

Engines and Vehicles – Compliance Information System (EV-CIS) **Marine CI Module Revisions – Explained**

December 1, 2017

Purpose

The purpose of this document is to provide users additional information about the revisions included in the December 2017 system maintenance deployment which includes changes to the Marine CI certification module of the Engines and Vehicles – Compliance Information System (EV-CIS, formerly known as Verify). This help document is being provided due to the scope and magnitude of the improvements to the certification process through the system. This document does not supersede or replace any regulatory requirements of the Clean Air Act or MARPOL.

Table of Contents

- A. Families subject to parts 1042 and 1043 must be certified jointly
 - (a) What constraints has EPA applied to ensure families are jointly certified?
 - (b) What features have been added to facilitate manufacturers meeting these requirements?
 - (1) Certificate Type Data Element Has Been Redefined
 - (2) Manufacturers Must Justify Why a Certificate Is Not Required for a Family
 - (3) Manufacturers Must Identify Test Procedure Used to Generate Test Results
 - (a) What tests must I now submit?
 - (b) How do I reference previous tests that did not specify a Test Procedure Used?
 - (4) Manufacturers Can Bypass Issuance of EIAPP Certificates
 - (a) What data are required to allow me to bypass issuance of an EIAPP Certificate?
 - (b) How do I request only a Certificate of Conformity?
 - (5) What if I only need to revise one of my certificates?
 - (a) What if I only need to update the Certificate Summary Information (CSI)?
- B. New text will be added to EIAPP certificates: Limited Application or Tier III Family

A. Families subject to parts 1042 and 1043 must be certified jointly

EPA has issued guidance that families subject to Parts 1042 and 1043 must be certified jointly. Revisions to the Marine CI certification process have been implemented to ensure this is consistently done, as well as to facilitate meeting this requirement.

(a) What constraints has EPA applied to ensure families are jointly certified?

Data elements have been added/revised to ensure that manufacturers are accurately identifying which certificates must be held for their families. See the following sections for details—

- [Certificate Type Data Element Has Been Redefined](#)
- [Manufacturers Must Justify Why a Certificate Is Not Required for a Family](#)

(b) *What features have been added to facilitate manufacturers meeting these requirements?*

Data elements have been added to ensure that manufacturers can 1) differentiate between the test procedures used for Parts 1042 and 1043; and 2) bypass issuance of EIAPP Certificates that are valid for multiple years and do not need to be requested annually. See the following sections for details—

- [Manufacturers Must Identify Test Procedure Used to Generate Test Results](#)
- [Manufacturers Can Bypass Issuance of EIAPP Certificates](#)

(1) Certificate Type Data Element Has Been Redefined

Previously, the Marine CI module used the Certificate Type (MCI-241) field to ask which types of certificates were being requested. Users will now use the Certificate Type field to indicate which certificates are **required** for the engine family as follows:

- 1 = Certificate of Conformity Only
 - The engine family is only subject to the domestic rules at Part 1042
- 2 = EIAPP Certificate Only
 - The engine family is only subject to the rules implementing the international program at Part 1043
- 3 = Certificate of Conformity and EIAPP Certificate
 - The engine family is subject to both Part 1042 and Part 1043.

Users will now select which certificate(s) they wish to **receive** during the request for certificate process (See [Manufacturers Can Bypass Issuance of EIAPP Certificates](#)).

Example: During annual recertification of a family to Part 1042, if a new version of the EIAPP Certificate is not needed (information displayed has not changed and it hasn't expired), the Marine CI certification application with the new family name must indicate a Certificate Type (MCI-241) of '3' (Certificate of Conformity and EIAPP Certificate) if the engine family is subject to both Parts 1042 and 1043. In this case, you would be able select to receive only a Certificate of Conformity in the Request for Certificate module.

(2) Manufacturers Must Justify Why a Certificate Is Not Required for a Family

If an engine family is subject to only one of the programs, not both, then additional data elements are required to document the applicability of the engine family to the standards, as described below.

- When indicating that only a Certificate of Conformity is required for the family, users must provide one of the following justifications in the Justification for Certificate of Conformity Only (MCI-328) field:
 - D = Domestic use only

- P = Publicly owned vessel
- O = Other
- When indicating that only an EIAPP Certificate is required for the family, users must provide one of the following justifications in the Justification for EIAPP Certificate Only (MCI-330) field:
 - E = Exempt from Clean Air Act standards of Part 94 and Part 1042
 - M = Model Year predates applicable year of Clean Air Act standards
- When indicating that only an EIAPP Certificate is required because the family is exempt from the Clean Air Act standards, users must provide one of the following reasons why it is exempt in the Justification for Exemption from CAA Standards (MCI-331) field:
 - A = Auxiliary Engine on Category 3 Vessel (see 1042.650(d))
 - R = Replacement engine under 1042.615 but not identical (see 1043.30(g))
 - E = Emergency engine under 1042.625 but not meeting 1043.30(d)(4)
 - O = Other
- Before selecting “O = Other” for Justification for Certificate of Conformity Only (MCI-328) or Justification for Exemption from CAA Standards (MCI-331), it is highly recommended that you contact your EPA Certification Representative.

(3) Manufacturers Must Identify Test Procedure Used to Generate Test Results

Manufacturers are now able to identify the test procedure used to generate each set of test results using the Test Procedure Used (MCI-336) field, which can have one of the following values:

- EPA = Part 1065 Test Procedure
- IMO = NOx Technical Code Test Procedure

For engine families subject to only one Part, the value for this field will automatically be selected.

(a) What tests must I now submit?

For Category 1 and 2 engines subject to both Parts 1042 and 1043, the following tests must be included:

- At least one test with Test Procedure Used = ‘EPA’ with test results for NOx, CO, PM, HCs (as required), and GHGs (as required).
- At least one test with Test Procedure Used = ‘IMO’ with a test result for NOx (***and only NOx***).

An additional provision is accommodated for Category 3 engines allowing them to use the NOx Technical Code test procedure to generate test results for CO, NOx, and HC to meet Clean Air Act standards as allowed in Part 1042.501(g). Intent to use this provision is captured using the IMO Test Procedure Used to Meet EPA Standards Indicator (MCI-335) on the General Information tab. Use of this provision applies for all tests reported in the certification application.

For Category 3 engines subject to both Parts 1042 and 1043 which **are not** using the NOx Technical Code to generate test results for CO, NOx, and HC, the following tests must be included:

- At least one test with Test Procedure Used = ‘EPA’ with test results for NOx, CO, PM, HCs (as required), and GHGs (as required).
- At least one test with Test Procedure Used = ‘IMO’ with a test result for NOx (**and only NOx**).

For Category 3 engines subject to both Parts 1042 and 1043 which **are** using the NOx Technical Code to generate test results for CO, NOx, and HC, the following tests must be included:

- At least one test with Test Procedure Used = ‘EPA’ with test results for PM and GHGs (as required). **Do not include EPA test results for CO, NOx, and HCs.**
- At least one test with Test Procedure Used = ‘IMO’ with test results for CO, NOx, and HCs (as required).

Note: The distinction of test procedure is intended to enable EPA and IMO families tested separately to be certified jointly. This new feature does not create any testing requirements beyond what the regulations already specify.

(b) How do I reference previous tests that did not specify a Test Procedure Used?

Users wishing to reference tests uploaded in previous datasets that did not identify the Test Procedure Used will first need to correct the previous dataset. The following steps must be performed to enable referencing earlier tests:

1. Submit a correction to the original dataset to add the Test Procedure Used and supply the appropriate tests as described in this section.
2. Submit a Request for Revised Certificate or CSI Update (as needed) for the family.
3. If a revised certificate needs to be issued, EPA will review the request and issue the revised certificate.
4. Submit the new dataset referencing the test information in the corrected dataset.

(4) Manufacturers Can Bypass Issuance of EIAPP Certificates

Previously, when families were jointly certified to Parts 1042 and 1043, the Marine CI module reissued the EIAPP Certificate as a part of the annual renewal of the CAA Certificate of Conformity. The new features better align the program with the Part 1043 regulations by allowing manufacturers to bypass re-issuance of the EIAPP Certificate, which only expires if the standard becomes more stringent or if the engine design changes.

As indicated in the [Certificate Type Data Element Has Been Redefined](#) section, submitters of the certification application are responsible for indicating which certificates are **required** for a family using the Certificate Type (MCI-241). Identifying which certificates a manufacturer wishes to **receive** is now done by the CROMERR Signer using the Request for Certificate module.

(a) What data are required to allow me to bypass issuance of an EIAPP Certificate?

When subject to Part 1043, the ability to bypass issuance of an EIAPP certificate is only possible if a valid EIAPP Certificate already exists, whether it was issued through the legacy IMS or through EV-CIS (Verify). Additional data elements in the certification application are required to identify an existing EIAPP Certificate and whether one has been issued as described below.

- Indicate whether an EIAPP certificate has already been issued for this engine family in the current or any prior model year using the Valid EIAPP Certificate Already Exists Indicator (MCI-326) field.
- If an EIAPP Certificate has already been issued for the family, enter the family name originally reported to IMS or EV-CIS (Verify) for which the EIAPP Certificate was issued using the Original IMO Engine Family Name (MCI-327) field.
 - *Note:* In this field, you must indicate the **original** engine family that received the most recent valid EIAPP Certificate, even if that EIAPP Certificate was issued through IMS, and even if the family has been recertified since the EIAPP Certificate was issued.

This information will 1) enable the system and/or your EPA Certification Representative to determine whether you meet the criteria allowing you to bypass issuance of a new EIAPP Certificate during annual recertification; and 2) locate the NOx Technical File associated with the original IMO engine family which needs to be identified in the recertification application.

(b) How do I request only a Certificate of Conformity?

Using the new Certificate Type data element in the Request for Certificate module, the CROMERR signer should select the “Certificate of Conformity Only” option. The CROMERR Signer must attest to both the CAA and IMO statements, since the family is subject to both domestic and international programs. Users will also need to identify the NOx Technical File that supported the original EIAPP certificate. Unless this is the first time this family is being certified through EV-CIS (Verify), the previously submitted NOx Technical File will be available to be selected. If the NOx Technical File was submitted when the family was issued through the legacy IMS, the NOx Technical File must be uploaded using the Marine CI Upload Certification Documents interface.

(5) What if I only need to revise one of my certificates?

For engine families subject to one, but not both programs, the CROMERR Signer should select the applicable certificate type when submitting the request for revised certificate.

For engine families subject to both programs, regardless of whether only the EIAPP certificate or the CAA Certificate of Conformity must be revised, you must select both certificate types when submitting your request for revised certificate. This is because the revision numbers on the EIAPP Certificate and CAA Certificate of Conformity must remain consistent.

(a) What if I only need to update the Certificate Summary Information (CSI)?

There is no change to this process. A Certificate Type does not need to be selected in the Request for Certificate module when requesting an update to a CSI.

B. New text will be added to EIAPP certificates: Limited Application or Tier III Family

Manufacturers may request an Annex VI Tier II certificate after 12/31/2015 for engine families subject to Part 1043 under two conditions—1) if the manufacturer requests a Limited Application be applied for the EIAPP Certificate consistent with the provisions in Annex VI allow Tier II instead of Tier III; or 2) if the engine family is also certified to Tier III.

If certifying to Annex VI Tier II standards under Part 1043 after 12/31/2015, manufacturers must provide a justification for doing so using the Justification for IMO Annex VI Tier II After 2015 (MCI-333) field, indicating one or more of the following values which apply to the engines in the family:

- EP = Engine on vessel with exemption from Tier III issued by the USG under Annex VI Reg. 13.5.2.2 and with combined nameplate diesel propulsion power < 750 kW
- RU = Recreational engine on vessel < 24 meters
- RK = Recreational engine on vessel of gross tons < 500, and keel laid date before 1/1/2021
- ET = Engine separately certified to IMO Annex VI Tier III

If any or all of the first three reasons are selected (EP, RU, and/or RK) then the EIAPP Certificate will be printed with these limitations displayed. If one of the reasons selected is EP, then the engine manufacturer should inform its distributors that the engine may not be installed on a vessel absent a finding by the U.S. government contemplated by Annex VI Regulation 13.5.2.2.

If the last reason (ET) is selected, then the manufacturer must additionally provide the family name of the identical engine that was certified to IMO Annex VI Tier III Standards (MCI-334). This family name will also be displayed on the certificate.

Note: Because Annex VI Tier III standards only apply to engines operating on vessels within an ECA, and engines must be certified as meeting Tier II at other times, affected engines must be covered by both a Tier II and Tier III certificate. Manufacturers must assign engine family names to these paired Tier II/Tier III families that differ by at least 1 character.