



# INTERTANKO

The International Association of Independent Tanker Owners  
– For safe transport, cleaner seas and free competition –  
[www.intertanko.com](http://www.intertanko.com)

OSLO OFFICE  
NEDRE VOLLGATE 4  
P.O. BOX 761 SENTRUM  
N-0106 OSLO, NORWAY  
TEL: +47 22 12 26 40  
[OSLO@INTERTANKO.COM](mailto:OSLO@INTERTANKO.COM)

California Air Resources Board  
1001 I Street  
Sacramento, CA 95821  
USA

Monday, December 2, 2019  
Our Ref.: 3943-11117/DR

Dear Madame/Sir,

## **INTERTANKO comments to Public Hearing to Consider Proposed Control Measures for Ocean-Going Vessels At Berth**

The International Association of Independent Tanker Owners (INTERTANKO) would appreciate submitting a few relevant comments to the proposed amendments to the current regulation for Control Measures for OGV at Berth. The comments we submit should be considered as contributions aiming at safe and practical solutions for such a regulatory development.

INTERTANKO is a non-profit association of independent tanker owners from 40 countries operating approximately 4,000 oil, chemical and gas tankers trading worldwide. INTERTANKO has made previous contributions to this process and we apologise if some of the comments are repetitive.

The proposed amendments are aimed to extend At Berth Measures to tankers. The options suggested are:

- a) vessel based options like use of clean fuels, including dual fuel boilers and
- b) shore side options like “cold ironing”, use of shore electric pumps or “emissions capture and control systems” either located on shore or on barges coming side by side when the tanker is at berth.

As in our previous submissions, INTERTANKO recognises all these measures could be applied but there are a number of practical and very important safety issues that need to be clearly addressed, defined and implemented.

### Vessel based options

Use of “clean fuels” while at-berth in boilers. According to another CARB regulation, all ships calling at California ports as well as trading within 25 nautical miles from the California shores use distillate fuels which, in accordance with the MARPOL Annex VI ECA regulation have a Sulphur content limited to maximum 0.10% by weight. Use of natural gas as fuel in boilers will only marginally reduce SOx and PM emissions versus the significant cost to retrofit and change operations of boilers for use of natural gas at berth. Such a cost should be taken into account versus the emissions from 0.10% Sulphur content (or lower) distillate fuels.

**LONDON OFFICE**  
ST. CLARE HOUSE  
30-33 MINORIES  
LONDON EC3N 1DD, UK  
TEL: +44 (0)20 7977 7010  
FAX: +44 (0)20 7977 7011  
[LONDON@INTERTANKO.COM](mailto:LONDON@INTERTANKO.COM)

**SINGAPORE OFFICE**  
70 SHENTON WAY  
#20-04 EON SHENTON  
SINGAPORE 079118  
TEL: +65 6333 4007  
Fax: +65 6333 5004  
[SINGAPORE@INTERTANKO.COM](mailto:SINGAPORE@INTERTANKO.COM)

**US OFFICE**  
801 NORTH QUINCY ST., SUITE 200  
ARLINGTON, VA 22203  
UNITED STATES OF AMERICA  
TEL: +1 703 373 2269  
Fax: +1 703 841 0389  
[WASHINGTON@INTERTANKO.COM](mailto:WASHINGTON@INTERTANKO.COM)

**ATHENS OFFICE**  
KARAGIORGI SERVIAS 2, SYNTAGMA  
ATHENS 105 62  
GREECE  
TEL: +30 210 373 1772  
FAX: +30 210 876 4877  
[ATHENS@INTERTANKO.COM](mailto:ATHENS@INTERTANKO.COM)

**BRUSSELS OFFICE**  
37-41 RUE DU CONGRÈS  
B-1000 BRUSSELS  
BELGIUM  
TEL: +32 2 609 54 40  
FAX: +32 2 609 54 49  
[BRUSSELS@INTERTANKO.COM](mailto:BRUSSELS@INTERTANKO.COM)

With regard to the NOx emissions, California ports are located in a MARPOL Annex VI NECA sea area, meaning that ships with a keel laid on and after January 1, 2016 have to be compliant with NOx Tier III emissions level which means a 90% reduction of such type of emissions. Should tanker be equipped in the future with dual fuel boiler and engines, then California ports should develop LNG supply infrastructure.

#### Shore side options

Use of cold ironing. There are three main important issues to be addressed. Firstly, clarification should be sought with Terminals and local Port Authorities of their safety regulations for use of electricity in transfer of flammable cargoes. Secondly, the risk of using electrical power instead of classic steam power in tankers transporting hydrocarbon cargoes should be assessed. Thirdly and very importantly, there has to be a very clear crafted legal scheme to address incidents and consequences of incidents in case the shore power is cut during the cargo operations. INTERTANKO acknowledges that automatically closed systems and procedures can be established, but tankers should not have any liability in the aftermath of an incident caused by such an event.

Use of capture and control systems. Once again, if the capture system is based on the shore, this has to be clarified with Terminals and Port authorities first. Costs and operation of such systems also have to be taken into consideration versus the low levels of SOx, PM and NOx emissions from distillates with ultra-low Sulphur content and from increased number of tankers meeting NOx Tier III level of emissions. Another aspect to be addressed is emergency situations when the tanker has to leave the terminal quickly. Such an emergency could be due to an incident on board the ship but also an incident on the shore side. A capture system operated from the shore should be capable of quickly disconnecting, independent of the cause and the nature of the emergency at the terminal.

For capture and control systems based on board barges, the same comments apply. Additional assessments and strict procedures will be needed for a safe ship-to-ship stability of operation and positioning.

INTERTANKO appreciates the opportunity to provide its input on this rule development. We will continue to assist to the best of our ability and hope that CARB recognises the challenges that need to be addressed, since, as long as the tanker is moored at-berth, particularly during cargo operations, there is not much it can do to control many of the associated risks indicated.

Looking forward to further dialogue.

Yours sincerely,



Dragos Rauta  
dragos.rauta@intertanko.com