



HILTON STAMFORD, CONNECTICUT

Chairman's Corner

Welcome to the OPA 90 Forum Newsletter!
OCTOBER 2025

Dear Readers,

Welcome to this edition of the OPA 90 Forum Newsletter.

We begin on a somber note with the passing of **Jim Lawrence**, our friend and founding board member. Jim's energy, empathy, knowledge, and creativity left an enduring mark on our community. He will be greatly missed. His colleague, **Darrell Wilson**, shares a tribute and has joined our Board of Directors in Jim's place.

We also mark other changes to the Board. **Vice Chair Michael Gallagher** has stepped down, though he and Witte O'Briens remain active members. **John Carroll III** now fills his seat. Founding board member **John Allen** has also stepped down as director but remains with the organization; his successor, **Paul Hankins**, retired U.S. Navy Supervisor of Salvage Operations, brings deep expertise to the Board. We thank Mike and John for their invaluable service.

In this edition, contributing author **Ken Edgar** explores the technical aspects of **ammonia as a marine fuel**—offering promise for reducing greenhouse gases while posing unique challenges.

We also feature **Tim Williamson's** *When Seconds Count*, examining the impact of losing the **USCG Homeport** Vessel Response Plan database and the cautious optimism for its return.

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Additionally, Fred Kufler provides a legal perspective in *Bad Law, Bad Policy*, challenging current approaches in our field.

We trust you will find these articles both insightful and relevant.

Sincerely,

Douglas Martin
Chairman
OPA 90 Forum



New Member

Please welcome our newest OPA 90 Forum Member:
Capt. Paul Foran

OPA 90 Forum Loses Founding Member, James “Jim” Lawrence

By Darrell Wilson and the Lawrence Family Obituary

One of the stalwarts of the modern shipping industry and known to all as a statesman who brought the maritime industry together, Jim Lawrence passed away on June 1, 2025, at 70, after a courageous battle with cancer that began in late winter. His death marks the end of an era for the Connecticut Maritime Association (CMA) and the broader, international maritime community. Jim was a gentleman, a statesman, innovator, and constant advocate for international trade.

Jim’s early career grew in the bustling ports (and boardrooms) of New York City and Connecticut. He recognized the power of collaboration in an industry often described and defined by isolation and crisis. In the mid-80’s, he immersed himself in organizing maritime events into global forums. By 1988, he had joined the Connecticut Maritime Association (CMA) and under his leadership, the annual CMA Conference evolved from smaller gatherings into a must-attend event, attracting shipowners, lawyers, financiers, and regulators from around the world. For over 30 years, Jim’s vision and extensive network of professional sparked the industry forward.

Jim’s influence went beyond conferences and after a stint at Lloyd’s List, he co-founded MTI Network in 1990, a crisis communications firm that became a lifeline for shipowners, terminal operators, and offshore companies navigating high-stakes incidents from oil spills to regulatory upheavals. As founder and chairman, he provided invaluable counsel constantly, from the Exxon Valdez aftermath, the Oil Pollution Act of 1990 (OPA 90), and launched Marine Money, a pioneering journal that evolved into international conferences.

A mentor to generations, Jim championed education through the CMA’s Foundation, and for 15 years, served on the board of the Seamen’s Church Institute, advocating for seafarers’ safety and dignity, and joined the OPA 90 Forum to support pollution prevention efforts. In 2019, his contributions earned him the U.S. Coast Guard’s Distinguished Public Service Award, honoring his role in uniting experts and leaders from the maritime, regulatory, and financial sectors.



Following semi-retirement after handing CMA management to Informa in 2018, Jim remained an advisor, and bridge-builder among industry titans.

Jim’s personal life was as rich and varied as his professional one. He was a man of warmth and wit, known for his vast network of professionals and friends: colleagues, mentees, and friends who will forever carry his legacy forward. He is survived by his wife, Jill and two daughters, Katharine and Alexa, as well as his two brothers, Richard and Philip; his mother, Starr; and his four grandchildren, Oliver, Robinson, Starr, and Lazar. Our thoughts and heartfelt condolences go out to all the family.

Fair winds and following seas, Jim.

When Seconds Count: The Loss of Homeport and Its Impact on Emergency Vessel Response

By Tim Williamson, VP Salvage Operations, Donjon Marine Co.

It's 2:30 AM Saturday morning of a long holiday weekend. A 600-foot bulk carrier laden with fuel oil and cargo has lost propulsion 15 miles off the Florida coast. She's listing 10 degrees to starboard, taking on water, and drifting toward shallow waters. The master reports a potential breach in a fuel tank. Weather is deteriorating rapidly with an intensifying Category 2 hurricane approaching.

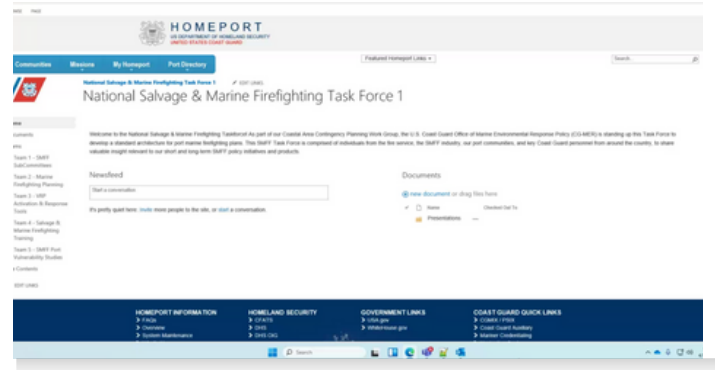
In the maritime emergency response community, the first critical question isn't just "what's happening?" It's "who's responsible for responding?" Under OPA 90, every tank vessel and non-tank vessels (over 400 gross tons) operating in U.S. waters must have a Vessel Response Plan (VRP) with pre-contracted salvage and marine firefighting providers, Oil Spill Removal Organizations (OSROs), and Qualified Individuals (QIs) ready to activate at a moment's notice.

Until April 12, 2025, any concerned party, whether local sector Coast Guard personnel, the area maritime community, a state response official, or a maritime firefighting specialist could quickly access the Coast Guard's Homeport portal, search the vessel's name, and immediately identify the designated response contractors. This transparency enabled the maritime community to rapidly coalesce around the designated responders, offering specialized equipment, local knowledge, or surge capacity when every minute mattered. Now, that critical information gateway has gone dark.

For over two decades, the Coast Guard's Homeport internet portal served as the central nervous system for vessel response plan information. Yes, the platform had its challenges and users frequently encountered technical glitches, slow load times, and an interface that seemed frozen in the early 2000s. The Coast Guard cited "increasing costs and system obsolescence" as driving factors behind the decommissioning, and few would argue that a more modern, robust platform wasn't long overdue.

But buried within Homeport's aging infrastructure was a function that proved invaluable during actual emergencies: VRP Express. This searchable database provided instant access to whether a vessel had an authorized VRP (Vessel Response Plan), and each authorized vessel's response plan details, including:

- Qualified Individual (the vessel owner's representative paying for the response) contact information
- Primary and alternate OSRO coverage areas and tier classifications
- Salvage and Marine Firefighting provider details
- Plan holder and vessel operator information



Accessing this information was an operational necessity. During an incident, multiple stakeholders need immediate access to this information: state and federal on-scene coordinators, port authorities, pilots, towing companies, classification societies, cargo interests, and other response contractors who might provide mutual aid.

Actions taken in the first hours of an incident often determine whether it remains manageable or escalates into a catastrophe. The Vessel Response Plan program stands as one of OPA 90's greatest successes, ensuring rapid, coordinated response capabilities are in place before an incident occurs. For 35 years, this program has protected our waters, our economy, and our coastal communities from the devastating impacts of oil spills and marine casualties.

The transparency that Homeport provided was a cornerstone of effective emergency response. The maritime emergency response community has always exemplified cooperation and mutual aid. But cooperation requires communication, and communication requires information. As we learned on April 12, 2025, when that information disappears, our collective response capability diminishes.

The Coast Guard made the difficult but perhaps necessary decision to sunset an obsolete system. As the Coast Guard charts a path forward, we want to publicly express our support to prioritize restoration of public access to VRP information. The VRP program and its transparency are critical for the marine transportation system.

Alternative Fuel of the Quarter: Ammonia

By Ken Edgar, OPA 90 Technical Committee

This is the first of a series of OPA 90 Forum Newsletter articles addressing alternative fuels in response to the global decarbonization of shipping. The articles are meant to provide a synoptic introduction to fuels being proposed to replace convention fossil fuels; the contents are neither meant to substitute for comprehensive technician documentation nor regulatory guidance. Current publications will be provided on the OPA 90 Forum website within the next few weeks. The recently publicized DNV 'AMMONIA IN SHIPPING' is an excellent and wide-ranging technical expose specific to the development of ammonia as a marine fuel.

Ammonia is a naturally occurring inorganic chemical compound of nitrogen and hydrogen with the formula NH_3 . A stable binary hydride and the simplest pnictogen hydride, ammonia is a colorless gas with a distinctive pungent/fishy odor. It is widely used in fertilizers, refrigerants, explosives, cleaning agents, and is a precursor for numerous chemicals. Biologically, it is a common nitrogenous waste, contributing significantly to the nutritional needs of terrestrial organisms by serving as a precursor to fertilizers in various forms and composition, such as urea and diammonium phosphate. Ammonia in pure form is also applied directly into the soil.

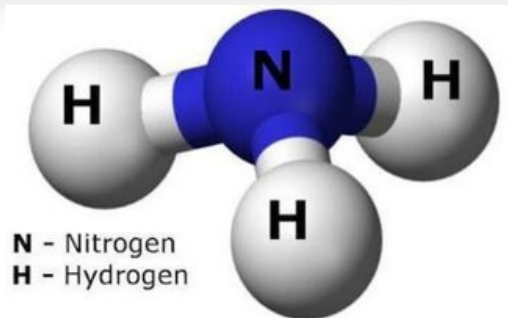
Ammonia has historically been utilized as a refrigerant onboard Navy ships, and its use continues in certain large-scale industrial and marine refrigeration applications.

The Haber-Bosch process is the main industrial method for producing ammonia by reacting atmospheric nitrogen (N_2) with hydrogen (H_2) under high pressure and temperature over a catalyst, a reaction developed by chemists Fritz Haber and Carl Bosch. However, the process is energy-intensive and relies on fossil fuels for hydrogen generation, leading to substantial energy consumption and possible carbon dioxide emissions.

The process uses nitrogen from the air and hydrogen, typically produced by steam reforming of natural gas. The nitrogen and hydrogen gases are mixed and passed over an iron catalyst at high pressures (150-250 Atm. / 2,200-3,670 PSI) and temperatures (400-500° C / 750-9300 F). This reaction converts the gases into ammonia.

There is some misperception about 'colored' ammonia, albeit ammonia is colorless. Green ammonia uses hydrogen made from renewable-powered water electrolysis, resulting in zero carbon emissions, and making it a clean fuel and fertilizer. Brown ammonia is produced using traditional Haber-Bosch process methods that rely on fossil fuels for both energy and the hydrogen source. Blue ammonia is ammonia produced from natural gas using hydrogen that has been separated from the gas. The crucial characteristic of blue ammonia is that the carbon dioxide (CO_2) emissions generated during this process are captured/stored via carbon capture.

One of ammonia's major advantages is that it contains no molecular carbon; thus, when it's combusted in an engine it produces no CO_2 emissions. Fuel storage and delivery systems need not be overly complex when ammonia is used in its liquid form, reducing operating costs. Ammonia becomes a liquid when it's either cooled below its boiling point of -33.1 °C (-27.6 °F) or compressed to a high enough pressure.



Ammonia is already being used as fuel in power generation. Compared to hydrogen, ammonia has a higher energy density by volume, making it a more practical fuel for transport and storage. Though still less dense than fossil fuels, ammonia has a lower volumetric efficiency and energy density than diesel. Ammonia engines also have a lower efficiency than traditional fossil fuel engines. In sum, a ship that uses ammonia needs larger fuel storage capacity. The volume and weight of the storage infrastructure required also impact the vessel's operating range.

There are three main challenges when using ammonia to fuel ships; ammonia is toxic; thus, the safety of the whole vessel must be considered, including the ventilation systems. Due to ammonia's toxicity and corrosiveness, it requires careful handling and storage. However, the risks can be mitigated with proper crew training and equipment. One of the biggest unknowns with ammonia is how to handle potential nitrous oxide (N_2O) emissions. Catalysts are being developed for N_2O , a potent greenhouse gas. For example, the Wärtsilä 25 ammonia solution with its optimized combustion and integrated aftertreatment has been designed to minimize all greenhouse gas emissions.

Ammonia fuel is globally abundant and has significant existing infrastructure for production and handling, with 180 million metric tons produced annually, primarily for fertilizer. Approximately 120 ports worldwide are already equipped with ammonia terminals; thus, infrastructure for handling ammonia, can be adapted for fuel use, potentially lowering costs.

The cost of ammonia varies by 'color.' Green ammonia costs \$885 - \$1,050 per MT, blue ammonia is about \$500 - \$670/MT and brown ammonia runs approximately \$250 - \$500/MT. By comparison, traditional fossil fuels cost about \$500 - \$600/MT. Additional costs may occur with policy incentives, such as carbon taxes/credits.

As of this writing, 154 ammonia-fueled vessels and 262 ammonia-ready vessels have been ordered and announced. Smaller vessels (OSVs/tugs) have been the first operational ammonia-fueled vessels, entering the water in 2023 and 2024. Out of the 70 ordered ammonia-fueled vessels, 29 vessels are ammonia carriers; 28 vessels are bulk carriers, and recently the world's first ammonia-fueled containership Yara Eide. These vessels are expected to be operable over the next two-years.

Bad Law Bad Policy - Tug Master Deemed an OPA 90 “Responsible Party”

By Alfred J. Kuffler, Senior Counsel Montgomery McCracken Walker, and Rhoads LLP

The court in *USA v. Ships International Inc.*, 779 F. Supp. 3d 1235 (W. D. Wash. 2025) has held that the master of tug that had become separated from the tow which then stranded and spilled oil is an OPA 90 “responsible party,”

This designation produced a personal liability for over \$14 million in response costs.

Although the opinion is bereft of any background facts explaining why the government chose to pursue the tug’s master, the local newspaper the “Point Reyes Light” (May 7, 2025, edition) reporting on the decision stated that neither the tug nor the tow had insurance. The tow was an old fishing vessel destined for a breaker in Mexico when she stranded. The master was the last pocket (deep or otherwise) available to reimburse the government for its expenditures. Neither the opinion nor the news report mentions whether the master has the resources to even begin to satisfy the court’s judgment.

OPA includes in the definition of “responsible party” the vessel’s “operator.” Based on the argument that had prevailed in the earlier case of *Green Atlas Shipping v. USA*, 306 F. Supp. 2d 974 (D. Or. 2003), the only other decision addressing this question, the master argued that he should not be considered an “operator” because the Coast Guard did not require master’s to post certificates of financial responsibility otherwise demanded from those falling under the Act’s definition of “responsible party.” Despite this prior, and well-reasoned decision, the court held that “operator” meant anyone in control of a vessel, such as her master. The court further stated this definition was not tied to the financial requirements of OPA, and so the master’s argument was treated as irrelevant.

This decision is bad law. The point of being designated as a “responsible party” is to assure that the spiller has the financial resources as the Act requires to respond to the liabilities OPA 90 imposes. The Coast Guard by not requiring masters to put up the certificates has implicitly recognized that individuals will not have the resources to do so, thus raising the question in this litigation - what is the point if the master has no money?



The industry is now faced with decisions reaching polar opposite conclusions resulting in a complete lack of guidance to the industry.

While perhaps these two decisions are only from trial, and not appellate courts, and because OPA 90 has produced little litigation during its 36-year life, each decision carries disproportionate weight. Hence the concern over the potential impact of *Ships International*.

Likewise, the decision is bad policy. The exposure of the master’s personal assets can only discourage able people from following the sea professionally. And this at the time the federal government is embarking on a major effort to build up the U.S. flag fleet and should be encouraging those embarking on their life’s work to go down to the sea in ships.

Miscommunication: The Root of All Disasters

By Rik van Hemmen, PE, Martin Ottoway

On July 5, 2023, Newark lost two firefighters in the Grande Costa D'Avorio fire.

The NTSB report did not mince words:

By sending firefighters into a CO₂-flooded space - contrary to well-established marine firefighting practice - the Newark Fire Division exposed its people to unnecessary risk. Lacking vessel firefighting training, they were unprepared, ineffective, and ultimately contributed to the fire's spread, the damage to the ship, and losing their own men.

The lesson was not new. Ports that take the time to coordinate with local responders in advance, that practice together, and that speak the same language, achieve better outcomes. Newark did not.

What makes this failure harder to digest is that the framework already exists. Since the Oil Pollution Act of 1990 (OPA 90), ship operators have had to maintain contracts with Salvage and Marine Firefighting (SMFF) providers. These teams are not hypothetical - they are real, staffed, equipped, and available nationwide, 24/7. They are meant to be integrated into the response. They are meant to communicate with municipal fire departments, not be ignored.

Layered on top of that is the OPA 90 Unified Command System, which promotes cooperation between all stakeholders: ship's crew, port personnel, municipal responders. Communication in such a system is not a luxury. It is the very thing that prevents responders from making fatal missteps, such as entering a car deck already blanketed in CO₂.

After the fire, investigations were launched, lessons were drafted, and the talk centered - as it should, on training, communication, and integration. One would reasonably expect such a tragedy to lead to more effective systems.



But then, on August 5, 2025, the Port Authority of New York and New Jersey announced that the Newark Fire Department would no longer board ships in Port Newark for firefighting, suppression, search and rescue, ventilation, or dewatering.

That response is baffling. Walking away is not safety. Safety is found in learning to integrate and communicate - not in avoidance.

And then came the twist. Six days later, on August 11, 2025, the Port Authority reported that Newark had rescinded its August 5 position. The problem was solved - but the news barely traveled. Bad news has legs; good news limps. I only learned of the retraction much later, and I suspect much of the maritime community still believes Newark is a no-show in shipboard emergencies.

Which brings us back, full circle, to the real problem: communication. Newark Fire Department's struggle is not only with marine firefighting - it is with telling its own story clearly. In safety, silence and confusion are just as dangerous as flame and smoke.

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