

MARINE ENVIRONMENT PROTECTION
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Agenda item 3

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AIR POLLUTION AND ENERGY EFFICIENCY

Operational compliance with NO_x Tier III requirements

Submitted by the Institute of Marine Engineering, Science and Technology (IMarEST)

SUMMARY

Executive summary: This document comments on document MEPC 68/3/8 which proposes an alternative approach to that agreed at PPR 2 in respect of the recording of the change-over between tier II and tier III operating conditions. For the reasons given in this document it is proposed that the agreed outcome of PPR 2 should be retained.

Strategic direction: 7.3

High-level action: 7.3.1

Planned output: 7.3.1.1

Action to be taken: Paragraph 9

Related documents: MEPC 68/3/8 and PPR 2/21

Introduction

1 This document is submitted in accordance with paragraph 6.12.5 of the *Guidelines of the Organization and methods of work of the Maritime Safety Committee and the Marine Environment Protection Committee and their subsidiary bodies* (MSC-MEPC.1/Circ.4/Rev.3) and comments on document MEPC 68/3/8.

Discussion

2 PPR 2 considered recording the operating condition, on entry or exit from emission control areas set out in regulation 13.6 of MARPOL Annex VI, of engines capable of both tier II and tier III operation installed on ships to which the NO_x emission limit set out in regulation 13.5.1.1 of MARPOL Annex VI applies. Paragraph 2.26 of document PPR 2/21 and paragraph 20 of annex 2 to document PPR 2/21 present the outcome, in which it is proposed that a new paragraph 6.1.2, text as given therein, be inserted into chapter 6 of the NO_x Technical Code 2008.

3 In contrast to the outcome of PPR 2, document MEPC 68/3/8 proposes a new paragraph 5.3 of regulation 13 of MARPOL Annex VI covering the recording of the operating condition of engines which have the capability of operating to either tier II or tier III emission limits. Although not specifically stated, it is assumed that the proposal in paragraph 9 of document MEPC 68/3/8 is intended to be an alternative to the proposed new paragraph 6.1.2 of the NO_x Technical Code 2008 – otherwise there would be two separate recording requirements regarding the change-over date, time and ship's position.

4 The proposal set out in document MEPC 68/3/8 mirrors the requirement set out in regulation 14.6 of MARPOL Annex VI on the recording of certain information on entry or exit from emission control areas. However, unlike regulation 14 (the SO_x and particulate matter regulations), the NO_x regulations (regulation 13) are supported by the NO_x Technical Code 2008. Regulation 5.3.2 of MARPOL Annex VI specifically states that the survey of marine diesel engines and equipment for compliance with regulation 13 shall be conducted in accordance with the NO_x Technical Code 2008. This requirement is considered as being equally applicable to port State inspections as set out in paragraphs 2.1.3 and 2.2.2 of resolution MEPC.181(59) on *2009 Guidelines for port State control under the revised MARPOL Annex VI*. Therefore, it is proposed that all requirements concerning the survey (or inspection) related to regulation 13 compliance should, in order to retain a single line of reference, be set out in the NO_x Technical Code 2008 and not, as proposed by document MEPC 68/3/8, be included as part of the regulation.

5 The text of the proposed new paragraph 5.3 presented in paragraph 9 of document MEPC 68/3/8 reads as follows: "The operational mode of all engines installed on board to which this regulation applies shall be recorded in the ship's official log book". As "this regulation" applies to engines over 130 kW installed on ships constructed on or after 1 January 2000 and to engines subject to major conversion, as defined, on or after that date, this would imply that all such engines would need to be so recorded, rather than, as in the proposed new paragraph 6.1.2 to the NO_x Technical Code 2008, only those capable of either tier II or tier III operation.

6 Document MEPC 68/3/8 proposes that the required record be made in the official log-book. However, this will split the recording requirements which would result from a change-over between tier II and tier III operating conditions. Apart from the direction given by regulation 5.3.2 of MARPOL Annex VI regarding NO_x-related surveys, the change-over between tier II and tier III operation will, in all cases where the parameter check method is used as the onboard NO_x verification procedure, necessitate entries in the record book of engine parameters, as per paragraph 6.2.2.7.1 of the NO_x Technical Code 2008, in respect of those actions taken. Therefore, IMarEST suggests that it is preferable that all related records are kept in a single engine-specific system. Note that entries in the record book of engine parameters are to be entered chronologically, as per paragraph 6.2.2.8 of the NO_x Technical Code 2008; therefore, where, for example, a port State control inspector requires to check tier III compliance, both the change-over time and ship's position would be recorded adjacent to the actions actually taken to effect that tier III performance.

7 Document MEPC 68/3/8 proposes that the operating condition of engines in stand-by mode also be recorded together with those which are being retained in their tier II condition, because they are not intended to be used while within the emission control areas set out in regulation 13.6 of MARPOL Annex VI. IMarEST notes that the requirement in regulation 13.5.1 (and regulations 13.3 and 13.4) of MARPOL Annex VI is in terms of engine operation rather than in terms of possible operation in the future. This would therefore constitute a significant extension of this particular control, which by inference would be equally applicable to all other requirements as set out in MARPOL Annex VI.

8 In view of the above, IMarEST proposes that the outcome in respect of the recording of engine operation condition as agreed by PPR 2 (paragraph 20 of annex 2 to document PPR 2/21) should be retained.

Action requested of the Committee

9 The Committee is invited to note the information provided, the proposal made in paragraph 8 and to take action as deemed appropriate.
