

## **Comment 1 for Ocean-Going Vessels 2011 (ogv11) - 45 Day.**

First Name: Michael  
Last Name: Villegas  
Email Address: mike@vcapcd.org  
Affiliation: Ventura County APCD

Subject: OGV Fuel Regulation  
Comment:

attached is a letter of support from the Ventura County Air  
Pollution Control Board

Attachment: [www.arb.ca.gov/lists/ogv11/2-ltr\\_nichols\\_ocean\\_going\\_vessels.pdf](http://www.arb.ca.gov/lists/ogv11/2-ltr_nichols_ocean_going_vessels.pdf)

Original File Name: ltr Nichols Ocean going vessels.pdf

Date and Time Comment Was Submitted: 2011-06-15 15:15:57

No Duplicates.

## **Comment 2 for Ocean-Going Vessels 2011 (ogv11) - 45 Day.**

First Name: Barry

Last Name: Wallerstein

Email Address: bwallerstein@aqmd.gov

Affiliation: South Coast AQMD

Subject: SCAQMD Staff Comments on Proposed Amendments to the OGV Fuel Regulation  
Comment:

Please find attached the South Coast AQMD staff comments on the Proposed Amendments to the OGV Marine Fuel Regulation.

Attachment: [www.arb.ca.gov/lists/ogv11/3-scaqmd\\_staff\\_comments\\_-\\_ogv\\_fuel\\_amendments\\_-\\_062311.pdf](http://www.arb.ca.gov/lists/ogv11/3-scaqmd_staff_comments_-_ogv_fuel_amendments_-_062311.pdf)

Original File Name: SCAQMD Staff Comments - OGV Fuel Amendments - 062311.pdf

Date and Time Comment Was Submitted: 2011-06-17 08:53:20

No Duplicates.

## **Comment 3 for Ocean-Going Vessels 2011 (ogv11) - 45 Day.**

First Name: Candice  
Last Name: Kim  
Email Address: candice@coalitionforcleanair.org  
Affiliation: Coalition for Clean Air

Subject: Comments attached  
Comment:

I have attached a comment letter regarding the proposed amendments to the Ocean Going Vessels regulation.

This letter is co-signed by the following:

Diane Bailey  
Senior Scientist  
Natural Resources Defense Council

Drew Wood  
Executive Director  
California Kids IAQ

Jesse Marquez  
Executive Director  
Coalition for a Safe Environment

Ricardo Pulido  
Executive Director  
Community Dreams

Joy Williams  
Research & Community Assistance Director  
Environmental Health Coalition

John Kaltenstein  
Marine Program Manager  
Friends of the Earth

Patricia Castellanos  
Deputy Director  
Los Angeles Alliance for a New Economy

Joel Ervice  
Associate Director  
Regional Asthma Management & Prevention (RAMP)

Don Anair  
Senior Vehicles Analyst  
Union of Concerned Scientists

Attachment: [www.arb.ca.gov/lists/ogv11/4-comments\\_on\\_proposed\\_amendments\\_to\\_ogv\\_june\\_2011.pdf](http://www.arb.ca.gov/lists/ogv11/4-comments_on_proposed_amendments_to_ogv_june_2011.pdf)

Original File Name: Comments on Proposed Amendments to OGV June 2011.pdf

Date and Time Comment Was Submitted: 2011-06-17 16:52:15

No Duplicates.

**Comment 4 for Ocean-Going Vessels 2011 (ogv11) - 45 Day.**

First Name: C.L.

Last Name: Stathos

Email Address: randal.friedman@navy.mil

Affiliation:

Subject: Department of the Navy

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/ogv11/5-navy.pdf](http://www.arb.ca.gov/lists/ogv11/5-navy.pdf)

Original File Name: Navy.pdf

Date and Time Comment Was Submitted: 2011-06-20 09:17:55

No Duplicates.

## **Comment 5 for Ocean-Going Vessels 2011 (ogv11) - 45 Day.**

First Name: Henry

Last Name: Pak

Email Address: hpak@us.hanjin.com

Affiliation: Hanjin Shipping

Subject: Comments on Regulations for Fuel Sulfur Requirments for OGV

Comment:

<< Implementation date in accordance with Federal Regulation >>  
The implementation date of the CA Fuel Regulation is really required to be in conformity with the implementation date (Jan. 1, 2015) of US Federal Regulation and EU SECA Regulation for full compliances by shipping industry and a successful transition to very low sulfur.

<< Sufficient Fuel Supplying Infrastructure >>  
Considering fuel supplier's comments and my company experiences, there is no fuel supplier and port facility that can supply the 0.1% sulfur distillate fuel in the regions of Easter Asia and America at this moment. In this regard, be advised that sufficient market surveys and technical verifications should take precedence in order to confirm the possibility and availability of low sulfur fuel in those regions in 2014. In addition, we need to ensure that there is sufficient infrastructure to supply low sulfur fuel without difficulties.

Attachment: [www.arb.ca.gov/lists/ogv11/8-comments\\_on\\_regulations\\_for\\_fuel\\_sulfur\\_requirements\\_for\\_ogv.pdf](http://www.arb.ca.gov/lists/ogv11/8-comments_on_regulations_for_fuel_sulfur_requirements_for_ogv.pdf)

Original File Name: Comments on Regulations for Fuel Sulfur Requirements for OGV.pdf

Date and Time Comment Was Submitted: 2011-06-21 10:10:06

No Duplicates.

## **Comment 6 for Ocean-Going Vessels 2011 (ogv11) - 45 Day.**

First Name: Martin

Last Name: Schlageter

Email Address: martin@coalitionforcleanair.org

Affiliation: Coalition for Clean Air

Subject: Updated comments on OGV regulation (attached)

Comment:

I have attached a comment letter on the proposed amendments to the OGV regulation. This letter was originally uploaded last week but has been updated with additional signatories, which include:

Natural Resources Defense Council  
Coalition for Clean Air  
Bay Area Healthy 880 Communities  
California Kids IAQ  
Center for Environmental Health  
Coalition for a Safe Environment  
Community Dreams  
Environmental Health Coalition  
Friends of the Earth  
Los Angeles Alliance for a New Economy  
Regional Asthma Management & Prevention (RAMP)  
Union of Concerned Scientists  
West Oakland Environmental Indicators Project

Attachment: [www.arb.ca.gov/lists/ogv11/9-comments\\_on\\_proposed\\_amendments\\_to\\_ogv\\_june\\_2011.pdf](http://www.arb.ca.gov/lists/ogv11/9-comments_on_proposed_amendments_to_ogv_june_2011.pdf)

Original File Name: Comments on Proposed Amendments to OGV June 2011.pdf

Date and Time Comment Was Submitted: 2011-06-21 12:28:50

No Duplicates.

## **Comment 7 for Ocean-Going Vessels 2011 (ogv11) - 45 Day.**

First Name: Randal

Last Name: Freidman

Email Address: randalfriedman@gmail.com

Affiliation:

Subject: Department of the NAVY

Comment:

Attached is the signed letter from NAVAIR in support of the OGV amendments.

Attachment: [www.arb.ca.gov/lists/ogv11/10-navy.pdf](http://www.arb.ca.gov/lists/ogv11/10-navy.pdf)

Original File Name: navy.pdf

Date and Time Comment Was Submitted: 2011-06-22 11:12:23

No Duplicates.



## **Comment 8 for Ocean-Going Vessels 2011 (ogv11) - 45 Day.**

First Name: T.L.

Last Name: Garrett

Email Address: tgarrett@pmsaship.com

Affiliation: Pacific Merchant Shipping Association

Subject: PMSA Comments on Amemdments to Vessel Fuel Regulation

Comment:

See attached

Attachment: [www.arb.ca.gov/lists/ogv11/11-pmsa\\_comments\\_on\\_amendments\\_to\\_vessel\\_fuel\\_regulation.zip](http://www.arb.ca.gov/lists/ogv11/11-pmsa_comments_on_amendments_to_vessel_fuel_regulation.zip)

Original File Name: PMSA Comments on Amendments to Vessel Fuel Regulation.zip

Date and Time Comment Was Submitted: 2011-06-22 11:35:36

No Duplicates.

## **Comment 1 for Ocean-Going Vessels 2011 (ogv11). (At Hearing)**

First Name: Martin

Last Name: Schlageter

Email Address: Non-web submitted comment

Affiliation:

Subject: Coalition for Clean Air

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/ogv11/13-martin.pdf](http://www.arb.ca.gov/lists/ogv11/13-martin.pdf)

Original File Name: Martin.pdf

Date and Time Comment Was Submitted: 2011-06-24 10:25:00

No Duplicates.

## **Comment 2 for Ocean-Going Vessels 2011 (ogv11). (At Hearing)**

First Name: Kathy

Last Name: Long

Email Address: Non-web submitted comment

Affiliation:

Subject: County of Venture and Regional Defense Partnership 21

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/ogv11/14-kathy.pdf](http://www.arb.ca.gov/lists/ogv11/14-kathy.pdf)

Original File Name: kathy.pdf

Date and Time Comment Was Submitted: 2011-06-24 10:30:21

No Duplicates.

## **Comment 1 for Ocean-Going Vessels 2011 (ogv11) - 15-1.**

First Name: Robert  
Last Name: Clark  
Email Address: robert\_clark@apl.com  
Affiliation: American President Lines

Subject: APL Response to LSF 110809  
Comment:

August 5, 2011

Clerk of the Board  
California Air Resources Board  
1001 I Street, 23rd Floor  
Sacramento, CA 95814

### SUBMITTAL OF COMMENTS

Re: Proposed Amendments to the Regulations for Fuel Sulfur and Other Operational Requirements for Ocean-Going Vessels within California Waters and 24 Nautical Miles of the California Baseline.

APL Co. Pte LTD, hereafter known as APL, is a global container shipping business facilitating world trade since 1848. We operate a fleet of deep draft ocean going freight vessels calling at California ports and have a strong commitment to improving air quality in California. This is most recently evident through our initiation of the first-ever shore power "cold iron" system in the Port of Oakland in conjunction with the California Air Resources Board (ARB). To that end, we are concerned with the proposed amendments to the Regulations for Fuel Sulfur and Other Operational Requirements for Ocean-Going Vessels within California Waters and 24 Nautical Miles of the California Baseline, particularly with regards to regulatory consistency and potential loss of propulsion.

As members of the Pacific Merchant Shipping Association (PMSA), a maritime trade association representing shipping companies servicing regular trade routes through U.S. West Coast ports; we fully support their comments on these proposed amendments in their letter dated July 22, 2011. Furthermore, we support PMSA's approach to developing an international response to solving vessel emission problems. Given that vessels are mobile and routinely cross a wide array of boundaries and jurisdictions, the United States recognized the value of an international response with the creation of the United States and Canada Emission Control Area (ECA). As you are undoubtedly aware, it was approved by the International Maritime Organization in March 2010 and is scheduled to be implemented in August 2012.

The ARB Proposed Amendments take a step toward regulatory consistency by postponing until to 2014 the date at which the percent sulfur required will decrease. While we welcome this postponement, particularly for reasons relating to loss of

propulsion as outline below, it leaves a one year gap of inconsistent regulations for vessels calling at California ports. We strongly encourage ARB to make the postponement date 2015 in order to align with the ECA's percent sulfur reduction date.

With regards to loss of propulsion (LOP) associated with fuel oil switching, APL's U.S.-flag division, APL Maritime (AML) conducted an analysis of the LOP marine casualty reports made to the U.S. Coast Guard for vessels calling California ports in 2010. As you are aware, a vessel's loss of propulsion dramatically increases the risk to the environment and APL is committed to striving to eliminate such risk.

The LOP analysis was conducted in conjunction with underway audits aboard AML vessels operating from California ports in response to the ARB zone requirements. Recommendations were developed from this analysis and used in discussions with the various regulatory bodies concerning the issue of fuel oil switching, including the U.S. Coast Guard Sector San Francisco "Loss of Propulsion/ Marine Engineers" meeting on March 16, 2011 in Oakland. AML found enough subjective evidence in their analysis to believe LOP marine casualties reported by large ocean going vessels was directly related to fuel oil switching and contributed to stalling, loss of fuel oil pressure, and clogging of fuel lines and filters all of which resulted in the reportable marine casualty. To that end, APL strongly recommends that ARB postpone until 2015 the implementation of more stringent sulfur criteria in order for vessel owners and operators to be fully prepared for all possible contingencies when fuel oil switching.

In conclusion, APL strongly supports an international approach to addressing the emission issues associated with international shipping throughout the world. We believe that the international approach is critical to maintaining competitive parity of California ports. If you have any questions regarding our comments, please do not hesitate to contact me at earl\_agron@apl.com or 510-272-3985. Thank you for your consideration of our comments.

Sincerely,

Robert A. Clark, II  
Director of Environmental Affairs, Americas  
APL

Attachment: [www.arb.ca.gov/lists/ogv11/15-apl\\_lsf\\_comments\\_carb\\_110809.pdf](http://www.arb.ca.gov/lists/ogv11/15-apl_lsf_comments_carb_110809.pdf)

Original File Name: APL LSF Comments CARB 110809.pdf

Date and Time Comment Was Submitted: 2011-08-09 08:58:52

No Duplicates.

## **Comment 2 for Ocean-Going Vessels 2011 (ogv11) - 15-1.**

First Name: Lee  
Last Name: Kindberg  
Email Address: lee.kindberg@maersk.com  
Affiliation: Maersk Line

Subject: Support for OGV Fuel Rule Modifications and Future Considerations  
Comment:

Maersk Line appreciates this opportunity to comment on the modifications to the California OGV Fuel Rule. Please see attached file.

Attachment: [www.arb.ca.gov/lists/ogv11/16-maersk\\_line\\_ogv\\_fuel\\_rule\\_comments\\_aug\\_2011.docx](http://www.arb.ca.gov/lists/ogv11/16-maersk_line_ogv_fuel_rule_comments_aug_2011.docx)

Original File Name: Maersk Line OGV Fuel Rule Comments Aug 2011.docx

Date and Time Comment Was Submitted: 2011-08-09 09:18:06

No Duplicates.

### **Comment 3 for Ocean-Going Vessels 2011 (ogv11) - 15-1.**

First Name: T.L.

Last Name: Garrett

Email Address: tgarrett@pmsaship.com

Affiliation: Pacific Merchant Shipping Association

Subject: PMSA Comments on 15 Day Notice on Vessel Fuel Regulation Amendments

Comment:

See attached comments

Attachment: [www.arb.ca.gov/lists/ogv11/17-pmsa\\_-\\_15-day\\_notice\\_on\\_amendments\\_to\\_ogv\\_fuel\\_reg\\_9aug11.pdf](http://www.arb.ca.gov/lists/ogv11/17-pmsa_-_15-day_notice_on_amendments_to_ogv_fuel_reg_9aug11.pdf)

Original File Name: PMSA - 15-day Notice on Amendments to OGV Fuel Reg 9Aug11.pdf

Date and Time Comment Was Submitted: 2011-08-09 16:13:44

No Duplicates.

**Comment 4 for Ocean-Going Vessels 2011 (ogv11) - 15-1.**

This comment was posted then deleted because it was unrelated to the Board item or it was a duplicate.