



THE REPUBLIC OF LIBERIA

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Office of
Deputy Commissioner
of Maritime Affairs

7 November 2013

Marine Advisory: 05/2013

This Marine Advisory supersedes Marine Advisory 10/2012

SUBJECT: United States Caribbean Sea and North American Emission Control Area (ECA) under MARPOL Annex VI

Ref:

- (a) MARPOL Annex VI, Regulations 13, 14, 18 and Appendix VII**
- (b) Marine Notice POL-009**
- (c) United States Environmental Protection Agency (EPA) memorandum dated June 26, 2012**
- (d) CG-CVC Policy letter 12-04 dated 25 July 2012 'Guidelines for Compliance and Enforcement of the Emission Control Areas established within the United States Jurisdiction as designated in MARPOL Annex VI Regulation 14'**
- (e) Transport Canada Ship Safety Bulletin 04/2013**

Dear Shipowner/Operator:

This advisory combines information previously provided on the North American Emission Control Area (ECA), which entered into effect on 1 August 2012, with information on the entry into effect of the United States Caribbean Sea ECA from 1 January 2014.

The sea area located off the Atlantic and Caribbean coasts of the commonwealth of Puerto Rico and the United States Virgin Islands, (up to roughly 50 nautical miles from the territorial sea baselines of the included islands) was designated as the United States Caribbean Sea ECA for reduction of Nitrogen oxides (NO_x), Sulphur oxides (SO_x) and Particulate Matter (PM) emissions under Regulations 13 and 14 of MARPOL Annex VI in July 2011. Ships entering the United States Caribbean Sea ECA shall comply with lower emissions standards for SO_x and PM when transiting the area starting 1 January 2014.

The North American ECA covers three distinct areas:

1. Off the North American Atlantic/Gulf Coasts;
2. Off the North American Pacific coast; and
3. Around certain parts of Hawaii.

It also includes the St. Lawrence Seaway, the Great Lakes and rivers (such as Mississippi) which are

accessed by international shipping.

The new appendix VII to MARPOL Annex VI contains the definition and boundaries with full coordinates of the United States Caribbean Sea and North American ECA's. Diagram showing geographical distribution of the United States Caribbean Sea and North American ECA is set out in Annex 1 to this Advisory.

Requirements within the United States Caribbean Sea and North American ECA: The sulphur content of fuel oil used on board shall not exceed 1.00% m/m, while ships are operating in the North American ECA; on and after 1 January 2014 while ships are operating in the United States Caribbean Sea ECA. Ships operating in these ECA's must use fuel that does not exceed 0.10% m/m on and after 1 January 2015.

The United States Coast Guard (USCG) has published guidelines for compliance and enforcement of the emission control areas, which may be obtained on the link to the USCG's website

http://www.uscg.mil/d13/cfvs/CheckLists/Regs/MARPOL_VDPolLtr12-09.pdf

Guidance on the Non-Availability of Compliant Fuel Oil: The United States EPA has published "Interim Guidance on the Non-Availability of Compliant Fuel Oil for the North American ECA", this may be obtained on the link to the United States EPA website

<http://www2.epa.gov/sites/production/files/documents/finalfuelavailabilityguidance-0626.pdf>

Transport Canada has published Ship Safety Bulletin 04/2013 'Reporting When Compliant Fuel is Unavailable'; which may be obtained on Transport Canada website

<http://www.tc.gc.ca/eng/marinesafety/bulletins-2013-04-eng.htm>

This guidance addresses how the United States EPA and Transport Canada will implement fuel oil availability provisions of MARPOL Annex VI, Regulation 18 for shipowners and operators unable to obtain compliant fuel oil meeting the 1.0% m/m (10,000 ppm) sulphur standard (e.g., lack of fuel oil availability) applicable to ships operating in the North American and United States Caribbean Sea ECA's.

For vessels that operate in the United States 'North American ECA' a Fuel-Oil Non-Availability Report containing the information listed in the interim guidance is required to be submitted to e-mail address: marine-eca@epa.gov, until an electronic reporting system is being developed.

For vessels destined to a Canadian port, form #85-0493 'Compliant fuel oil non-availability report-North American Emission Control Area (NA-ECA)' which may be obtained using the link in Transport Canada Ship Safety Bulletin 04/2013 'Reporting When Compliant Fuel is Unavailable' is required to be submitted to:

- For the East Coast and Quebec: email TCMSDutyOfficer-TCSMOfficierdepermanence@tc.gc.ca or fax (902) 426-6657
- For the West Coast: email offshore@rmic.gc.ca or fax (604) 666-9177

A copy of the report shall also be sent to the Administration at email address: investigations@liscr.com

Operational Requirements: Ships using separate fuel oils entering or leaving an ECA must carry a written procedure on how the fuel oil change-over is to be conducted, allowing sufficient time for the fuel oil service system to be fully flushed of all fuel oils exceeding the applicable sulphur content prior to entry into an ECA. The volume of low sulphur fuel oils in each tank as well as the date, time, and position of the ship when any fuel-oil-change-over operation is completed prior to the entry into an ECA or commenced after exit from such an area, shall be recorded in the engineering log book or other record book suitable for that purpose.

Operational Guidance: Low and high sulphur fuel has to be stored in different tanks. Different grades of cylinder oils may have to be carried if operating with low sulphur fuel for any length of time to prevent excessive calcium deposits and resultant liner wear. If low sulphur fuels are used, high wear rates may be experienced with fuel injection equipment.

Fuel Oil Quality: Refer to reference (a) and (b).

Questions regarding this Advisory should be directed to Safety Department at + 1 703 790 3434 or safety@liscr.com

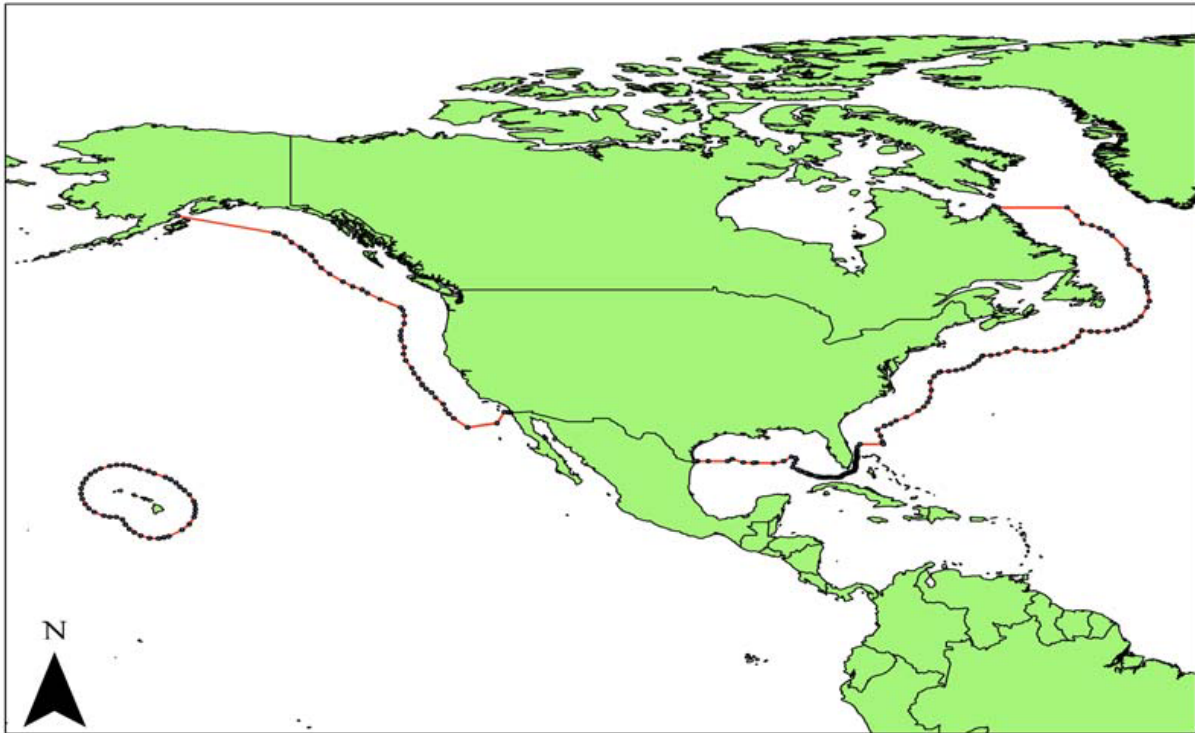
Annex 1 – Graphic view of North American and United States Caribbean Sea ECA's

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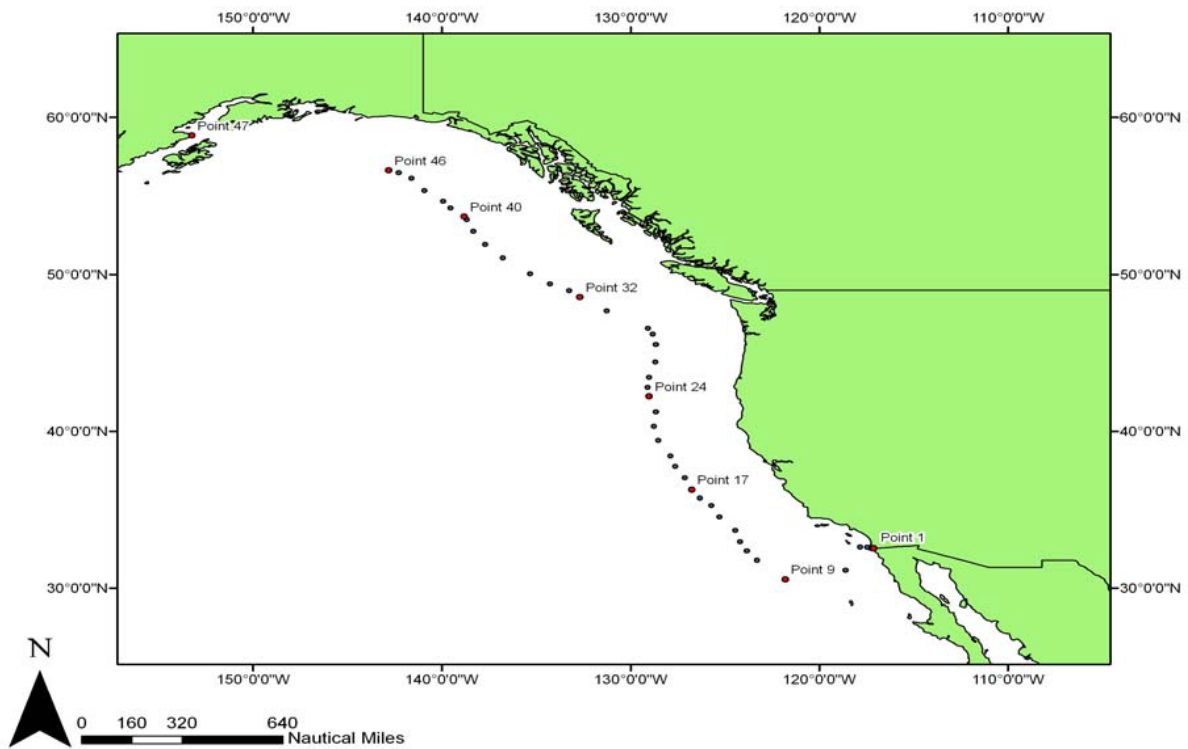
Annex 1

GEOGRAPHICAL DISTRIBUTION OF THE NORTH AMERICAN EMISSION CONTROL AREA

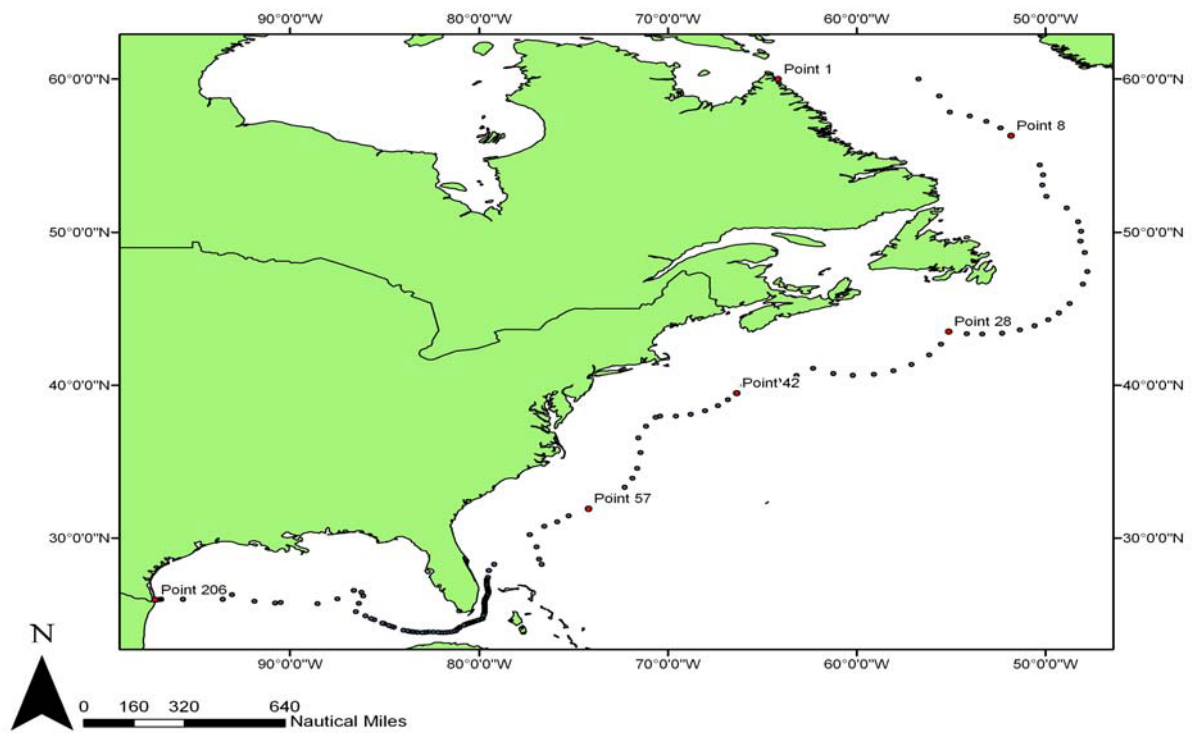
1. General view of the North American Emission Control Area



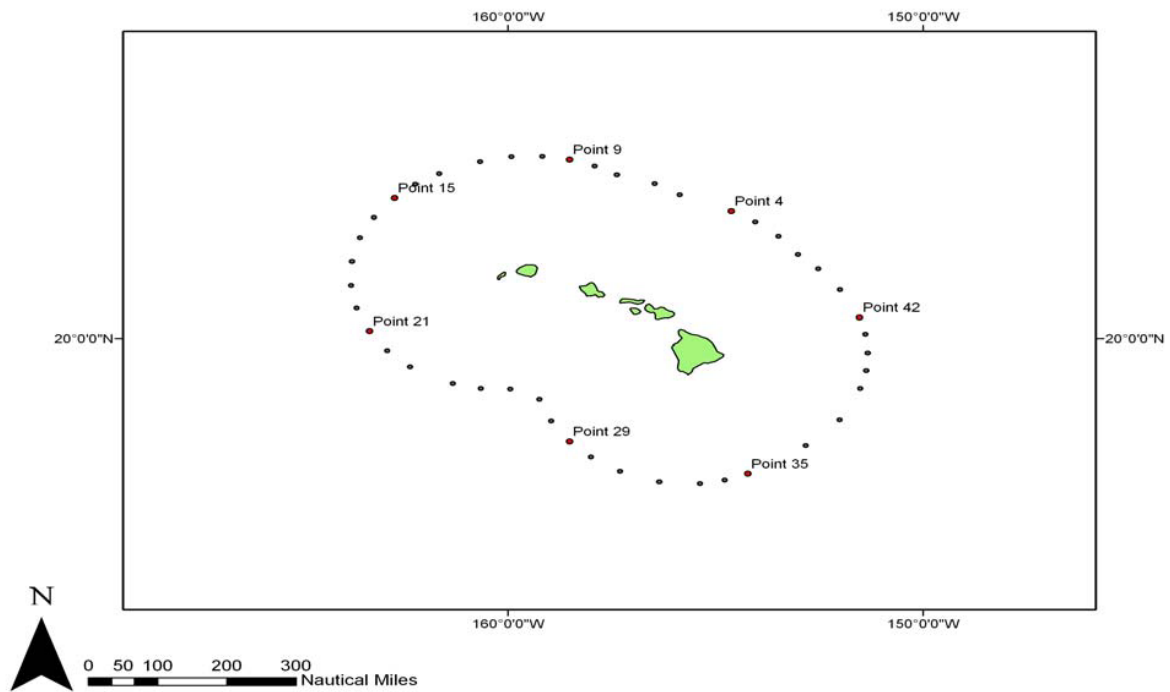
2. Magnified view of the Pacific Coast



3. Magnified view of the Atlantic coast and the Gulf of Mexico coast



4. Magnified view of the Hawaiian Islands



GEOGRAPHICAL DISTRIBUTION OF THE UNITED STATES CARIBBEAN SEA ECA

