

Compliance Division Office of Transportation & Air Quality Environmental Protection Agency

MARINE DIESEL ENGINE & VESSEL PROGRAM IMPLEMENTATION JANUARY 18, 2024



Annual Vessel Compliance Reports



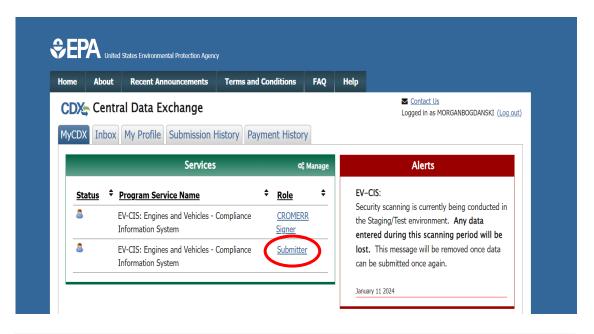
Annual Reports for Category 3 Vessels

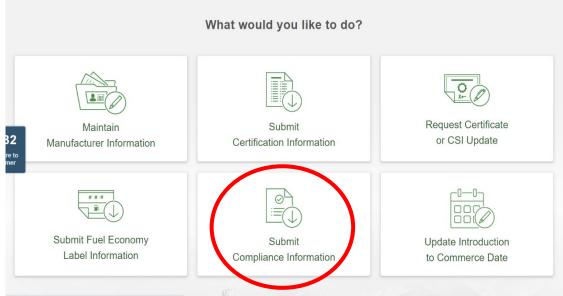
- Vessel owners and operators of certain vessels are subject to an annual reporting requirement published at 40 CFR 1042.660(d)
- Subject vessels = US-flagged vessels where at least one of the installed engines has per-cylinder displacement at or above 30 liters ("Category 3") and was built on or after January 1, 2004.
- The report to EPA must be signed by the executive with responsibility for marine activities of the owner, or a duly authorized primary operator.



Report Purpose & Content

- Certify full compliance with relevant applicable requirements* during the previous year, OR...
- Certify there has been one or more instances of noncompliance with applicable requirements during the previous year
 - Include the nature of the noncompliance, the time of the noncompliance, and efforts made to remedy the noncompliance
- * Such as use of correct fuels & lubricants, maintenance of emission control systems, recordkeeping (see 40 CFR 1042.660)

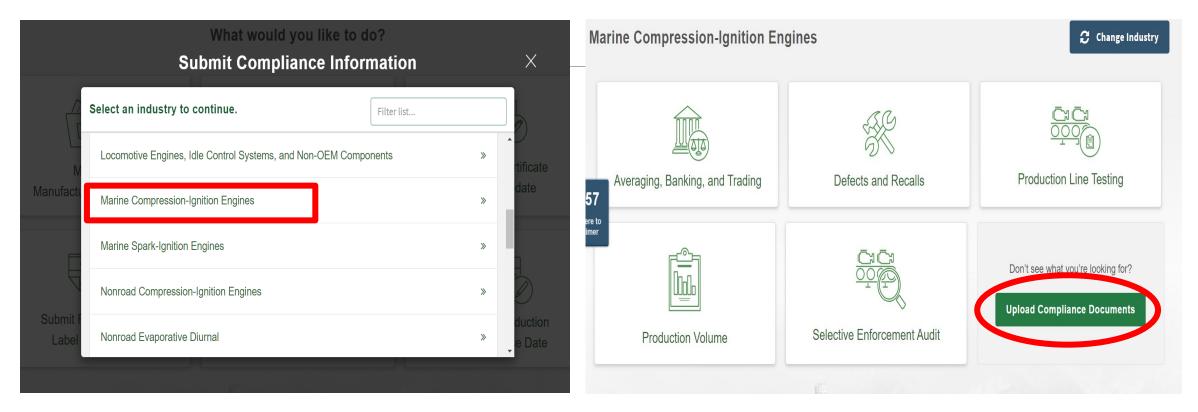




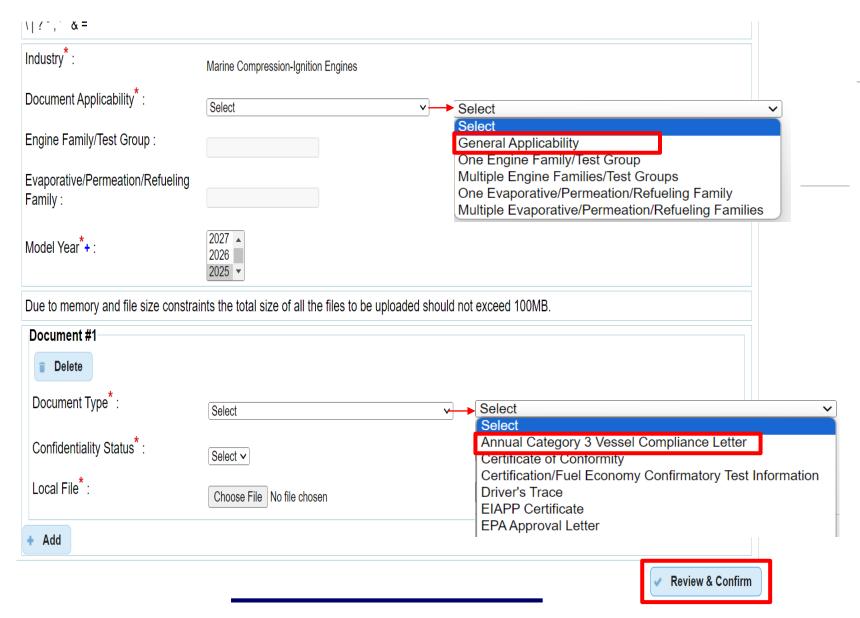
CDX Annual Report Submission Process

- From your MyCDX page select the link for the submitter role
- Select "Submit Compliance Information"

Selecting Industry and Document Submission Type



- Select "Marine Compression-Ignition Engines"
- Then select "Upload Compliance Documents"



Uploading Compliance Document

- Select "General Applicability" under Document Applicability
- Select a Model Year (the calendar year of reporting period)
- Document type is "Annual Category 3 Vessel Compliance Letter"
- Select appropriate confidentiality status - CBI or FOI (generally releasable without review)
- Upload your completed compliance reporting template document
- Select "Review & Confirm" to submit document



Reporting Deadline

- There is not a reporting deadline established in our regulation. We have received suggestions indicating a reporting cadence with a due date each March would be convenient.
- For expedience, our expectation is for reports to be submitted within 90 days after the end of each calendar year.



Live Demo for Reporting Template



- Request an EPA Manufacturer Code
 - To do business in EV-CIS, you will need an EPA Manufacturer Code
 - To submit a request for a code, follow the instructions in the <u>user guide</u> for requesting a manufacturer code
 - This requires one user to create a temporary CDX account. This account is only used to submit the request. New CDX accounts will need to be created once the code is issued before documents can be submitted into EV-CIS.
 - EPA will email the 3-character alpha-numeric code to the person who submitted the code request - Allow approximately 3 business days after the code request has been submitted to receive your code



- Establishing EV-CIS Accounts
 - Upon receipt of the manufacturer code, you can proceed with establishing EV-CIS accounts with the necessary roles to do business in EV-CIS
- There are Three Roles for EV-CIS
 - Company Approving Official (CAO) Identifies, vouches for, and manages EV-CIS "Submitters" and "CROMERR Signers"
 - **CROMERR Signer** Requests certificates and takes legal responsibility for all the information used as the basis for a request for certificate
 - Submitter Submits certification and compliance documentation
 - Only the CAO and Submitter roles will be needed for this reporting activity



- Establish a CAO using the Role Sponsorship Process
 - You must establish at least one CAO
 - The CAO will be responsible for sponsoring themselves and/or others for the submitter role
 - Step by step instructions for initiating the process begin on page 21 in the <u>Role Sponsorship User</u> Guide.
 - As you go through the steps you will be prompted to a template on our website for a <u>CAO Sponsor</u> Letter
 - This letter needs to be ink-signed by someone other than the person being sponsored as the CAO and mailed to the address on the template
 - You will also be required to complete identity verification
 - This can be done electronically or by paper as explained in the role sponsorship user guide above



- EPA is responsible for approving the CAO role
 - Upon completion of the steps in the user guide, send an email to Holly Pugliese at pugliese.holly@epa.gov and include a PDF of the signed CAO sponsor letter
 - EPA will approve the CAO role and the CAO can then sponsor themselves and/or others for the submitter role
 - Step by step instructions for initiating the process of sponsoring submitters begins on page 49 in the Role Sponsorship User Guide
 - CAOs are responsible for approving submitter roles
 - Upon completion of the steps for sponsoring submitters, the CAO will approve the roles as detailed starting on page 102 of role sponsor user guide above
 - You are now ready to submit documents into EV-CIS



Helpful Hints

- Before you begin establishing your EV-CIS roles, carefully read through <u>Role</u>
 <u>Sponsorship User Guide</u>
 - There are numerous steps involved and multiple emails that need to be acted on as you go through the process for both CAO and submitter roles
 - The process may feel cumbersome, but if you follow the user guide, you should not run into any issue
- If you do run into any issues, don't struggle. Send an email to Holly at pugliese.holly@epa.gov



EPA List Servers

- Subscribe to EPA List Servers
 - At least one person should subscribe to the EV-CIS List Server and the Manufacturer
 Information Letter List Server
 - These list servers are used to communicate a variety of things related to the system, including outages, enhancements, webinars, etc.
 - Each person who wants to be added should send a blank email to the addresses below to be added to each:

<u>evcis-subscribe@lists.epa.gov</u> <u>manufacturer-info-subscribe@lists.epa.gov</u>



EPA Contacts

- Allen Duncan, Director, Diesel Engine Compliance Center
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