

CIRCULAR 022-20 | April 23, 2020

## Emissions Advisory for Tank Vessel off the Southern Coast of California

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The California South Coast Air Quality Management District (AQMD) has been actively enforcing their [Marine Tank Vessel Regulations](#) (Rule 1142) that prohibit any liquid or gaseous leaks from "...all hatches, pressure relief valves, connections, gauging ports and vents and other equipment associated with a loading, lightering, ballasting, or housekeeping event" from tank vessels while in California Regulated Waters.

Gaseous leaks which violate Rule 1142 tend to occur on tankers which are at anchor off the Ports of Los Angeles and Long Beach for extended periods of time during the times of year when ambient air and water temperatures are warm. As the weather in Southern California is expected to get much warmer over the weekend, the likelihood of a pressure release being necessary for safety purposes increases and may result in a violation.

For tank vessels operating in the region, we recommend the following actions be taken:

1. If possible, vessels should wait for berthing outside of California state waters
2. If tank pressures start to rise while the vessel is at anchorage, employ saltwater cooling to the decks. In accordance with the Vessel General Permit (VGP), the decks must be free of oil and grease prior to the discharge of any water overboard. The start and stop times should be logged in order to show due diligence for reducing the pressure in the tanks.
3. If a P/V valve or Mast riser releases gases into the atmosphere, we strongly encourage you to self-report the release. It should also be noted whether the release was necessary for the safety of the vessel as part of the design of the pressure relief system. AQMD has stated that self-reporting is considered when determining whether to issue violation notices and fines. The AQMD self-reporting policy is available [here](#).

For additional information on these requirements, as well as potential penalty amounts, please see the following advisory issued by Peacock, Piper, Tong & Voss.

- [April 2020 Alert Concerning South Coast Air Quality Management District Rule 1142](#)

If you have any questions or need additional information, please contact us at [inquiry@wittobriens.com](mailto:inquiry@wittobriens.com).