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FUEL SWITCHING/PORT OF SAN FRANCISCO

Dear Vessel Operator:

On July 1, 2009, as an air quality initiative, the California Air Resources Board (ARB) implemented a state law requiring ocean going vessels to use low sulfur marine distillates in main engines, auxiliary engines, and auxiliary boilers in regulated California waters. For the purposes of this rule, California defined regulated state waters as all areas within 24 nautical miles of the baseline. Since implementation, the Coast Guard has seen an increase in the number of vessels experiencing propulsion losses and fuel related equipment failures. ARB regulatory advisories can be found at <http://www.arb.ca.gov/ports/marinevess/marinevess.htm>.

Before this rule entered the mandatory compliance phase the Coast Guard met with many industry leaders to identify the concerns and challenges involved in safely implementing fuel switching for large vessels. During these meetings several concerns related to procedures performance and engineering/design were identified. Since the implementation on July 1st, further challenges have arisen. Recent propulsion failures and instances of erratic engine performance related to fuel switching have been most prevalent during slow speed maneuvering.

The Coast Guard recognizes these challenges and urges ship owners and operators to continue to take proactive measures to improve fuel switching safety to prevent propulsion losses and equipment failures. Proper procedures, training, and maintenance are essential for vessels to safely switch between heavy/intermediate fuel oils and low sulfur marine distillates. Additionally, vessel operators need to have a good understanding of their systems' requirements and limitations, and determine if any engineering modifications may be necessary to safely switch between intended fuels.

Sector San Francisco sees every propulsion loss and case of sub standard machinery performance as a potential catastrophe. For that reason, vessels experiencing one or more engine performance issues, particularly those with a history of repeated propulsion losses and equipment failures will likely receive Captain of the Port orders requiring tug escorts until they demonstrate their issues have been resolved. We continue to work with vessel operators and ARB to reduce the involved risks and report developments in Marine Safety Information Bulletins (MSIB) and during our regular monthly reports to the San Francisco Harbor Safety Committee. For any questions or comments, please feel free to contact Commander Andrew Wood at (510) 437-3135.

Sincerely,

A handwritten signature in black ink, appearing to read "P. M. Gugg", written over a circular scribble.

P. M. Gugg
Captain, U.S. Coast Guard
Captain of the Port

Copy: CGD11 OPCEN , CG D11(dp), CG Vessel Traffic Service San Francisco, San Francisco Bar Pilots,
Harbor Safety Committee of the San Francisco Bay Region