

## Compliance and Enforcement Division March 8, 2005 Compliance Advisory

This Advisory is provided to inform you about activities of the District that may affect your operation. It is intended to assist you in your effort to achieve and maintain compliance with applicable air pollution rules and regulations.

ATTENTION: MARINE TERMINAL OPERATORS, MARINE AGENTS, SHIP OPERATORS, AND REFINERIES

## SUBJECT: VENTING, CLEANING, AND GAS FREEING OF MARINE TANK VESSELS

The District is responsible for regulating volatile organic compound (VOC) emissions from marine vessels, including VOC emissions from activities at Anchorage 9. VOC emissions from marine vessel operations are significant because they contribute to the formation of ozone (photochemical smog), are harmful to the public health, and can create an odor nuisance. Simply loading water (ballasting) into dirty tanks that previously contained crude oil can result in precursor organic emissions between 17 to 180 pounds per 1,000 barrels of water loaded.

The following summarizes requirements that you should be aware of:

- The District regulates VOC emissions from certain organic liquid cargos (gasoline, gasoline blending stock, aviation gas, aviation fuel, and crude oil) from marine tank vessels under the following regulations:
  - Regulation 8, Rule 44, "Marine Vessel Loading Terminals," which applies to loading operations at marine terminals;
  - Regulation 8, Rule 46, "Marine Tank Vessel to Marine Tank Vessel Loading," which applies to lightering operations; and
  - Regulation 8, Rule 2, "Miscellaneous Operations," which applies to all other marine tank vessel operations within the San Francisco Bay Area.
- These regulations prohibit any uncontrolled venting of emissions from a regulated cargo, including manual venting, bleeding pressure from cargo tanks, tank cleaning, gas freeing, ballasting, etc., in connection with cargo loading operations at marine terminals or in connection with lightering (subject to certain limited exemptions as set forth in District rules). Venting in preparation for marine terminal loading or lightering is also prohibited, even if it does not take place at the marine terminal or during a lightering event.
- The regulations also prohibit venting VOC emissions from a regulated cargo in connection with any other type of operations within the San Francisco Bay Area, except where total VOC emissions are kept below 15 pounds per day when exceeding a concentration of 300 parts per million of carbon on a dry basis.

## ► All previous correspondence that may conflict with District regulations is superceded. ◄

If you have any further needs, please contact the District at the following numbers:

- For a copy of the rules above visit the District website at: <a href="www.baaqmd.gov/dst/regulations">www.baaqmd.gov/dst/regulations</a> or call the Public Information Officer at (415) 749-4900.
- For compliance assistance, call (415) 749-4999, the Compliance Counselor Hotline.
- For questions about this advisory contact Paul Hibser, Air Quality Specialist at (415) 749-5141 or phibser@baagmd.gov.

Kelly Wee Director of Enforcement

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