



August 4, 2022

Clay Sandidge, CEO AERAS Technologies, LLC 192 North Marina Drive Long Beach, California 90803 clay@aeras-technologies.com

Dear Clay Sandidge:

The California Air Resources Board (CARB) staff reviewed AERAS Technologies (AERAS) AERAS-1 System's Test Plan (Test Plan) for the barge-based emissions control strategy to treat emissions from container ship auxiliary engines.

On March 9, 2022, AERAS submitted a draft Test Plan to gain approval for the barge-based AERAS-1 System to be used for compliance with the 2020 Control Measure for Ocean-Going Vessels At Berth (2020 At Berth Regulation or Regulation). CARB staff reviewed the Test Plan and submitted comments to AERAS on April 18, 2022, May 13, 2022, June 27, 2022, and July 5, 2022. To address CARB staff's comments, AERAS revised the Test Plan on June 8, 2022, June 28, 2022, and again on July 14, 2022.

Based on CARB staff's review, and pursuant to section 93130.5(f) of the 2020 At Berth Regulation, AERAS' Test Plan is hereby approved in accordance with testing requirements under CARB's 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 AERAS' emissions control strategy application, AERAS will need to complete all testing outlined in their Test Plan submitted on July 14, 2022, and submit all reports generated from these tests along with an application for an Executive Order. The application requirements that AERAS must meet to submit test results are outlined in section 93130.5 of the 2020 At Berth Regulation.

Vessel visits that coincide with these tests may count as a compliant visit under the 2017 Advisory Scenario 5 for visits on or before December 31, 2022, or the research exceptions in section 93130.8 (d) or 93130.10 (e) of the Regulation for visits on or after January 1, 2023; however, these sections only apply for testing identified in the Test Plan and conducted after August 4 2022, when the Test Plan was approved. To complete all the testing outlined in the Test Plan, a maximum of 12 vessel visits can utilize the 2017 Advisory Scenario 5 or the research exceptions in section 93130.8 (d) or 93130.10 (e) of the Regulation. If more than twelve vessel visits are needed to complete all the testing outlined in the approved Test Plan, AERAS can seek additional approval from CARB.

Clay Sandidge, CEO August 4, 2022 Page 2

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

Sincerely,

Heather Arias, Chief, Transportation and Toxics Division

cc: Angela Csondes, Section Manager, Marine Strategies Section