

June 12, 2024

Mr. Nick Tonsich  
Clean Air Engineering – Maritime, Inc.  
2500 Via Cabrillo Marina, Suite 300  
San Pedro, California 90731  
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Dear Mr. Tonsich:

California Air Resources Board (CARB) staff has reviewed Clean Air Engineering – Maritime, Inc.'s (CAEM) amended Test Plan for the barge-based METS-3 (AB-000-N-CAE-001-0) control system to treat emissions from container and roll-on/roll-off (ro-ro) vessel auxiliary engines.

On October 4, 2022, CAEM submitted "Emission Test Protocol for Barge Based Control System to Treat Emissions from Auxiliary Engines" (Test Plan, Version 1) to be used 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 CAEM on January 1, 2023, July 17, 2023, October 27, 2023, December 8, 2023, January 17, 2024, February 13, 2024, and March 8, 2024. To address staff's comments, CAEM revised the Test Plan on May 19, 2023, September 19, 2023, November 14, 2023, December 22, 2023, January 25, 2024, February 21, 2024, and again on April 4, 2024.

On April 22, 2024, CARB approved CAEM's Test Plan (submitted April 4, 2024) and issued a Test Plan approval letter. On May 10, 2024, CARB requested an amended Test Plan from CAEM to update the Relative Accuracy Test Audit (RATA) tests to be performed at each load point (high, low, and typical). CAEM submitted an amended Test Plan (Version 9) on May 14, 2024.

Based on CARB staff's review, and pursuant to Health and Safety Code section 93130.5(f) of the 2020 At Berth Regulation, CAEM's amended Test Plan, Version 9, is hereby approved in accordance with testing requirements for container and ro-ro vessel auxiliary engines under the CARB 2020 At Berth Regulation. CARB's Test Plan approval letter (dated April 22, 2024) and CAEM's Test Plan (submitted April 4, 2024) are now considered superseded.

CARB approval is based on the system description, design, and operational procedures outlined in CAEM's Test Plan (Version 9). No changes or modifications are permitted to the METS-3 system, including the capture system design and operation, without prior CARB approval.

The application requirements that CAEM must meet to submit test results are outlined in section 93130.5 of the 2020 At Berth Regulation. Per section 93130.5(i) of the 2020 At Berth Regulation, if testing deviates from the approved Test Plan without prior CARB approval,

the Executive Officer may deem the application incomplete or disapprove the application. An example of deviating from the Test Plan includes conducting testing on additional vessel visits beyond those approved in the Test Plan and claiming such visits qualify for the research exception set forth in section 93130.8(d) or 93130.10(e) of the 2020 At Berth Regulation. CARB reserves the right to request the results of any testing conducted beyond the testing described in the approved Test Plan.

Vessel visits that coincide with the tests specified in the approved Test Plan may count as a compliant visit under 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 the date of this letter when the Test Plan is approved. All testing must adhere to the system description, design, and operational procedures outlined in the approved Test Plan. To complete the testing outlined in the Test Plan, a total of eight vessel visits are approved to utilize the research exception to comply with the 2020 At Berth Regulation set forth in section 93130.8(d) or 93130.10(e).

CAEM is responsible for tracking the usage of the eight approved vessel visits that may utilize the research exception, and CAEM must provide a copy of the approved Test Plan to each vessel participating in the research. CAEM is also responsible for communicating with the vessel operator to ensure the operator knows what tests are being performed during the visit, and which number out of the eight approved visits the vessel is participating in. As noted above, any tests completed in excess of those approved in the Test Plan would not be eligible for the research exception to comply with the 2020 At Berth Regulation set forth in section 93130.8(d) or 93130.10(e). If more than eight vessel visits are needed to complete all the testing outlined in the approved Test Plan, CAEM must seek additional approval from CARB.

If you have any questions, please contact Angela Csondes, Manager, Marine Strategies Section, at [angela.csondes@arb.ca.gov](mailto:angela.csondes@arb.ca.gov).

Sincerely,



Bonnie Soriano, Chief, Freight Activity Branch, Transportation and Toxics Division

Attachment: METS Emission Test Protocol (Container and RoRo Vessels) Version 9.pdf

cc: Angela Csondes, Section Manager, Marine Strategies Section