

DRAFT

Proposal to Provide Emissions Equivalency between the Proposed CARB Regulation and Full Implementation of MARPOL Annex VI

Proposal Regulatory Language Modification

CARB includes language in the current regulation that it will only be enforced if any of the following conditions fail to occur:

- 1) IMO fails to approve the amendments to MARPOL Annex VI at MEPC 58 in October 2008.
- 2) EPA fails to achieve designation of an Environmental Control Area (ECA) under the terms and conditions of the MARPOL Annex VI amendments and the Marine Pollution Prevention Act of 2008, on or before March 1, 2010.
- 3) Equivalent emission reductions efforts are in place to make up the differences between the proposed CARB regulation and the MARPOL Annex VI ECA provisions off California.

Emission Reduction Schedule Differences between CARB and MARPOL Annex VI

- 1) July 1, 2009 - CARB distillate fuel requirement (any MGO or 0.5% S MDO) to March 1, 2010 – MARPOL Annex VI ECA with 1.0% S fuel requirement
- 2) March 1, 2010 – MARPOL Annex VI ECA with 1.0% S fuel requirement to December 31, 2011 – CARB distillate (any MGO to 0.5% S MGO)
- 3) January 1, 2012 - CARB 0.1% S distillate fuel requirement to January 1, 2015 – MARPOL Annex VI ECA 0.1% S fuel requirement
- 4) January 1, 2015 MARPOL Annex VI ECA sunsets CARB regulation

Ways Equivalency Could be Achieved.

Convene the Marine Technical Working Group comprised of CARB, EPA, local air districts, Port authorities, academics, environmental groups, and industry, to evaluate measures to achieve equivalent emission reductions with the proposed CARB regulation, including but not limited to:

- 1) Expand the Port of Los Angeles/Port of Long Beach Marine Fuel Incentive Program that requires 0.2% S distillate fuel throughout California providing greater benefits than the regulation until the January 1, 2012 date.
- 2) Modify the Marine Fuel Incentive Program to 0.1% S distillate fuel on or before January 1, 2012 to maintain equivalency until 2015.
- 3) Continue voluntary use of distillate fuel in auxiliary engines.
- 4) Investigate the potential of an North American ECA designation with EPA that would require 0.1% S distillate fuel prior to 2015.
- 5) Investigate an ECA boundary further from California coast that will provide emission benefits beyond those of the proposed regulation 24 nm limit.
- 6) Provide for technology advancements and demonstrations projects such as:
 - a) on-board fuel emulsifiers
 - b) Advanced Marine Emission Control System (sock on a stack)
 - c) sea water scrubbers
 - d) selective catalytic reduction
 - e) particulate filters
 - f) others