

July 17, 2023

Edward Washburn, SVP Fleet Operations
Pasha Hawaii
4040 Civic Center Drive, Suite 400
San Rafael, California 94903
Edward_Washburn@pashanet.com

Dear Edward Washburn:

The California Air Resources Board (CARB) issued Executive Order (EO) G-22-479 on December 19, 2022, to Clean Air Engineering Maritime (CAEM) for the ShoreKat, a shore-based capture and control system to treat emissions from auxiliary engines on ocean-going bulk vessels. Since the issuance of EO G-22-479 to CAEM, ownership of the system has been transferred from CAEM to Pasha Stevedoring and Terminals (Pasha).

CARB staff approved the ShoreKat system to treat emissions from auxiliary engines on ocean-going bulk vessels in accordance with:

- CARB's Airborne Toxic Control Measure (ATCM) for Auxiliary Diesel Engines Operated on Ocean-Going Vessels At-Berth in a California Port Regulation (2007 At-Berth Regulation);
- The guidelines provided in CARB's "Recommended Emissions Testing Guidelines for Ocean-Going Vessels;" and
- CARB approved ShoreKat Test Plan (approved on June 26, 2018).

EO G-22-479 outlines the approved operating conditions and control efficiencies for the system. The EO also outlines the monitoring, reporting, and recordkeeping requirements for the ShoreKat.

The EO is based on the system's design, configuration, and operation during the source, durability, and capture efficiency testing that took place during the certification process. Since the issuance of the EO, the ShoreKat has been modified and taken out of service by Pasha, and its current configuration does not reflect the system approved in EO G-22-479. Due to the modifications, EO G-22-479 is no longer valid and may not be used.

To acquire an active Executive Order for the ShoreKat, the system must get approved as a CARB Approved Emission Control Strategy (CAECS), as specified in Section 93130.5(d)(3) of the "Control Measure for Ocean-Going Vessels At Berth" (the "CM;" title 17, California Code of Regulations, section 93130) (2020 At Berth Regulation). The first step of the CAECS approval process is submitting a test plan to CARB for conducting the emissions reduction testing, durability testing, and a timeline for testing.

We look forward to working with Pasha to recertify the ShoreKat system as a CAECS for 2020 At Berth Regulation compliance.

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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" being more prominent than the last name "Arias".

Heather Arias, Chief, Transportation and Toxics Division

cc: Angela Csondes, Section Manager, Marine Strategies Section