

Agenda Date: June 20, 2002
Agenda Placement: Regular
Estimated Time: 15 minutes
Continued Item: No

Board Agenda Item

TO: Air Pollution Control District Board

FROM: Douglas W. Allard, Air Pollution Control Officer

CONTACT: Kathy Patton (961-8852), Tom Murphy (961-8857), Ray McCaffrey (961-8826)

SUBJECT: Board Comments on EPA Proposed Rulemaking on Marine Engines

RECOMMENDATION:

- 1) Receive a briefing from staff on recent developments in the Marine Shipping Retrofit Program.
- 2) Authorize the Board Chair to sign a letter to EPA commenting on their proposed rulemaking to reduce emissions from large ship marine engines.

DISCUSSION:

In November 2001, your Board adopted the 2001 Clean Air Plan. The plan identified marine shipping as a major contributor to our existing emissions and as an emissions source that is anticipated to grow substantially in future years. Your Board directed staff to “take aggressive actions to influence the United States Environmental Protection Agency to reduce the air quality impacts of emissions from marine shipping.”

In April 2002, your Board received a briefing on our activities in working with Board Chair DeWayne Holmdahl to pursue ways to reduce emissions from the marine shipping sector. We continue to work with agencies, lawmakers and shippers to inform them of Santa Barbara’s concern with and interest in reducing marine shipping emissions. We are participating in an Incentives Workgroup to learn more about the shipping industry and what incentives might be interesting to them in reducing ozone precursor emissions from their ships. We are updating our NOx emissions inventory, as well as exploring possible ways to reduce oxides of sulfur (SOx) and particulate matter (PM).

PROPOSED RULEMAKING

On April 30, EPA released the proposed rule “Control of Emissions of Air Pollution from New Marine Compression-Ignition Engines at or Above 30 Liters/Cylinder.” This rule sets emission standards for large ocean-going vessels. We have taken the opportunity to review and comment on this document, and have prepared a comment letter to EPA for your Board’s signature.

The comment letter addresses several areas of the proposed rule that could be strengthened. The proposed rule as written applies to new engines on U.S. flagged ships only, and essentially endorses the standards proposed in an international agreement known as MARPOL 73/78 Annex VI “Regulations for the Prevention of Air Pollution from Ships” by the International Maritime Organization. The Annex VI requirements are primarily designed to reduce oxides of nitrogen (NO_x); the requirements will not be in effect until at least 15 member states comprising 50 percent or more of the world’s gross shipping tonnage approve Annex VI. As major ship engine manufacturers already make engines that meet the Annex VI emissions standards, we feel that EPA’s proposed standards are not stringent enough, and have suggested that technology-forcing standards with timelines be included. Also, as most of the shipping that transits our coastline is foreign flagged, a rule that applies to US flagged ships only will do little to help us attain and maintain our health-based air quality standards; we suggest the rule apply to both US and foreign flagged ships. In addition, the rule applies to new engines only. As fleet and engine turnover is very slow, we suggest that the rule explore possible incentive programs or other requirements that will reduce emissions from existing fleets of ships.

Additional comments are contained in the attached letter. We recommend that your Board authorize the Board Chair to sign the attached letter to EPA commenting on their proposed rulemaking to reduce emissions from large ship marine engines.

An EPA hearing on the proposed standards is set for June 13, 2002. Your Control Officer will testify at that hearing, emphasizing the impact of these vessels on Santa Barbara County’s air quality and asking EPA to act decisively to reduce emissions from this source. Since we may obtain additional information after the June 20 Board hearing, but before the July 16 deadline for comments, staff may send a letter supplementing the proposed comments from your Board.

SPECIAL INSTRUCTIONS:

Clerk of the Board, please return a Minute Order documenting the Board’s action on Item 2 to the first contact named above.