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Board Agenda Item

TO: Air Pollution Control District Board

FROM: Dave Van Mullem, Air Pollution Control Officer

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SUBJECT: Letter to the U.S. Delegation to the International Maritime Organization on Implementing NOx Standards for Ship Engines in the North American Emission Control Area

RECOMMENDATION:

Receive an update on a recent proposal by the International Maritime Organization (IMO) to delay implementation of nitrogen oxides (NOx) limits for new ship engines in Emission Control Areas until 2021, and authorize Chair to sign attached letter encouraging vigorous efforts by the U.S. Delegation to urge the IMO to retain the original deadline of 2016.

DISCUSSION:

At its May 2013 meeting, the IMO's Marine Environment Protection Committee voted to circulate a proposal to delay implementation of NOx limits for new ship engines operating in Emission Control Areas, including the North American Emission Control Area, for five years— from 2016 to 2021. The U.S. Delegation to the Committee voted against proposing a delay, but delegations from other countries prevailed. The IMO Committee is expected to take final action on this proposal in March of 2014.

Most of the ships transiting along the Santa Barbara County coast are foreign-flagged, and the agency with international regulatory authority over these ships is the IMO. Over the years, the District has urged the U.S. Environmental Protection Agency (EPA) to adopt NOx standards for U.S.-flagged ships and to call on the IMO to take international regulatory action.

In 2011, at the request of the U.S. and Canada, the IMO established the North American Emission Control Area (ECA), which became effective in August 2012. Ships traveling within 200 nautical miles of the North American coast are required to meet a number of fuel and engine standards that are being phased in over time. As part of the ECA regulations, the most stringent NOx standards (Tier 3 level) for new ship engines were established to become effective in 2016. Even with the

original 2016 deadline it will take some time to realize NO_x emission reductions from the shipping fleet through this provision, as it applies only to new ship engines. Nevertheless, the new Tier 3 engines produce 80% less NO_x emissions than the engines currently in use.

NO_x is a precursor to ozone, and Santa Barbara County does not meet the state ozone standard and only attains the federal ozone standard by a slim margin. Santa Barbara County Air Pollution Control District does not have regulatory authority over these ship engines, and we have a strong concern about the proposed delay of five years for implementation of these standards.

The attached letter is addressed to three federal agencies that are active on the U.S. delegation to the IMO Marine Environment Protection Committee: the U.S. Coast Guard, which leads the delegation; the U.S. Environmental Protection Agency; and the U.S. Department of State. We will provide copies of this letter to a number of other individuals listed on page two of the attached letter.