

## Lightering Subgroup Meeting

March 13, 2006

### Charts

#### Chart 1

- The new treatment using lightering service is still not clear
- But concept of lightering service would clearer by restating as lightering service VESSEL
- The problem or lack of clarity above is really represents the concern with the inclusion of STBL emission in the overall consideration
- A potential alternative to adding “Vessel” noted above would be to change the definition of Uncontrolled lightering operations to apply to only emissions from the service vessels
- Both approaches will do essentially the same thing – exclude venting from the STBL in the compliance determination.

#### Chart 2

- The definitions of vapor balancing and vapor control system have almost become identical with the changes to paragraph c.1. Consider dropping the use of VCS.
- Minor corrections or clarifications
  - f. 2. VCS is a misnomer, see above. Review conflict in the use of VCS in this requirement vs. use of an alternative control technology
  - c. 2. This standard is only significant during controlled (VB) operations
  - d. 1. v. Suggest including reference to depressurization calculation Subpart FFFF in this paragraph
  - d. 3. & 5. Should added “affected” cargo owners to the review process
- Is the Subpart FFFF depressurization calculation a good methodology? On an overall basis, it appears to be the best available.

#### Charts 3-5

- How can the regulation focus only on the emissions from the service vessel and the Department still be able to ascertain whether we are getting results defined in Table 46-1?
  - Using information provided by the lightering service vessel operator
  - But the lightering service vessel operation may or may not know if STBL vented
    - Couldn't lightering service vessel operator expect the STBL master to provide information as a courtesy
    - If the cargo owner facilitated it, it would more likely occur
    - Agreeing to get the information
  - What would the Department do with knowledge of venting by the STBL

- We don't know how big the issue (venting by STBL) is
  - Need to know excess vent by STBL
  - Can we project "TYPICAL"
    - In 2005 about 1200M BBL were vapor balanced
    - During these lightering operations it was estimated that about 3.4M BBL were vented of the Integrity
    - Pressures were running lower in STBL, but venting is not known
- Concern with this approach
  - In ability to quantify STBL emissions
  - Accuracy
  - Volume of collected information by lightering service

#### Path forward discussion

- Department will review and discussion information discussed during this (3/13) meeting and amend version 7, as appropriate.
- Version 8 will be sent out to the Subgroup with expectation that no further subgroup meetings would be required.
- Subgroup would share comments via email and then the revised draft would be shared with the full regulatory work group in the near future.
- Date of the full work group meeting is up in air depending on Jim's jury situation.