations Alternative Training and Exercise Program. The Passenger Vessel Association (PVA) has submitted to Coast Guard Headquarters for review and approval an Alternative Training and Exercise Program (ATEP) for vessels with a fuel capacity of less than 250 barrels. This NTVRP contains the elements of the PVA ATEP.

The PVA ATEP's provisions differ from and are more flexible than the provisions of 33 CFR section 155.1055. The very essence of any ATEP is an alternative to the comparable CFR provision and therefore may differ from it to some extent.

# Non Tank Vessel Response Plan

## Geographic Specific Appendix

### Sector Hampton Roads – Norfolk, VA

#### + Areas of Operation

- Elizabeth River (Norfolk Waterfront to US Navy Yard)

#### + Volume of Oil used for Response

- MMPD: 900 g
- Worst Case Discharge: 9,800 g

#### + Federal & State Notifications

- National Response Center: 800-424-8802
- USCG Sector Hampton Roads: (757) 668-5555
- EPA Mid-Atlantic Region III: (800) 438-2474
- Joint Harbor Operations Control (757) 638-6631

#### + Qualified Individual

- [REDACTED] - Director of Marine Operations
- Office: [REDACTED] Cell: [REDACTED]

#### + Alternate Qualified Individual

- [REDACTED] – Captain
- Office: [REDACTED] Cell: [REDACTED]

#### + OSRO:

- Clean Harbors Environmental Services
- 800 645-8265 (nationwide response number)

#### + Salvage, Emergency Lightering & Marine Firefighting Resources:

- Ardent Global
- 206-332-8200 (nationwide response number)

#### + WQIS (Water Quality Insurance Syndicate)

- 800-736-5750

○

# Non Tank Vessel Response Plan

## Vessel Specific Appendix

### Spirit of Norfolk

- 1) USCG COTP Zone: Hampton Roads
- 2) Area of Operation: Norfolk, VA
  - a. Elizabeth River (Norfolk Waterfront to US Navy Yard)
- 3) Vessel Data:
  - a. Passengers: 600
  - b. Total Volume
    - i. Fuel: 9,800 g
    - ii. Lube: 75 g
  - c. MMPD: 980 g
  - d. Worst Case Discharge: 9,800 g
  - e. Dimensions: 187' x 38' Draft: 7'
  - f. Tank Capacity:
    - i. Fuel: 9,800 (2 tanks each with a capacity of 4,900 g)
    - ii. Lube: 75 g
    - iii. Potable: 11,000 g
    - iv. Ballast: 0
    - v. Slop: 0

#### + Qualified Individual

- o [REDACTED] - Director of Marine Operations
- o Office: [REDACTED] Cell: [REDACTED]

#### + Alternate Qualified Individual

- o [REDACTED] – Captain
- o Office: [REDACTED] Cell [REDACTED]
- o



## WRITTEN CONSENT Salvage & Marine Firefighting

This Written Consent (the "Consent") is made and entered into on this **23<sup>rd</sup> of December 2019** by and between: **Entertainment Cruises by Hornblower Events and Cruises**, a company duly incorporated under the laws of **the United States** having its principal office at **455 North Cityfront Plaza Drive, Suite 2600, Chicago, IL 60611** (hereinafter referred to as "VO").

and

**Ardent Americas LLC**, a company duly incorporated and existing under the laws of Delaware, having its principal office at 4687 World Houston Parkway, Suite 200, Houston, Texas 77032 USA (hereinafter referred to as "Ardent"),

[VO] and Ardent are hereinafter referred to as a "Party" and collectively as "Parties".

**WHEREAS**, [VO] is an **American** company whose vessel(s) transit through Navigable Waters of the United States and carry less than 2,500 barrels of oil as propulsion fuel.

**WHEREAS**, [VO] is required to comply with Title 33 Part 155 of the United States Code of Federal Regulations - Oil or Hazardous Material Pollution Prevention Regulations for Vessels (hereinafter referred to as the "33 CFR 155"), specifically 33 CFR 155 Subpart J for Nontank Vessels - Salvage and Marine Fire-Fighting Requirements; Vessel Response Plans for Oil (hereinafter referred to as the "Regulations");

**WHEREAS**, Ardent is a qualified provider of salvage and marine fire-fighting services as listed in the Regulations.

**WHEREAS**, the Parties wish to agree to the terms set forth herein for the planning and provision of salvage and marine fire-fighting services as set out in this Agreement, in respect to the vessel(s) listed in **Appendix I**.

### **NOW, THEREFORE, IT IS AGREED AS FOLLOWS:**

This Consent certifies that Ardent has entered into an agreement with [VO] and hereby consents to be named as the primary salvage and marine fire-fighting services resource provider in the client's Nontank Vessel Response Plan (hereinafter referred to as the "NTVRP").

Ardent hereby warrants that it fully meets all of the fifteen qualifying criteria listed in 33 CFR 155.4050 of the Regulations, and further certifies that upon notification of an incident requiring salvage and/or marine firefighting response by the [VO] or their authorized representative, Ardent agrees to and is capable of providing, and intends to commit to providing, the required services as listed in the Regulations. These services will be provided under a mutually agreeable contract and to the best of Ardent's capability, within the planning response timeframes listed in 33 CFR Table 155.4030(b), for the COTP zones specifically listed in the client's NTVRP.



This Consent will be included in the NTVRP, which will be held by the vessel on board, the [VO], and the vessel's Qualified Individual. This Consent must be presented to the U.S. Coast Guard for inspection upon their request.

Ardent, in accordance with the Oil Pollution Act of 1990 (OPA-90) and the California Code of Regulations, Title 14, certifies that [VO], as Plan Holder, has ensured the availability of the required personnel and equipment capable of responding to a maritime emergency requiring salvage, lightering, or marine firefighting, as applicable, within the required response times and in the specific Geographic Regions listed in the NTVRP for the covered vessel(s) named in **Appendix I** below.

Ardent further agrees that [VO] has the right to name Ardent and its resources for the Oil Pollution Act of 1990 and the California Code of Regulations, Title 14, for the covered vessel(s).

For the provision of standby services, [VO] shall pay to Ardent an annual retainer fee of **\$0** per vessel listed in **Appendix I**. Retainer fee is payable in advance and non-refundable and shall be due thirty (30) days after receipt of invoice.

This Consent shall commence on the date of its execution and be valid for a period of **one (1)** years and shall be automatically renewed upon expiry for an additional twelve (12) month periods indefinitely unless notified otherwise by either Party with sixty (60) days prior written notice.

Notwithstanding, Ardent reserves the right to rescind this authorization in the event of termination of its contractual arrangements with the aforementioned covered vessel(s).

**IN WITNESS WHEREOF**, the parties have duly executed this document on the date stipulated in the 1<sup>st</sup> paragraph of this Agreement.

**Ardent Americas LLC**

Name: [Redacted]

Title: OPA-90 Program Manager

Signed: \_\_\_\_\_

**Entertainment Cruises by Hornblower Events and Cruises**

Name: [Redacted]

Title: National Director of Marine Operations

Signed: [Redacted]