

March 7, 2022

Michael Walker, CEO
STAX Engineering, Inc.
65 Pine Avenue, Suite 943
Long Beach, California 90802
m.walker@staxengineering.com

Dear Michael Walker:

The California Air Resources Board (CARB) staff reviewed STAX Engineering's (STAX) Test Plan (Test Plan) for the mobile water-based Xcap™ and STAXbox™ capture and control system to treat emissions from tanker auxiliary engines and boilers for use as a CARB Approved Emissions Control Systems (CAECS).

On November 23, 2021, STAX submitted a Test Plan to obtain approval for the barge-based Xcap and STAXbox to be used as a CAECS for compliance with the 2020 Control Measure for Ocean-Going Vessels At Berth (2020 At Berth Regulation). CARB staff reviewed the Test Plan and submitted comments to STAX staff on December 3, 2021, December 31, 2021, January 24, 2022, and February 18, 2022. To address staff's comments, STAX staff revised the Test Plan on December 22, 2021, January 8, 2022, January 30, 2022, and again on February 21, 2022.

Based on CARB staff's review, and pursuant to section 93130.5(f) of the 2020 At Berth Regulation, STAX's Test Plan (Dated February 21, 2022, attached) is hereby approved in accordance with testing requirements under 2020 At Berth Regulation and CARB's Recommended Emissions Testing Guidelines for Ocean-Going Vessels. In order to obtain CARB's Executive Officer's approval of STAX's emissions control strategy application, STAX will need to complete all testing outlined in their Test Plan submitted on February 21, 2022, and provide all reports generated from these tests along with an application for an Executive Order. The application requirements that STAX must meet to submit test results are outlined in section 93130.5 of CARB's 2020 At Berth Regulation.

Vessel visits that coincide with these tests may count as a compliant visit under the 2017 Advisory Scenario 5 or the research exceptions in section 93130.8 (d) or 93130.10 (e) of the 2020 At Berth Regulation; however, these sections only apply for testing identified in the Test Plan and conducted after March 7, 2022, when the Test Plan was approved.

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If you have any questions, please contact Angela Csondes, Manager, Marine Strategies Section, at angela.csondes@arb.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Heather Arias". The signature is fluid and cursive, with the first name "Heather" written in a larger, more prominent script than the last name "Arias".

Heather Arias, Chief, Transportation and Toxics Division

Enclosure: STAX CARB Test Plan.tanker.005 with appendices.pdf

cc: Angela Csondes, Section Manager, Marine Strategies Section