

South Coast Air Quality Management District

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*Office of the Executive Officer
Barry Wallerstein, D.Env.
909.396.2100, fax 909.396.3340*

June 22, 2010

Mr. James Goldstene
Executive Officer
California Air Resources Board
1001 I Street
Sacramento, CA 95812

Dear Mr. Goldstene:

SCAQMD Staff Support of the Proposed Amendments to the
Regulations to Reduce Emissions from Diesel Engines on Commercial Harbor Craft
Operated Within California Waters and 24 Nautical Miles of the California Baseline

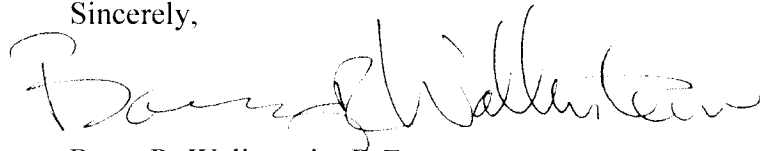
The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to provide comments on the proposed amendments to the Commercial Harbor Craft (CHC) Regulation. The amendments would subject crew and supply vessels, barges, and dredges to the in-use engine requirements of the proposed regulation. The AQMD staff supports the addition of these vessels to the regulation that will result in needed nitrogen oxide (NO_x) and fine particulate (PM) emission reductions in 2014 to help meet the federal annual PM_{2.5} air quality standards. In addition, the proposed amendments achieve greater PM emission reductions than called for in the 2007 SIP.

As you are aware, the U.S. Environmental Protection Agency (EPA) is considering tighter air quality standards for ozone. As such, we believe that additional NO_x emission reductions will ultimately be needed and could be realized through enhancements to the CHC regulation in its entirety. The current regulation including the proposed amendments does not require existing harbor craft vessels to convert to Tier 4 exhaust emissions standards. We believe that it will be necessary to go beyond the current regulation and proposal, which would require only Tier 2 or Tier 3 emissions upgrades, and consider requiring existing vessels to ultimately meet Tier 4 emission levels. We agree there are significant challenges in developing Tier 4 upgrades for existing vessels. However, we believe that there is sufficient time available and efforts being expended by engine and after-treatment control manufacturers as they develop new engine technology to meet the 2016 Tier 4 emission standard for engines over 800 hp, to reasonably ensure development of appropriate retrofits for engines in existing vessels.

Relative to the remainder of existing vessels that have engines with less than 800 hp, we understand that there are no Tier 4 marine engine standards. However, we believe that advances made in off-road engine controls to meet Tier 4 off-road engine exhaust standards, could be used depending on the configuration of the existing engine compartment. The current proposed amendments by CARB staff do allow for such use of off-road engines.

Thank you again for the opportunity to provide these comments. If you have any questions about these comments, please feel free to call me or Mr. Henry Hogo, Assistant Deputy Executive Officer – Mobile Source Division, Science and Technology Advancement, at (909) 396-3184.

Sincerely,

A handwritten signature in black ink, appearing to read "Barry R. Wallerstein". The signature is fluid and cursive, with a large initial "B" and "W".

Barry R. Wallerstein, D.Env.
Executive Officer

CSL:HH:RP