



Guidance for Submitting Written Comments Regarding EPA's Proposed Standards for Evaporative Emissions from Boat Fuel Systems and Exhaust Emissions from Recreational Marine Engines

EPA Rule: Notice of Proposed Rulemaking for Control of Emissions for New Non-road Spark-Ignition Engines, Equipment, and Vessels. (72 Federal Register 28098, May 18, 2007)

Mail Comments to: Public Docket # EPA-HQ-OAR-2004-0008 US Environmental Protection Agency, Air and Radiation Docket and Information Center (6102T) 1200 Pennsylvania Ave. NW, Washington DC 20460

E-mail Comments: A-and-R-Docket@epa.gov

Comments Due Date: August 2, 2007

Opening paragraph:

Begin your written comments with a description of your company, its products, where you are located, how many employees you have, your customers, etc. If you are a small business defined as less than 500 employees, mention that.

Main Points boat builders will want to make regarding;

Engines in Boats

If you use SD/I engines

EPA is proposing that SD/I engines meet the catalyst standards by January 1, 2009. For boat builders this will mean having to install these engines with the on board diagnostic emission notification systems, similar to the "check engine soon" light in your car. In the case of boats it will be a buzzer. Boat builders will want to make this point. Raise the concern that your company will only support 2011 as the implementation date for a national marine catalyst rule. State that it is your understanding that catalyst has not been fully tested in salt water and in lieu of this testing it is critical that these systems, which will be introduced in California in 2008, be operated by consumers for the full three year warranty period that EPA is imposing on our products. If our company has a national recall because of a failure of the catalyst or diagnostic system, the quality image of the boat builder will suffer equally if not more than the engine manufacturer.

If you use Outboards

EPA is proposing that outboards meet the CARB 2008 emission standards in 2009. For boat builders this will mean that there could be shortages of outboards in certain horsepower ranges. Outboard manufacturers have been anticipating turning over their fleet to meet the CARB 2008 standards nationally by 2010. Most engines will comply in 2009, but one more year will allow for a smoother transition. This is a key issue for the independent small business boat builders to explain to EPA that their ability to remain competitive depends on their ability to continue to supply their customers with a variety of engines. By setting an aggressive compliance date, EPA is creating a competitive disadvantage for the small business independent boat builders who may not be able to get the engines they need. By allowing one year, it is our understanding that this is not an issue.

Issues Specific to Boat Fuel Systems

Low permeation fuel hose

EPA is proposing that boat builders install low permeation hose by January 1, 2008. EPA will not have a final rule until at least then. Boat builders need to tell EPA that they need until January 1, 2009 in order to deplete their inventory and learn what exactly they must do to meet the certification requirements. Use this opportunity to explain that your company has never had to certify their boats for emissions with EPA and you do not have staff with trained or assigned for this function. Ask EPA if they plan to provide training sessions so that your staff knows what they have to do to comply with these new regulations.

Carbon canisters for controlling vent emissions

NMMA supports the need for diurnal emission requirements from boat fuel systems, but we have serious reservations regarding the safety of the current technology when applied to recreational marine use. A clogged canister or fuel vapor separator would create a pressurized fuel system, which USCG accident records have clearly documented as a hazardous situation. State any concerns you may have for this technology. Recommend that time be allowed for testing and application.

Labeling

For every technical requirement, EPA has designated a certification / labeling requirement for the boat. As the proposal reads now, the labeling requirements are vague and confusing. EPA needs to simplify this process and work with NMMA and ABYC to create a universal compliance label and location.

Fuel spillage and spit back

The proposal requests that ABYC work with its committees to develop an industry standard for preventing spit back during re-fueling. Explain to EPA that the infinite combinations of vehicles and trailers cause incalculable fill angles. Also the need for an “open” system as well as specific installation locations for both fill and vent openings make it impossible to come up with a simple solution to resolving this problem.

Questions

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