

The impact of scrubber discharge on the water quality in estuaries and ports

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1 The impact of scrubber discharge on the water
2 quality in estuaries and ports

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18 ABSTRACT

19 **Background:** The International Maritime Organization (IMO) has set limits on sulphur content in
20 fuels for marine transport. However, vessels continue to use these residual high sulphur fuels in
21 combination with exhaust gas cleaning systems (EGCS or scrubbers). Next to high sulphur,
22 combustion of these fuels also results in higher emissions of contaminants including metals and
23 PAHs. In scrubbers, exhaust gases are sprayed with water in order to remove SO_x, resulting in
24 acidic washwater with elevated contaminant concentrations discharged in the aquatic ecosystem.
25 The number of vessels with scrubbers is increasing rapidly, but knowledge on washwater quality
26 and impact are limited.

27 **Results:** The scrubber washwater is found to be acidic with elevated concentrations of e.g. zinc,
28 vanadium, copper, nickel, phenanthrene, naphthalene, fluorene and fluoranthene. Model
29 calculations on the effects of scrubber discharge under scenario HIGH (20% of vessels, 90th
30 percentile concentrations) on the water quality in harbor docks showed a decrease in pH of 0.015
31 units and an increase in surface water concentrations for e.g. naphthalene (189% increase) and
32 vanadium (46% increase).

33 **Conclusions:** The IMO established sulphur regulations to mitigate the impact of high sulphur
34 emissions of the maritime sector. However, the use of open loop scrubbers as an abatement
35 technology will not reduce their contribution to ocean acidification. In addition, different types of
36 scrubbers discharge washwater that is acute toxic for aquatic organisms. However, washwater is
37 diluted and the compounds for which a large increase in surface water concentrations was
38 calculated in the Antwerp (Belgium) harbour docks (Naphthalene > Phenanthrene > Fluorene >
39 Acenaphthene > Vanadium) were not the compounds that already exceed their respective Water
40 Quality Standards (WQS). Nevertheless, the WQS of several ‘priority hazardous substances’

41 (Water Framework Directive) are already exceeded in the docks and the Scheldt estuary. Since
42 these hazardous substances are also identified in the washwater, scrubber washwater discharge
43 should be discouraged in coastal waters and estuaries with large ecological value.

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46 **Keywords:** marine traffic, pollution, EGCS, SECAs, water quality, acidification

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59 1. Background

60 International shipping has a significantly effect on air quality, with a contribution to global
61 emissions of more than 20% for nitrogen oxides (NO_x), around 10% for sulphur oxides (SO_x) and
62 almost 8% for particulate matter (PM)^{1,2}. This has a number of environmental consequences³, such
63 as ocean acidification⁴ and disturbance of climate regulation⁵, and also impacts human health in
64 coastal regions through deteriorated air quality^{6,7}. To mitigate these effects, the IMO (International
65 Maritime Organization) has included annex VI (Prevention of Air Pollution) to the International
66 Convention for the Prevention of Pollution from Ships (MARPOL). This has resulted in a global
67 cap on sulphur in fuel oil of 3.5% (mass percentage) from 2012 and a maximum sulphur content
68 of 0.1% in dedicated SO_x Emission Control Areas (SECA's) from 2015 onwards⁸. A new stringent
69 global limit on fuel sulphur content of 0.5% came into force on January 2020.

70 To comply, ships can use compliant low sulphur fuel oil or alternative fuels which are low in
71 sulphur, such as liquefied natural gas (LNG) or methanol. The IMO sulphur limits only apply to
72 atmospheric emissions. Consequently, it is allowed to continue to use high sulphur fuels in
73 combination with an exhaust gas cleaning system (EGCS or scrubber). In scrubbers, the exhaust
74 gases of vessels are sprayed with liquid in order to remove the SO_x before it will be emitted to the
75 air. Scrubbers are capable of removing up to 95% of the SO_x in the exhaust gases and meet the
76 IMO S exhaust limits⁹. Most scrubbers installed on vessels are wet scrubbers and use 'open loop'
77 or 'closed loop' systems. Open loop systems, also referred to as seawater scrubbing technology,
78 dominate the market. In these systems, the exhaust gases are sprayed with seawater at a high flow
79 rate, and the SO_x in the exhaust gas is trapped and converted to sulphurous acid (SO₃²⁻) and
80 sulphuric acid (SO₄²⁻). The washwater generated in the scrubber is discharged in the surrounding
81 surface water at a typical flow rate of 200 – 500 L/s for a vessel operating at 15 MW. Alternatively,

82 closed loop systems use freshwater as the scrubbing medium, which is pre-treated with sodium
83 hydroxide (NaOH). This washwater recirculates in the scrubbing system. The scrubbing capacity
84 is maintained by dosing extra NaOH and periodically discharging smaller volumes of washwater,
85 typically 0.5 – 3 L/s on average for a vessel operating at 15 MW. Also ‘hybrid systems’ exist,
86 whereby vessels can shift the scrubber operation between open or closed loop mode.

87 Given the fairly recent changes in the IMO sulphur regulations, the amount of vessels equipped
88 with scrubbers is still limited, but changing rapidly. According to Clarksons Worldfleet Register,
89 consulted in November 2019, nearly 3000 scrubbers have already been installed, which
90 corresponds to 3% of the total number of vessels and 16% of the gross tonnage. This implies that
91 mainly large vessels invest in a scrubber. Additionally, 15% in numbers or 35% in gross tonnage
92 of all vessels ordered at this moment (November 2019) will have a scrubber installed. From an
93 economical perspective, scrubbers are an attractive option, particularly for larger vessels^{10, 11}. In
94 order to comply, the choice between using the more expensive low sulphur fuels or the installation
95 of a scrubber depends largely on the price difference between both, low sulphur fuels and common
96 heavy fuels¹². Depending on the conditions, the scrubber installation costs are found to be recouped
97 within the span of 1 - 2 years^{13, 14}. The number of scrubbers is predicted to continue to increase
98 after the implementation of the more restrictive global sulphur cap in 2020.

99 The use of scrubbers result in a shift of the environmental impact of sulphur from emissions to the
100 atmosphere towards a direct discharge into aquatic systems. Further, the high sulphur fuels used
101 by vessels with scrubbers are generally heavy fuel oils (HFO), which are residual fuels incurred
102 during the distillation of crude oil. Together with high sulphur emissions, these fuels are known to
103 result in higher emissions of other hazardous species including metals and polycyclic aromatic
104 hydrocarbons (PAHs) compared to low sulphur distillates such as marine gas oil (MGO). These

105 contaminants originate from higher concentrations of e.g. metals and PAHs in the fuel and larger
106 emissions during combustion of this residual fuel¹⁵. Several studies report that scrubbers reduce
107 the atmospheric emissions of SO_x or PM to a level that is comparable to emissions when operating
108 on MGO¹⁶⁻²⁰. However, PM emissions and removal by scrubbers depend on many factors and lower
109 removal efficiencies from scrubbers resulting in higher emissions of particles including black
110 carbon and PAHs compared to vessels operating on MGO have been reported^{21, 22}. In addition,
111 scrubbers are an end-of-pipe solution and a substantial part of the emitted compounds will be
112 trapped in the scrubber washwater and discharged in the surrounding surface water with potential
113 consequences for aquatic ecosystems^{18, 23-26}. Existing studies are limited, mainly focus on open
114 marine systems and conclude that the overall impact of scrubber use on pH changes and
115 contaminant concentrations is expected to be small under most conditions^{24, 27-29}. Yet, the long term
116 accumulation of contaminants caused by scrubber discharge can be of concern in smaller water
117 bodies where ships are numerous, such as estuaries or harbours^{30, 31}.

118 Data on washwater contaminant concentration are scarce, often proprietary and rarely published.
119 In present study, an extensive dataset on washwater contaminant concentrations and acidity is
120 compiled, based on own measurements and unpublished and published datasets. This data allowed
121 us to calculate the impact of scrubber use on water quality for two scenarios (10% and 20%
122 scrubber use) for the Antwerp harbour docks and the Scheldt estuary. While the IMO regulatory
123 framework primarily focuses on atmospheric emissions, also the discharge of washwater is
124 regulated to a certain extent. Washwater discharge guidelines are set for pH (min. of 6.5, measured
125 at 4 m from the overboard discharge point), for PAHs (max. 50 µg L⁻¹ PAH Phe equivalent at a
126 flow rate of 45 m³ MWh⁻¹) and turbidity (max. 25 NTU (Nephelometric turbidity units) above the
127 inlet water turbidity) (IMO, Resolution MEPC.184(59) and MEPC.259(68)). No criteria for metals
128 are included. However, in current Belgian legislation the discharge of contaminated water from

129 ships into their surrounding surface water is only accepted in several exceptional cases (e.g.
130 wastewater from kitchens)³². Consequently, the use of open loop scrubbers or closed loop scrubbers
131 with bleed-off discharge are not allowed in Belgian inland waters. To comply, vessels need to
132 operate on compliant low sulphur fuel or use scrubbers in closed loop mode with the boundary
133 condition that no washwater is discharged (zero discharge mode). While there is no current impact
134 of scrubbers on Belgian water bodies, it is important to get insight into possible consequences for
135 European ports, rivers, estuaries and coastal regions in order to streamline legislation. Ahead of the
136 implementation of the SECA's, shipowners have already criticized the uncertainty and the
137 inconsistency between the Member States on the use of scrubbers in order to comply with the
138 requirements of the Sulphur Directive. In an open letter, the European Community Shipowners'
139 Association (ECSA) urges that establishing legal certainty about proper compliance and
140 enforcement together with a fair level playing field between shipping operators and between
141 transport modes are a must³³.

142 The objective of present study is to identify contaminant concentrations in scrubbers washwater
143 and get insight in effects of scrubber discharge on the water quality, with emphasis on harbour
144 docks, rivers and estuaries.

145

146 2. Methods

147 2.1. Sampling

148 Washwater samples were collected from two separate marine vessels operating a scrubber. The
149 first vessel was equipped with a hybrid scrubber and was sampled in Belgium on two occasions in
150 October 2014: when at berth in the port of Antwerp, operating in closed loop mode and when

151 sailing on the Scheldt estuary in open loop mode. The second vessel had an open loop scrubber and
152 was sampled twice in October 2015: when sailing at the North Sea and when manoeuvring in the
153 port of Antwerp. Discharge and sampling of washwater in these Belgian waters was permitted by
154 the Flemish Environmental Agency for present research. Detailed information on scrubber type,
155 fuel and operating conditions can be found in the datasheet (Table S1). Samples were taken from
156 a tap close to the scrubber outlet. Right after sampling the temperature (°C) and pH were measured
157 with a temperature-pH electrode connected to a portable multi meter (HQ30D, Hach, US). Water
158 samples were collected in 1 L glass bottles for PAH analysis and in 0.25 L high density
159 polyethylene (HDPE) bottles for metal analysis. All samples were stored cool during transport.
160 Metal analyses were performed after acid digestion with HCl and HNO₃ by inductively coupled
161 plasma optical emission spectrometry (ICP-OES) following standard method ISO 11885.
162 Measured metals are Arsenic (As), Cadmium (Cd), Chromium (Cr), Copper (Cu), Mercury (Hg),
163 Lead (Pb), Nickel (Ni), Zinc (Zn) and Vanadium (V). PAHs were determined by gas
164 chromatography/mass spectrometry (GC/MS) following standard method EPA 8270 D. Measured
165 PAHs are Acenaphthene (Ace), Acenaphthylene (Acy), Anthracene (Ant), Benzo(a)anthracene
166 (B(a)A), Benzo(a)pyrene (B(a)P), Benzo(b)fluoranthene (B(b)F), Benzo(g,h,i)perylene (B(ghi)P),
167 Benzo(k)Fluorathene (B(k)F), Chrysene (Chr), Dibenz(a,h)anthracene (D(ah)A), Fluoranthene
168 (Fluoran), Fluorene (Flu), Indeno(1,2,3c-d)pyrene (I(123cd)P), Naphtalene (Naph), Phenantrene
169 (Phe) and Pyrene (Pyr). These results were combined with additional datasets on pH, metal and
170 PAH concentrations: (1) unpublished datasets from the same shipping companies as sampled in the
171 present study, (2) dataset resulting from sampling campaigns organised by the exhaust gas cleaning
172 system association (EGCSA) and the association representing port waste reception facility
173 providers (EUROSHORE)³⁴ and (3) from literature^{24, 26-28, 35}. Results are combined in a database

174 (Table S1). Parameters with many values below limit of quantification (BLOQ) were excluded
175 from further analysis (Figure S1, S2, Table S2).

176 2.2. Scenario's and model calculation

177 To calculate the impact of discharged washwater on the water quality two scenarios were defined.
178 Scenario LOW assumed that 10% of the total ship emissions were treated by scrubbers and vessels
179 discharged at average washwater concentrations. Scenario HIGH assumed a 20% treatment by
180 scrubbers and discharge at 90th percentile of washwater concentrations (Table 1 for scenario HIGH,
181 Table S3 for scenario LOW). Both scenarios were calculated for closed loop mode and open loop
182 mode separately. . From January till November 2019 about 350 unique vessels equipped with a
183 scrubber visited the port of Antwerp, with a total of approximately 1250 calls (information Antwerp
184 Port Authority and Clarksons Worldfleet Register). This corresponds to 8.7% of the total number
185 of vessels and 9.5% of the total number of calls. Scrubber types of vessels in the Antwerp port are
186 evenly distributed between open loop and hybrid scrubbers. It is difficult to estimate the future use
187 of scrubbers. Since the installation of a scrubber is economically profitable under most scenarios¹¹,
188 a further increase can be expected. However, the fuel market is changing rapidly and low sulphur
189 heavy fuels which are cheaper than distillates are becoming available and might influence scrubber
190 interest¹. The calculated scenarios included all fuel used by the vessels, from main and auxiliary
191 engines. For manoeuvring and berthing in harbours, auxiliary engines are typically used. As these
192 auxiliary engines are not always connected to the scrubber, the calculated changes in metal and
193 PAH concentrations in the harbour docks surface water could be an overestimation.

194 The contaminant input J_c (kg y^{-1}) to the water bodies (harbour docks and estuary) was calculated
195 as:

$$196 \quad J_c = Q_w * P_t * F_s * (C_c - C_d) \quad (\text{Eq. 1})$$

197 With Q_w (L MWh⁻¹) the discharge of washwater (closed or open loop) per unit of generated power
198 of the vessel, P_t (GWh y⁻¹) is the total power generated by the vessel in a certain water body
199 (harbour docks or Scheldt estuary), F_s the share of total emissions treated by scrubbers (0.1 for
200 scenario LOW or 0.2 for scenario HIGH), C_c (kg L⁻¹) is the concentration of the contaminant in the
201 washwater and C_d is the concentration of the contaminant in the docks. The power P_t generated by
202 the vessels in the Scheldt estuary (182 GWh y⁻¹) and Antwerp harbour docks (472 GWh y⁻¹) is well
203 constrained (data provided by the Antwerp port Authority). An average washwater discharge was
204 calculated for open loop (87 ± 50 m³ MWh⁻¹, N=44) and closed loop ($0.47 \text{ m}^3 \pm 0.25 \text{ m}^3$ MWh⁻¹,
205 N=7), based on the available data (Table S1). Note however that in very few cases vessels with
206 closed loop systems will not discharge any washwater, as they retain the washwater on board and
207 deliver it to port reception facilities on shore (personal communication shipping companies). The
208 concentrations of metals and PAHs measured in the inlet water were not used for the calculation
209 because values were often below limit of quantification (BLOQ). Additionally, concentrations of
210 e.g. zinc in inlet water samples were sometimes unrealistically high (Table S1), which can be
211 caused by sampling inlet water from a valve on board which could have resulted in elevated metal
212 concentrations originating from the metal tubing of the scrubber system. Instead, available data on
213 total metal and PAH concentrations in the harbour docks (C_d) were used and average values were
214 subtracted from the outlet concentrations prior to the calculation of fluxes and changes in surface
215 water concentrations (see Table 1 for concentrations). All outlet washwater concentrations reported
216 as BLOQ were replaced by the respective LOQ/2 and included in the calculations.

217 Changes in contaminant concentrations in the surface water resulting from the scrubber discharge
218 are calculated as:

219
$$\Delta C_c = \frac{J_c}{Q_r} \quad (\text{Eq. 2})$$

220 With ΔC_c ($\mu\text{g L}^{-1}$) the mean concentration change in the receiving water body caused by scrubber
221 discharge, J_c (kg y^{-1}) the contaminant input from scrubbers calculated with Eq. 1 and Q_r (L y^{-1}) is
222 the water flowrate through the receiving water body. The mean flow rate of the Scheldt estuary
223 was $100 \text{ m}^3 \text{ s}^{-1}$, for the Antwerp harbour docks Q_r was the sum of the flow rate ($16 \text{ m}^3 \text{ s}^{-1}$) and the
224 dispersive exchange D through the locks ($100 \text{ m}^3 \text{ s}^{-1}$, see appendix for calculation). Calculation
225 assumptions were that all discharged contaminants were evenly distributed in the water column
226 and stayed in suspension, i.e. during their stay in the docks (average residence time = 19 days) and
227 in the estuary (average residence time = 2.5 months). Calculated increase in concentrations were
228 compared with surface water concentrations measured during regular water quality monitoring
229 programs from 2015-2016 in the receiving water body (data from the Flemish Environmental
230 Agency and Antwerp Port Authority; in the docks $n=15$ (metals) and $n=15$ (PAHs), and in the
231 Scheldt estuary $n=115$ (metals) and $n=20$ (PAHs)).

232 For changes in TA, Sum CO_2 and H_2SO_4 in the harbour docks a dynamic model was set-up. In this
233 model, the docks are considered well mixed. The water body is affected by influx of freshwater (16
234 $\text{m}^3 \text{ s}^{-1}$, fixed water composition, data provided by the Antwerp port Authority), by exchange with
235 the adjacent estuary over the locks (data provided by the Flemish Environmental Agency, fixed
236 water composition of the estuary, dispersive flux proportional to concentration difference, fixed
237 bulk dispersion coefficient of $100 \text{ m}^3 \text{ s}^{-1}$, see appendix), by the scrubber efflux, and by gaseous
238 exchange with the atmosphere. The $\text{CO}_2(\text{aq})$ in scrubber effluent was assumed to be in equilibrium
239 with CO_2 in flue gas and assumed to have a fixed partial pressure of 0.1 atm^{36} . The carbonate
240 balance in the scrubber effluent was computed at observed effluent water temperature ($T= 25 \text{ }^\circ\text{C}$).
241 Scrubber flux of H_2SO_4 and TA were determined by assuming that all sulphur in the exhaust is
242 captured by the washing process. Further, 20% of vessels equipped with an open loop scrubber,

243 2.1% sulphur content in fuel, and a total of 90×10^6 ton fuel use per year for all vessels in the right
244 bank of the Antwerp harbour were assumed. The model was run to steady state to assess the
245 difference in water composition in the docks with and without scrubbers. Carbonate balances were
246 computed with the R package AquaEnv³⁷. The model was integrated with the R package deSolve³⁸.
247 The model code and scripts to run the scenario analyses are available on GitHub [link to the model
248 will be made available upon acceptance].

249 3. Results and Discussion

250 3.1. Scrubber washwater quality

251 To get insight in the concentrations of contaminants present in scrubber washwater a database was
252 compiled (Table S1). Metal and PAH concentrations in water that is discharged were found to be
253 elevated compared to surface water concentrations or Water Quality Standards (WQS) (Table 1,
254 Table S3). Differences between open and closed loop systems exist. The washwater in closed loop
255 scrubbers circulates within the system, contaminants accumulate over time, resulting in higher
256 concentrations of metals (on average 40 times higher) and PAHs (on average 1.3 times higher) in
257 the discharged water compared to open loop mode (2-way ANOVA; metals: $F_{1,323} = 26,7$; $p < 0,001$,
258 PAH: $F_{1,475} = 7.27$; $p = 0,007$) (Figure 1). However, in closed loop scrubbers the scrubbing capacity
259 is kept high by dosing sodium hydroxide resulting in a low volume of water needed to trap SO_x
260 efficiently. Closed loop systems discharge discontinuous and lower volumes of washwater (bleed-
261 off) with a calculated average volume of $0.47 \text{ m}^3 \text{ MWh}^{-1}$ (STDEV=0.0.25, N=7). In contrast, open
262 loop systems need a large volume of surface water to ensure removal of SO_x from the exhaust with
263 discharge volumes that are roughly 200 times higher (calculated average $87 \text{ m}^3 \text{ MWh}^{-1}$,
264 STDEV=50, N=44). The circulation of water and smaller washwater volumes when operating in
265 closed loop allows efficient treatment of the washwater using a hydrocyclone with removal of

266 particles before discharge. Hereby, contaminants are scavenged in a sludge fraction that is stored
267 and delivered to port reception facilities resulting in a lower total discharge of contaminants to the
268 surrounding surface water (6 times for metals and 183 times for PAHs) for scrubbers operating in
269 closed loop mode (differences are significant for metals: 2-way ANOVA; $F_{1,323}= 6.56$; $p=0,011$
270 and PAHs: $F_{1,475}= 30.4$; $p<0,001$) (Figure 2). The differences between metals and PAHs in total
271 discharge indicate that PAHs are trapped much more efficient in the sludge fraction than metals by
272 hydrocyclone treatment in closed loop mode. Also for scrubbers operating in open loop, the use of
273 washwater treatment systems is reported (Table S1). However, treatment of the large washwater
274 flow rates is less straightforward. A vessel sailing with 15 MW engine power will discharge
275 roughly 350 L s^{-1} . The large variation in concentrations and the limited number of scrubbers that
276 reported an open loop system with treatment in the dataset did not allow to draw conclusions on
277 differences in concentrations between open loop with and without treatment. The acidity of the
278 washwater in closed loop mode can be controlled by dosing the scrubbing media NaOH resulting
279 in higher average pH values in the discharged water (6.8, STDEV=1.7, n=6) compared to the
280 average pH values in open loop mode (4.8, STDEV=1.4, n=21).

281 Also within closed and open loop systems the variation in concentrations for the different
282 parameters is large (Figure 1). This variation can be attributed to many different factors including
283 fuel origin³⁹, fuel sulphur content⁴⁰, engine load¹⁵, additives, or the presence of treatment facilities
284 before the washwater is discharged. In general, the contaminants originate from the fuel, lubricant
285 oil or combustion process, are transported to the smokestack, washed out by the scrubber water
286 and end up in the washwater. Metal concentrations in fuels are known to vary substantially and are
287 related to the crude oil origin and refinery process³⁹. Since a substantial part of the metals in the
288 fuel is expected to end up in the scrubber washwater^{16, 18}, the fuel origin will directly affect the
289 washwater metal concentrations. Vessels with scrubbers usually operate on high sulphur fuel oil

290 (HSFO). These are residual fuels that are known to contain higher concentrations of metals
291 compared to distillate fuel (DF), e.g. MGO⁴¹. The metals V and Ni and to a lesser extent Cu are
292 typically tracers for residual fuel. For Zn the fuel and the lubricant oil have been reported to
293 contribute equally to the emissions^{41, 42}. Also in the present study V, Zn, Ni and Cu are the metals
294 that were measured in the highest concentrations in the scrubber washwater. In open loop scrubbers
295 average washwater concentrations with standard deviation (STDEV) were 200 $\mu\text{g L}^{-1}$ (STDEV 125
296 $\mu\text{g L}^{-1}$) for V, 111 $\mu\text{g L}^{-1}$ (STDEV 30 $\mu\text{g L}^{-1}$) for Zn, 52 $\mu\text{g L}^{-1}$ (STDEV 34 $\mu\text{g L}^{-1}$) for Ni and 43
297 $\mu\text{g L}^{-1}$ (STDEV 15 $\mu\text{g L}^{-1}$) for Cu. Concentrations in bleed-off from closed loop scrubbers were
298 9256 $\mu\text{g L}^{-1}$ (STDEV 6050 $\mu\text{g L}^{-1}$) for V, 469 $\mu\text{g L}^{-1}$ (STDEV 290 $\mu\text{g L}^{-1}$) for Zn, 2810 $\mu\text{g L}^{-1}$
299 (STDEV 2700 $\mu\text{g L}^{-1}$) for Ni and 584 $\mu\text{g L}^{-1}$ (STDEV 390 $\mu\text{g L}^{-1}$) for Cu. Besides, the concentration
300 of Cr was found to be high in the washwater of several scrubbers operating in closed loop, while
301 for most other washwater samples no elevated concentrations were measured. It is not clear where
302 the high concentrations originate from, as Cr is generally not present in fuel⁴¹. It is possible that
303 corrosion or abrasion of the scrubber installation, stimulated by the acidic washwater, is a source
304 of Cr, as was previously suggested for Cu^{24, 27}.

305 The higher emissions originating from combusting HSFO compared to DF, as reported for metals,
306 is even more pronounced for PAHs, with atmospheric emissions reported to be 200 times higher
307 when operating on HSFO¹⁵. In the case of HSFO, the PAHs in the exhaust generally originate
308 directly from the fuel¹⁵. The PAH concentrations in the emissions of marine engines are found to
309 be dominated by Phe, Naph, Fluoranthene and Fluoranthene⁴³, which corresponds to the PAHs that were measured
310 in high concentration in the washwater of present study with average values and STDEV in open
311 loop washwater of 2889 ng L^{-1} (STDEV 2987 ng L^{-1}) for Naph, 1685 ng L^{-1} (STDEV 1367 ng L^{-1})
312 for Phe, 583 ng L^{-1} (STDEV 415 ng L^{-1}) for Flu and 162 ng L^{-1} (STDEV 215 ng L^{-1}) for Fluoranthene
313 and closed loop bleed-off concentrations of 2175 ng L^{-1} (STDEV 2409 ng L^{-1}) for Naph, 3360 ng L^{-1}

314 L⁻¹ (STDEV 2146 ng L⁻¹) for Phe, 1148 ng L⁻¹ (STDEV 815 ng L⁻¹) for Flu and 280 ng L⁻¹ (STDEV
315 210 ng L⁻¹) for Fluoran.

316

317 3.2. Impact on water quality

318 The concentrations of most PAHs and all metals in closed loop bleed-off largely exceeded their
319 WQS (Tabel 1, Table S3) and are expected to be acutely toxic for most aquatic organisms. Acute
320 toxic effects of scrubber washwater on phyto- and zooplankton are reported, even at concentrations
321 of metals and PAHs much lower than the concentrations reported in present work^{23, 25}. The
322 synergistic effects caused by the mixture of metals and PAHs combined with low pH in scrubber
323 washwater result in higher toxicity than estimated from the effect thresholds of the individual
324 compounds^{23,44}. Acidification of the surface water can furthermore change the behaviour of metals
325 in the receiving aquatic ecosystems. A decrease in pH can result in a higher bioavailability and in
326 increase in remobilisation of metals from the sediment. However, the effects of washwater are
327 strongly influenced by dilution with surrounding surface water. Buhaug et al. (2006) modelled that
328 washwater at 50 m behind the vessels will be diluted 2000 times for vessels sailing in open sea and
329 1750 times during port operation at lower speed²⁸. The extent of dilution will depend on vessel
330 activity (at berth, manoeuvring, sailing) and physical characteristics of the receiving water body
331 such as dimensions and flow rate, which complicates the prediction of scrubber washwater toxicity.
332 When applying the dilution factor of 2000 on washwater metal and PAH concentrations almost no
333 compounds will exceed their WQS whereby no acute toxicity is expected.

334 The increase in metal and PAH concentrations in aquatic ecosystems that originate from scrubber
335 washwater is expected to be higher in inland waterbodies such as estuaries, rivers or harbours
336 compared to large open marine systems. The accumulation of metals and PAHs in the surface water
337 of the Antwerp harbour docks and the Scheldt estuary was calculated for a ‘scenario LOW’ (10%

338 open loop scrubbers and average washwater concentrations) and a 'scenario HIGH' (20% open
339 loop scrubbers and 90th percentile washwater concentrations) (Figure 3). In particular the
340 concentration of several PAHs (Flu, Naph and Phen) in the surface water of the Antwerp harbour
341 docks was simulated to increase due to scrubber discharge. An increase in concentration of 39%
342 under the 'scenario LOW' and 189% under the 'scenario HIGH' was calculated for naphthalene.
343 The mean concentration of vanadium in the docks would increase with 9% under scenario LOW
344 and 46% under scenario HIGH. The time vessels spend in the Scheldt estuary is shorter than in the
345 harbour docks, which resulted in lower total amount of fuel use, a lower volume of scrubber
346 washwater discharged and a smaller effect on metal and PAH concentrations in the surface water
347 compared to the docks. For the Scheldt estuary mean naphthalene concentrations were calculated
348 to increase with 5.0% (scenario LOW) to 25% (scenario HIGH). For vessels with scrubbers in
349 closed loop mode a large part of the metals and PAHs is removed from the washwater, trapped in
350 the sludge fraction and delivered on shore, with a smaller increase in pollutant concentrations as a
351 consequence (Table 1). The estimated increase in surface water metal and PAH concentrations are
352 worst case calculations as the assumption was made that contaminants stay in suspension, i.e.
353 during their stay in the docks with an average residence time of 19 days. However, metals and
354 PAHs might be removed from the water by adsorption to suspended solids followed by
355 sedimentation. Furthermore, PAHs can be degraded by biological and chemical processes, with
356 half-live values of 3 days to more than 500 days, depending on environmental conditions and the
357 PAH being degraded ⁴⁵. Mainly the low molecular weight PAHs measured in high concentrations
358 in the washwater (Naph, Phen, Flu) are known to degrade faster. In order to estimate the risks
359 related to scrubber water discharge it is important to further investigate contaminant behaviour in
360 the receiving water bodies. Yet, also in comparison with known existing emissions the total amount
361 of contaminants discharged by scrubbers is large. The calculated flux of metals and PAHs from

362 scrubber discharge under scenario high was larger than the sum of all known emissions to the
363 harbour docks for Naph (57 kg y⁻¹ for scrubbers compared to 19 kg y⁻¹ for all other sources), for
364 Phen (30 kg y⁻¹ for scrubbers compared to 11 kg y⁻¹ for all other sources), Flu (10 kg y⁻¹ for
365 scrubbers compared to 6 kg y⁻¹ all other sources), and Ni (994 kg y⁻¹ for scrubbers compared to 60
366 kg y⁻¹ all other sources)⁴⁶. Some of the pollutants that are present in scrubber washwater are already
367 exceeding (Flu, Pyr) or close to exceedance (Ni, Zn) of their respective WQS in the surface water
368 of the harbour docks or the Scheldt estuary (Figure 3). However, the compounds for which a large
369 increase in concentrations was calculated (Naph>Phe>Flu>Ace>V) are not the compounds that are
370 expected to pose the highest risk, based on the exceedances of the WQS. Nevertheless, several
371 pollutants that were measured in elevated concentrations and discharged with the scrubber
372 washwater are identified as ‘priority substances’ (Fluoran, Naph, Ni) or ‘priority hazardous
373 substances’ (Ant, B(a)P, Cd) by the European Water Framework Directive (WFD) and as such are
374 of major concern for European Waters. WQS exceedances of these compounds indicate that these
375 aquatic systems are under pressure of high contaminant concentrations and progressive reduction
376 of pollution from priority substances and the cessation or phasing-out of discharges, emissions and
377 losses of priority hazardous substances is required⁴⁷. Many European coasts and estuaries are part
378 of Natura 2000, the largest coordinated network of protected areas in the world to safeguard
379 valuable and threatened species and habitats. Mainly in these areas with large ecological values the
380 discharge of scrubber washwater should be restricted. In addition, the use of scrubbers deflect
381 attention from development of cleaner fuels⁴⁸. However, also the emissions from vessels operating
382 on low sulphur fuel are variable and subject to changes. With the sulphur regulations, new types of
383 low sulphur heavy fuel oils (hybrid fuels, intermediate fuels or ECA fuels) have entered the market.
384 How these fuels influence emission of metals and PAHs is not clear yet. It will, likely be necessary
385 to limit the use of all low quality fuels, with high and low sulphur content and instead encourage

386 the use of distillate fuels, mainly in coasts, estuaries and inland water bodies with large ecological
 387 value¹.

388 **Table 1.** Summarising numbers on scrubber washwater concentrations, fluxes and impact on water
 389 quality for scenario high (20% scrubbers).

Units	Conc. Docks (1)	WQS (2)	CLOSED loop - Scenario HIGH			OPEN loop - Scenario HIGH		
			Discharge conc. (90th perc.)	Flux kg y ⁻¹ (20% scrubbers)	Conc. Increase docks	Discharge conc. (90th perc.)	Flux kg y ⁻¹ (20% scrubbers)	Conc. Increase docks
Cr	3.34	5	10120	448	0.122	45.0	342	0.093
Cu	8.38	7	1780	78	0.021	130	998	0.273
Ni	μg L ⁻¹ 5.86	4*	6060	268	0.073	127	994	0.272
Zn	32.9	20	1524	66	0.018	260	1863	0.509
V	3.94	4	25000	1107	0.303	500	4069	1.112
Ace	4.92	60	745	3.28E-02	8.96E-03	648	5.27	1.44
Acy	7.20	4000	185	7.87E-03	2.15E-03	536	4.34	1.19
Ant	2.67	100*	446	1.96E-02	5.37E-03	308	2.50	0.685
Fluoran	9.51	6.3*	661	2.88E-02	7.89E-03	478	3.84	1.05
Flu	ng L ⁻¹ 3.72	2000	2370	1.05E-01	2.86E-02	1200	9.81	2.68
Naph	8.24	2000*	6370	2.82E-01	7.70E-02	6960	57.0	15.6
Phe	7.95	100	6970	3.08E-01	8.43E-02	3700	30.3	8.28
Pyr	13.0	40	554	2.40E-02	6.55E-03	1220	9.90	2.71
Total PAH	58.1		22200	9.80E-01	2.68E-01	13620	111	30.4

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 391 (1) Average values for total concentrations in the harbour docks
 392 (2) Water Quality Standards (WQS) from the EU WFD (*) or Flanders (dissolved concentrations for metals, total
 393 concentrations for PAHs)

394
 395 3.3. Acidification

396 Marine transport related emissions of NO_x and SO_x cause acidification of terrestrial and marine
 397 ecosystems⁴⁹. The contribution of anthropogenic N and S depositions to ocean acidification
 398 account only for a few percent of the acidifying impact of the global anthropogenic emissions
 399 (mainly caused by CO₂)⁵⁰. However, in certain restricted areas such as coastal waters with
 400 important shipping lanes or large harbours, the acidifying effect caused by NO_x and SO_x can exceed
 401 the effect of overall anthropogenic CO₂ emissions⁴⁹. In open loop scrubber systems the natural
 402 buffering capacity (alkalinity) of the sea or river water is used to neutralize the acid ions. Mean
 403 alkalinity in coastal waters varies between 2100 and 2400 μmol/l⁵¹ and is high enough to guarantee
 404 high SO_x removal efficiencies. Due to a calcium rich bedrock, the mean alkalinity in the surface
 405 water of the Scheldt estuary (4400 μmol L⁻¹) and the docks (3400 μmol L⁻¹) is high. In closed loop

406 systems, the acidity of the washwater is buffered by dosing NaOH to the circulating washwater in
407 order to have a bleed-off that is neutral (pH around 6-8). Since vessels with scrubbers operate on
408 high sulphur fuel (up to 3.5%) the acidifying sulphur compounds are discharged directly into the
409 surface water and their acidifying capacity is much larger than vessels operating on low sulphur
410 fuel (0.1% in SECAs). Model simulations with scenario HIGH (20% open loop scrubbers) show a
411 decrease in pH of 0.015 units caused by washwater discharge (Figure 4). The alkalinity will
412 comparably decrease slightly with $6 \mu\text{mol L}^{-1}$ or 0.16% and total sulphate concentrations will
413 increase with $3 \mu\text{mol L}^{-1}$ or 0.08%. For the Baltic Sea, the water pH has previously been calculated
414 to decrease by open loop scrubber use with roughly 0.0015 units (50% scrubbers scenario) to 0.003
415 units (100% scrubbers scenario)⁴⁹.

416 Since preindustrial times global ocean pH decreased with approximately 0.1 units with related
417 negative consequences for marine ecosystems⁵². Among many other sources, SO_x emissions of
418 marine transport contributes to this acidification. The IMO established sulphur regulations to
419 mitigate the impact of high sulphur emissions of the maritime sector. However, the use of open
420 loop scrubbers as an abatement technology will not reduce their contribution to the acidification.

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422 4. Conclusions

423 The number of vessels with a scrubber is increasing rapidly. Generally, the total acidifying potential
424 and emissions of hazardous substances of vessels with scrubbers operating on HSFO are higher
425 than from vessels operating on low sulphur compliant fuels. A substantial part of these emissions
426 are directly discharged with the washwater into receiving aquatic ecosystems.. This washwater is
427 found to be acute toxic for aquatic organisms and a substantial long term increase in the
428 concentrations of Naph, Phe, Flu, Ace and V following scrubber washwater discharge was
429 calculated for an estuary and harbour docks. The compounds for which a large increase in

430 concentrations was calculated (Naph>Phe>Flu>Ace>V) are not the compounds that are expected
431 to pose the highest risk, based on the exceedances of the WQS. Nevertheless, several pollutants
432 that are discharged with the scrubber washwater are identified as ‘priority substances’ or ‘priority
433 hazardous substances’ by the European Water Framework Directive and as such are of major
434 concern for European Waters. WQS exceedances of these compounds indicate that many European
435 aquatic systems are already under pressure. As such, mainly in coast and estuaries with large
436 ecological values the discharge of scrubber washwater should be restricted.

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449 **Figure Legends**

450 **Figure 1.** Metal (A) and PAH (B) concentrations ($\mu\text{g L}^{-1}$) in washwater from scrubbers operating
451 in closed loop (shaded boxes) and open loop (grey boxes). Boxplots with 5th and 95th percentile
452 (whiskers), 25th, median and 75th percentile and outliers (dots). Y-axis in logarithmic scale.

453 **Figure 2.** Total discharge (g MWh^{-1}) of metals (A) and PAHs (B) in washwater from scrubbers
454 operating in closed loop (shaded boxes) and open loop (grey boxes). Boxplots with 5th and 95th
455 percentile (whiskers), 25th, median and 75th percentile and outliers (dots). Y-axis in logarithmic
456 scale.

457 **Figure 3.** Increase in metal and PAH surface water concentrations (%) in the harbour docks (A)
458 and the Scheldt estuary (B) caused by open loop scrubber discharge compared to current
459 concentrations (grey, 100%) calculated with the scenario LOW (white) and scenario HIGH (black).
460 The ratio between water quality standards (WQS) and current (grey) metal and PAH surface water
461 concentrations in the docks (C) and the Scheldt estuary. The calculated concentration increase
462 caused by open loop scrubber discharge calculated by the scenario LOW (white) and scenario
463 HIGH (black).

464 **Figure 4.** Changes in total alkalinity (TA, $\mu\text{mol L}^{-1}$), H_2SO_4 ($\mu\text{mol L}^{-1}$) and pH in the surface
465 water from the Antwerp harbour docks caused by open loop scrubber discharge calculated with
466 scenario HIGH (20% open loop scrubbers).

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479 **List of abbreviations**

480 IMO: International Maritime Organization

481 EGCS: exhaust gas cleaning systems

482 PM: particulate matter

483 MARPOL: International Convention for the Prevention of Pollution from Ships

484 S: sulphur

485 SO_x: sulphur (x)oxide

486 SECA Emission Control Area

487 LNG: liquefied natural gas

488 NaOH: sodium hydroxide

489 HFO: heavy fuel oil

490 PAH: polycyclic aromatic hydrocarbons

491 MGO: marine gas oil

492 ECSA: European Community Shipowners' Association

493 HDPE: high density polyethylene

494 ICP-OES: inductively coupled plasma optical emission spectrometry

495 GC/MS: gas chromatography/mass spectrometry

- 496 As: Arsenic
- 497 Cd: Cadmium
- 498 Cr: Chromium
- 499 Cu: Copper
- 500 Hg: Mercury
- 501 Pb: Lead
- 502 Ni: Nickel
- 503 Zn: Zinc
- 504 V: Vanadium
- 505 Ace: Acenaphthene
- 506 Acy: Acenaphthylene
- 507 Ant: Anthracene
- 508 B(a)A: Benzo(a)anthracene
- 509 B(a)P: Benzo(a)pyrene
- 510 B(b)F: Benzo(b)fluoranthene
- 511 B(ghi)P: Benzo(g,h,i)perylene
- 512 B(k)F: Benzo(k)Fluorathene

- 513 Chr: Chrysene
- 514 D(ah)A: Dibenzo(a,h)anthracene
- 515 Fluoran: Fluoranthene
- 516 Flu: Fluorene
- 517 I'123cd)P: Indeno(1,2,3c-d)pyrene
- 518 Naph: Naphtalene
- 519 Phe: Phenantrene
- 520 Pyr: Pyrene
- 521 EGCSA: exhaust gas cleaning system association
- 522 BLOQ: below limit of quantification
- 523 TA: total alkalinity
- 524 WQS: Water Quality Standards
- 525 HSFO: high sulphur fuel oil
- 526 DF: distillate fuel
- 527 STDEV: standard deviation
- 528 WFD: Water Framework Directive
- 529

530 DECLARATIONS

531 *Ethics approval and consent to participate:* Not applicable.

532 *Consent for publication:* Not applicable.

533 *Availability of data and material:* All data generated or analysed during this study are included in
534 this published article and its supplementary information files.

535 *Competing interests:* The authors declare that they have no competing interests.

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537 *Authors' contributions:* JT collected samples, performed chemical analysis, interpreted the data and
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539 provided additional datasets and organized sampling campaigns. FJRM modelled the acidification
540 and revised the manuscript. RB contributed to the study design and revised the manuscript. All
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546 and data on the water quality and to the Royal Belgian Institute of Natural Sciences for their advice.

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549 **Supporting Information.**

550 File 1: TableS1: an Excel file that contains the compiled database on scrubber use and washwater
551 quality. A total of 127 samples, based on own sampling, received datasets and literature.

552 File 2: A Word document with information on calculations, 2 Tables and 2 Figures.

553 Table S2: all measured parameters with number of values below the limit of quantification

554 Table S3: Summarising numbers on scrubber washwater concentrations, fluxes and impact on
555 water quality for scenario low (10% scrubbers). The numbers of scenario high (20% scrubbers) are
556 included in the manuscript (Table 1).

557 Figure S1: All scrubber washwater metal concentrations

558 Figure S2: All scrubber washwater PAH concentrations

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Figures

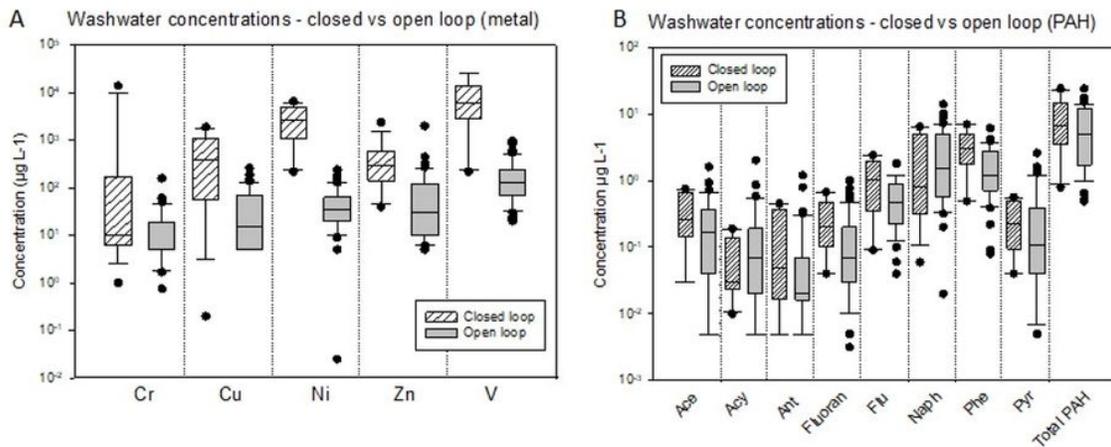


Figure 1

Metal (A) and PAH (B) concentrations ($\mu\text{g L}^{-1}$) in washwater from scrubbers operating in closed loop (shaded boxes) and open loop (grey boxes). Boxplots with 5th and 95th percentile (whiskers), 25th, median and 75th percentile and outliers (dots). Y-axis in logarithmic scale.

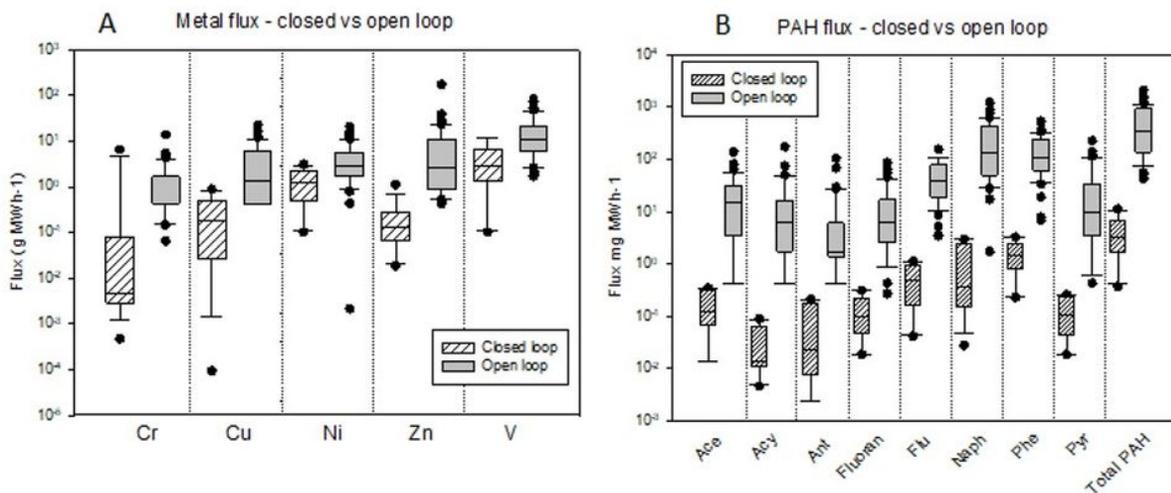


Figure 2

Total discharge (g MWh^{-1}) of metals (A) and PAHs (B) in washwater from scrubbers operating in closed loop (shaded boxes) and open loop (grey boxes). Boxplots with 5th and 95th percentile (whiskers), 25th, median and 75th percentile and outliers (dots). Y-axis in logarithmic scale.

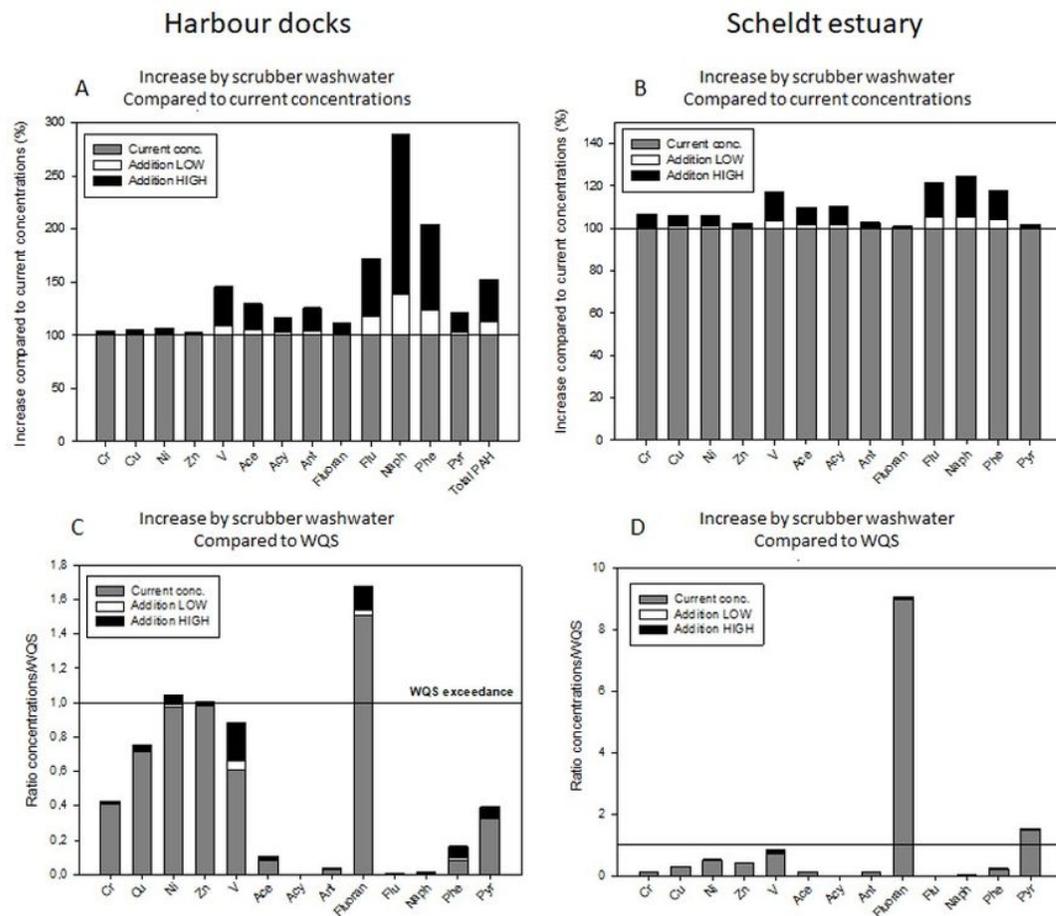


Figure 3

Increase in metal and PAH surface water concentrations (%) in the harbour docks (A) and the Scheldt estuary (B) caused by open loop scrubber discharge compared to current concentrations (grey, 100%) calculated with the scenario LOW (white) and scenario HIGH (black). The ratio between water quality standards (WQS) and current (grey) metal and PAH surface water concentrations in the docks (C) and the Scheldt estuary. The calculated concentration increase caused by open loop scrubber discharge calculated by the scenario LOW (white) and scenario HIGH (black).

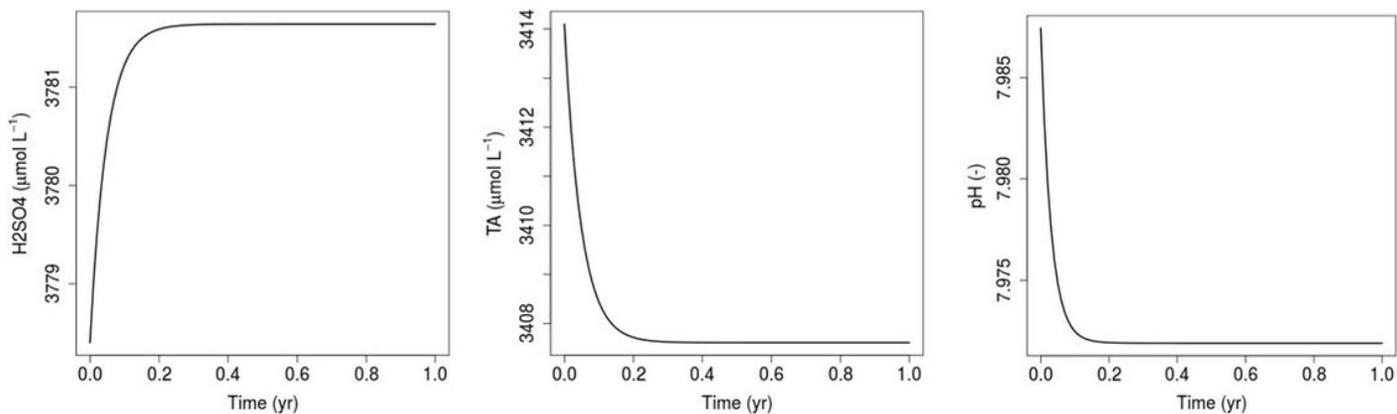


Figure 4

Changes in total alkalinity (TA, $\mu\text{mol L}^{-1}$), H₂SO₄ ($\mu\text{mol L}^{-1}$) and pH in the surface water from the Antwerp harbour docks caused by open loop scrubber discharge calculated with scenario HIGH (20% open loop scrubbers).

Supplementary Files

This is a list of supplementary files associated with this preprint. Click to download.

- [SupportingInformationrevision.docx](#)
- [SITable1revised.xlsx](#)