

August 31, 2023

Steven Arita
Chevron Products Company
A subsidiary of Chevron U.S.A., Inc.
P.O. Box 1272
Richmond, California 94802

Dear Steven Arita:

On December 1, 2021, Chevron Products Company (Chevron) submitted an Innovative Concept Application (Application) as a potential compliance pathway for meeting the requirements of the 2020 Control Measure for Ocean-Going Vessels At Berth (2020 Regulation or Control Measure) pursuant to California Code of Regulations, title 17, section 93130.17.

On July 14, 2022, California Air Resources Board (CARB) staff notified Chevron by letter that the Application was not complete as it did not contain the minimum information required for Innovative Concept applications as described in section 93130.17(b)(1). CARB's letter requested Chevron to resubmit a revised, completed application addressing the missing information by August 19, 2022. CARB received an updated application from Chevron on August 19, 2022.

The application includes the following 14 sub-concepts as potential compliance pathways, 5 of which require California Environmental Quality Act (CEQA) approval (outlined in the table on the next page). CARB staff met with Chevron on at least four occasions to discuss the Innovative Concept application and sub-concepts, including September 21, 2022, May 17, 2023, July 5, 2023, and July 26, 2023.

#	Sub-Concept	Requires CEQA Approval?
1	Reduce locomotive emissions by replacing one or more locomotives with lower emitting locomotives	No
2	Replace five older steam boilers with two new, more efficient, boilers in their refinery	Yes
3	Eliminate diesel air compressors and replace them with an electric equivalent	No
4	Optimize the ammonia slip from Fluidized Catalytic Cracker (FCC) to a level which is much lower than the level allowed under existing air permits	No
5	Replace the Emissions Reduction Device (ERD) with new duplicative vapor recover units (VRU) with activated carbon adsorption technology that will eliminate the need for natural gas combustion while still controlling reactive organic gas.	Yes
6a*	Install a new heat exchanger on three of the heaters at the Taylor Katalytic deNitrification (TKN) plant	No
6b*	Conduct an overall thermal energy study on the plant to reduce overall firing rates of heaters	No
7	Eliminate most of the generators within the North Ranch trailers within the Chevron Refinery by installing electrical energy	No
8	Install solar panels in the northern end of the Richmond Refinery	Yes
9	Install a solar power generation in or near the Richmond Refinery for shore power or instead of using solar panels, procure electricity for shore power usage that is from a source with lower total emissions than electricity from the grid.	Yes
10	Accelerate adoption of vessels with Tier II Auxiliary Engine (AE) or above, prior to CARB At Berth implementation date	No
11	Accelerate the use of Tier III vessels much earlier and well beyond what otherwise would be expected under the "business-as-usual" scenario	No
12	Upgraded Combustion and Control systems for Auxiliary Boilers (AB) for ships	No
13	Proactively seek dual-fuel Tier III Auxiliary Engines (LNG, methanol, ammonia, hydrogen and/or other fuels) for use on vessels at Richmond Long Wharf (RLW) as a deliberate, early-adoption choice	No
14	Shore Power or stack capture for Barges/Tug Boats	Yes

* CARB staff separated sub-concept 6 into two sub-concepts. More information on this decision is available in Attachment A.

On May 26, 2023, CARB received an email from Chevron requesting CARB bifurcate its review of its Application to prioritize the following sub-concepts: 1, 3, 6a, 6b, 7, 10, 11, 12, and 13. These projects are all non-CEQA sub-concepts, additionally they are sub-concepts with the earliest implementation dates. In an effort to assist Chevron in the approval process of their Application, as requested, CARB has started the evaluation of these sub-concepts

from the Application first. The remaining concepts will be evaluated separately, but CARB encourages Chevron to use this letter as guidance in updating remaining concepts as well.

Based on CARB staff evaluation of Chevron's Innovative Concept Application, the Innovative Concept Application is incomplete for sub-concepts 1, 3, 6a, 6b, 7, 10, 11, 12, and 13.

CARB is requesting Chevron resubmit their application with additional information described in this letter and outlined in Attachment A, "Chevron, Richmond Refinery Innovative Concept Evaluation Summary." Section 93130.17 (b)(5) of the 2020 Regulation allows for Chevron to respond within 30 days of the receipt of this letter and provide CARB with additional information to complete the application.

Attachment A outlines the additional information needed to respond to specific elements of the Regulation for the sub-concepts in the Application. As detailed in Attachment A, CARB is requesting additional information for each sub-concept to fulfill the business-as-usual provision in Section 93130.17(a)(6). Additionally, CARB staff requests additional information on the reporting and recordkeeping of each of the sub-concepts in Section 93130.17 (b)(1)(D) and (d)(2).

The business-as-usual provision of the application ensures that the work conducted under the Innovative Concept are in excess of what would occur naturally without the 2020 Regulation. The regulated community needs certainty that the reductions achieved under an Innovative Concept are in excess of what would be achieved without the 2020 Regulation. For example, some of the Innovative Concepts involve replacing equipment that has been in service for decades, and the emissions reductions attributable to the Innovative Concept would be those achieved in excess of the business-as-usual set of conditions. This analysis requires information on useful life of this equipment and when it would be expected to be retired or replaced if it was not part of the Innovative Concept, which was not included in the Application and discussed in our previous meetings.

The reporting and recordkeeping are critical elements of the application where CARB requires additional information. For each sub-concept, please provide the annual reporting methodology, preferably on a spreadsheet, including the information that will be tracked and reported for compliance with the annual reporting required in Section 93130.17 (d)(2) for the listing of emissions reductions that were achieved with the Innovative Concept. Specifically, provide a clear listing of inputs for what information Chevron will be keeping as records and how those records will be used to calculate the reductions achieved by the Innovative Concept for each sub-concept. The methodology described in the application must be clear enough for CARB to understand what annual reporting per Section 93130.17 (d)(2) will entail and what information will be provided, with reductions calculations functionality so CARB can track reductions for compliance.

It is CARB's understanding that some of the projects are underway in anticipation of approval of an Innovative Concept. Ensure to track all pertinent information for these projects so that the emission reductions can be applied as early reductions under the Innovative Concept, if

approved. CARB will consider whether the applicant can claim credit for reductions as early as January 1, 2023, or as appropriate for each approved sub-concept.

Once we receive your response, we can proceed with the evaluation of your Application according to Section 93130.17 (b)(3). We look forward to your response by September 30, 2023. If CARB does not receive a corrected application within 30 days, Section 93130.17(b)(5) of the Regulation provides the Application will be denied.

If you have any additional questions or would like to further discuss the content of this letter and Attachment A, please contact Jonathan Foster, Air Resources Engineer, Marine Strategies Section, at Jonathan.Foster@arb.ca.gov or Angela Csondes, Section Manager, Marine Strategies Section, at Angela.Csondes@arb.ca.gov. If you would like to discuss CARB staff's feedback via conference call or a virtual meeting, we would be happy to accommodate that.

Sincerely,

A handwritten signature in blue ink, appearing to read "Bonnie Soriano".

Bonnie Soriano, Branch Chief, Freight Activity Branch

Attachment - "Attachment A–Chevron Richmond–Innovative Concept Evaluation–Request for More Information"

cc: Jonathan Foster, Air Resources Engineer, Marine Strategies Section

Chevron, Richmond Refinery Innovative Concept Evaluation Summary

The California Air Resources Board’s (CARB) Control Measure for Ocean-Going Vessels At Berth (2020 Regulation or Control Measure) section 93130.17 provides that applications for Innovative Concepts (IC) must contain, at a minimum, the specific information detailed under section 93130.17 (b)(1). CARB bifurcated its review of the application, per Chevron’s request on May 26, 2023, to prioritize reviewing the sub-concepts listed in Table 1. The remaining concepts will be evaluated separately. The application submitted on December 1, 2021, and the updated IC application submitted in August 2022 (Application), did not contain the minimum information identified by the 2020 Regulation. In Table 2 below, CARB Staff has outlined the specific areas required by the 2020 Regulation which are missing or incomplete in your Application for the sub-concepts listed in Table 1.

In general, applications for Innovative Concepts must contain any information necessary to demonstrate that the proposed Innovative Concept will “reduce NOx, PM 2.5, and ROG emissions equivalent to or greater than the level that would have been achieved by the Control Measure, while not increasing GHG,”¹ (See section 93130.17 (a)(2)).

Emissions Equivalency: To establish equivalency, the Application should provide three main components for each of the outlined sub-concepts:

- 1) Baseline Emissions Estimates per section 93130.17 (b)(1)(C): “Estimate of the vessel emissions planned to be covered under the Innovative Concept for each pollutant NOx, PM 2.5, and ROG by multiplying the emission factor for a pollutant found in section 93130.5(d) of this Control Measure by the expected number of vessel visits, average visit duration, and expected power used during an average visit.”
- 2) An estimate of reductions that would be achieved under direct compliance with the regulation, in absence of any Innovative Concept (generally referred to as Direct Compliance Estimates).
- 3) An estimate of reductions achieved by the proposed Innovative Concept (generally referred to as Innovative Concept Estimates).

See Items 2, 13, and 20 in Table 2 below for more details. These estimates must identify any assumptions such as activity, emission factors, energy consumed by the Innovative Concept, and provide estimates for NOx, PM 2.5, and ROG reductions. Please provide an Excel spreadsheet that provides these estimates for each sub-concept.

Table 1: The First Batch of Sub-Concepts Evaluated Herein

Sub-Concept	Requires CEQA?	Chevron Priority	Concept
1	No	1	Reduce locomotive emissions by replacing one or more locomotives with lower emitting locomotives.
3	No	4	Eliminate diesel air compressors and replace them with an electric equivalent.
6a*	No	2	Install a new heat exchanger on three of the heaters at the Taylor Katalytic deNitrification (TKN) plant.
6b*	No	2	Conduct an overall thermal energy study on the plant to reduce overall firing rates of heaters.
7	No	7	Eliminate most of the generators within the North Ranch trailers within the Chevron Refinery by installing electrical energy.
10	No	3	Accelerate adoption of vessels with Tier II Auxiliary Engines (AE) or above, prior to CARB At-Berth implementation date.
11	No	5	Accelerate the use of Tier III vessels much earlier and well beyond what otherwise would be expected under the “business-as-usual” scenario.
12	No	6	Upgraded Combustion and Control systems for Auxiliary Boilers (AB) for ships
13	No	8	Proactively seek dual-fuel Tier III Auxiliary Engines (LNG, methanol, ammonia, hydrogen and/or other fuels) for use on vessels at RLW as a deliberate, early-adoption choice.

*Sub-concept 6 was separated into two separate sub-concepts by CARB staff when reviewing the application. The new heat exchanger technology (“finned tubes”) to be installed on three heaters at the Taylor Katalytic deNitrification (TKN) plant is a very specific and well-documented Innovative Concept sub-concept. However, the description of the proposal for sub-concept 6 also proposes that in addition to the three heater upgrades, “an overall thermal energy study on the plant to reduce overall firing rates of heaters” will be conducted. This undertaking appears to constitute a separate project with unique requirements, schedules, equipment, and potentially regulatory controls that may be quite different than the upgrades on the three heaters mentioned already. CARB staff believes that this undertaking would warrant its own qualification as a sub-concept. However, this proposal has not been addressed in any of the submittals or communications that CARB has received. Because it was mentioned in the original application, Chevron can still address this as a separate Innovative Concept sub-concept. However, each of the requirements for Innovative Concepts would need to be met.

¹ NOx is oxides of nitrogen, PM2.5 are fine particulate matter that are 2.5 microns or less in diameter, ROG is reactive organic gas, GHG is greenhouse gas.

Attachment A

Table 2: Outline of Information Missing from Application

Item #	Applicable section of 93130.17	<p align="center">Requirement Summary (See 2020 Control Measure section 93130.17 for the complete text and requirement.) Please include the following in your updated application.</p>	Category	Sub-concept #	<p align="center">Missing Information Please provide in updated Application</p>
1	(a)(1)	<p>Submittal of the application by the December 1, 2021 deadline.</p>	Timeframe	All	Application meets requirement.
2	(a)(2)	<p>The application should demonstrate how the Innovative Concept will “...reduce NOx, PM 2.5, and ROG emissions equivalent or greater than the level that would have been achieved by the Control Measure, while not increasing GHG...”</p> <p>Item 19 (93130.17 (b)(1)(C)) requires the quantity of planned estimated emissions reductions. This requirement is to explain <i>how</i> that will be achieved.</p>	Emissions Reduction Estimates, Calculations, and Explanations	1, 3, 6a, 7 10, 11, 12, 13	Provide a clear listing of inputs for what information Chevron will be keeping as records and how those records will be used to calculate the reductions achieved by the Innovative Concept for each sub-concept. The methodology described in the application must be clear enough for CARB to understand what annual reporting per Section 93130.17 (d)(2) will entail and what information will be provided, with reductions calculations functionality so CARB can track reductions for compliance.
3	(a)(3)	<p>The application must demonstrate how the Innovative Concept emissions reductions will be “...early or in excess of any other [government or legal requirement].”</p>	IC Can't be Business as Usual or Otherwise Required	1, 3, 6a, 7 10, 11, 13	Application meets requirement.
				12	Please provide more details showing that this is “an uncommon vessel technological upgrade that is not mandated by any maritime regulation.” Are other ports, domestic or foreign, requiring this type of emissions reductions activity that Chevron would be required to comply with in the absence of the Innovative Concept provision of the Control Measure.
4	(a)(4)	<p>The application must demonstrate how the Innovative Concept emissions reductions will be “...in and around the California port or marine terminal at which the vessel visits take place for which the innovative concept is used. The reductions must be at the same port or marine terminal, within adjacent communities, or overwater within three nautical miles of the port or marine terminal.”</p>	Location of IC	1, 3, 6a, 7	Application meets requirement.
				9a, 9b	Sub-concepts do not meet this requirement.
				10, 11, 12, 13	Please confirm that this concept is only accounting for activity at berth. If activity includes transiting within three nautical miles, then it needs to be clearly described how this will be tracked.

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Item #	Applicable section of 93130.17	Requirement Summary (See 2020 Control Measure section 93130.17 for the complete text and requirement.) Please include the following in your updated application.	Category	Sub-concept #	Missing Information Please provide in updated Application
5	(a)(5)	The application must demonstrate how the Innovative Concept will <i>“not increase emissions at other ports or marine terminals.”</i> (An adequate response to Item 18b [(b)(1)(B)] satisfies this requirement.)	Description of IC	1, 10, 11, 12, 13	Application meets requirement.
				3, 6a, 7	Please demonstrate that emissions reductions due to the sub-concepts don't increase emissions elsewhere. In other words, if the sub-concept has a reduced output for that operation, does production increase elsewhere (using fossil fuel combustion) to compensate for any reduced power production due to the sub-concept. For example, is there a total facility operational limit?
6a	(a)(6)	The application must demonstrate that the Innovative Concept is not an activity or technology implementation that is <i>“...reasonably expected to occur within the relevant area in the absence of the incentive provided by the Innovative Concept provisions of this Control Measure, taking into account all current laws and regulations, as well as current economic and technological trends.”</i>	IC Can't be Business as Usual (BAU) or Otherwise Required	All	The business-as-usual provision of the application ensures that the work conducted under the Innovative Concept are in excess of what would occur naturally without the 2020 Regulation. The regulated community needs certainty that the reductions achieved under an Innovative Concept are in excess of what would be achieved without the 2020 Regulation. For equipment upgrades or replacements, this analysis requires information on useful life of this equipment and when it would be expected to be retired or replaced if it was not part of the Innovative Concept.
				1	Please demonstrate that any contracts for acquiring, purchasing, or leasing this locomotive and any other locomotives to be used for the Innovative Concept were entered into after the Innovative Concept portion of the Control Measure was made public. Otherwise, please provide any information that shows that this/these locomotive(s) was/were not already part of existing business or upgrade plans.
				3	Please demonstrate that the diesel air compressors have not reached their end of life and were not scheduled for replacement in the absence of the incentive provided by the Innovative Concept provision of the Control Measure.
				6a	Please demonstrate that the three process heaters have not reached their end of life and were not scheduled for

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					replacement in the absence of the incentive provided by the Innovative Concept provision of the Control Measure.
				7	Please demonstrate that the current generators have not reached their end of life and were not scheduled for replacement in the absence of the incentive provided by the Innovative Concept provision of the Control Measure.
				10	Please demonstrate that these upgrades to Tier II auxiliary engines were not already plan of record as part of aging fleet turnover plans and/or economic improvement (newer auxiliary engines may reduce repair and maintenance costs). Additionally, an increased amount of Tier II vessels will come to California as vessels turnover. Please include any assumptions or methodology for creating the baseline and for determining whether a vessel exceeds the baseline to determine whether a vessel's visit is part of this sub-concept.
				11	Please demonstrate that these upgrades to Tier III auxiliary engines were not already plan of record as part of aging fleet turnover plans and/or economic improvement (newer auxiliary engines may reduce repair and maintenance costs). Additionally, an increased amount of Tier III vessels will come to California as vessels turnover. Please include any assumptions or methodology for creating the baseline and for determining whether a vessel exceeds the baseline to determine whether a vessel's visit is part of this sub-concept.
				12	See also Item 3.
				13	Please demonstrate that vessel replacements and upgrades are not already plan of record as part of aging fleet turnover plans and/or economic improvement (e.g., newer vessels or newer engines may reduce repair and maintenance costs to meet corporate revenue targets). Please demonstrate that this effort to securing newbuild dual fuel vessels and retrofitting existing vessels with new dual-fuel compatible systems is "accelerated" and "earlier" than would otherwise be planned or economically necessitated. Additionally,

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					some amount of dual fuel/alternative fuel vessels come to California as vessels turnover. Please include any assumptions or methodology for creating the baseline and for determining whether a vessel exceeds the baseline to determine whether a vessel's visit is part of this sub-concept.
6b	(a)(6)	<p>The application must demonstrate that the Innovative Concept emission reductions <i>"are real, quantifiable, verifiable, and enforceable."</i></p> <p>(An adequate response to Item 19 [(b)(1)(C)] satisfies this requirement.)</p>	Description of IC	1, 3, 6a, 7 10, 11, 12, 13	Application meets requirement. The application identifies how the manufacturer's classification will be the basis for establishing emissions for the various engine types. This demonstrates how the emissions reductions are "real" and "quantifiable." Please provide more details surrounding how the emission reductions will be "verifiable" and "enforceable" (Sub-concept 13 demonstrates "verifiable"). The application states, "Testing of AE or AB stack emissions will not be carried out by RLW as this is a part of the procedure that Classification Society's use to periodically endorse AE and AB operations in alignment with "Technical File" requirements." Please describe this process and how this will be tied to each vessel and tracked. This item complementary to item 20 (93130.17 (b)(1)(D)) in that the recordkeeping, reporting, monitoring, and testing procedures help show that the emissions reductions are "verifiable" and "enforceable."
7	(a)(7)	<p>Please acknowledge an understanding that: <i>No innovative concept shall have a compliance period greater than five years...</i>"(See full text for applicable details).</p> <p>(An adequate response to Item 22 [(b)(1)(F)] satisfies this requirement.)</p>	Timeframe	1, 3, 6a, 7 10, 11, 12, 13	Application meets requirement.

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8	(a)(8)	Please acknowledge an agreement that: The Innovative Concept cannot be extended for another compliance period if <i>"...the Executive Officer concludes that any of the circumstances listed in subsection 93130.17(f)(1) of this Control Measure are present; or the applicant elects to cancel an approved innovative concept..."</i> (See full Control Measure text for all applicable details).	Timeframe	1, 3, 6a, 7 10, 11, 12, 13	Application meets requirement.
9	(a)(9)	Please acknowledge an understanding that: <i>"Visits made under an innovative concept are not counted toward a fleet's VIEs or terminal operator's TIEs in section 93130.11 of this Control Measure, and are ineligible for using the remediation fund provisions in section 93130.15 of this Control Measure."</i>	General provisions	1, 3, 6a, 7 10, 11, 12, 13	Application meets requirement.
10	(a)(10)	Please acknowledge an understanding that: <i>"Reductions can be used toward compliance as specified in this section only in the calendar year in which they are achieved or the following calendar year."</i>	Timeframe	1, 3, 6a, 7 10, 11, 12, 13	Application meets requirement.
11	(a)(11)	Please acknowledge an understanding that: <i>"Early reductions achieved through an innovative concept that occur before a vessel or terminal's first compliance period can be used towards compliance during the first compliance period of up to five years. However, early reductions are only applicable for the initial compliance period, and will expire when the initial compliance period ends."</i>	Timeframe	1, 3, 6a, 7 10, 11, 12, 13	Application meets requirement.
12	(a)(12)	Show or acknowledge that: <i>"...the innovative concept is not to be partially or fully funded with a public incentive program."</i>	Recordkeeping	1, 3, 6a, 7 10, 11, 12, 13	Application meets requirement.
13a	(a)(13)	Demonstrate your plan to maintain records that show that: <i>"...information on fuel usage, routes, port calls, maintenance procedures, and emissions test results."</i>	Recordkeeping	All	This requirement was not specifically addressed in the Application. Some items of information required by 13a do not apply to some sub-concepts (e.g., sub-concept 7 clearly doesn't require a record of port calls). Some descriptions of

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					the sub-concepts in the Application give details surrounding how fuel usage will be used to determine emissions. It has also been noted in the Application for some sub-concepts that Chevron will not be conducting stack testing (e.g., sub-concepts 10, 11, 12, and 13). Please provide details for the items listed here (fuel usage, routes, etc.) for sub-concepts for which the requirement applies that do not already contain the requested information.
13b	(a)(13)	Please acknowledge an understanding that: <i>“Such records and reports shall be retained for a period of not less than five years and shall be submitted to the Executive Officer in the manner specified in the approved innovative concept and upon request by the Executive Officer, either within 10 calendar days or by a later date approved by the Executive Officer on a case-by-case basis.”</i>	Recordkeeping	All	Please acknowledge an understanding of this requirement.
14	(a)(14)	Please acknowledge an agreement that: <i>“No person shall operate under an innovative concept unless the applicant has first been notified in writing by the Executive Officer that the innovative concept application has been approved. Prior to such approval, vessel operators and terminal operators intending to use the innovative concept shall comply with the provisions of this section, including the emission limits in sections 93130.7 and 93130.9 of this Control Measure.”</i>	General provisions	All	Application meets requirement.
15	(a)(15)	Explain your implementation plan, showing that: <i>“The innovative concept will be implemented within the timeframe needed to be used for compliance with this Control Measure, including any time needed for environmental review (if applicable).”</i> Also see Item 24 (93130.17 (b)(1)(H)) and 93130.17 (b)(3)(E).	<ul style="list-style-type: none"> • Timeframe • Governmental and Environmental Approvals 	1, 3, 6a, 7 10, 11, 12, 13	Application meets requirement.
16	(a)(16)	Please acknowledge agreement that: <i>“No person shall comply with this section by operating under an</i>	General provisions	All	N/A

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Item #	Applicable section of 93130.17	<p align="center">Requirement Summary (See 2020 Control Measure section 93130.17 for the complete text and requirement.) Please include the following in your updated application.</p>	Category	Sub-concept #	<p align="center">Missing Information Please provide in updated Application</p>
		<i>innovative concept that has been revoked as provided in section 93130.17(f) of this Control Measure.</i>			
17	(b)(1)(A)	<i>"Company name, address, and contact information."</i>	Applicant information	All	Application meets requirement.
18a	(b)(1)(B)	<i>"A description of the proposed Innovative Concept(s) including source and scope of emission reductions."</i>	Description of IC	1, 3, 6a, 7 10, 11, 12, 13	Application meets requirement.
18b	(b)(1)(B)	<i>"A description of proposal including a project site plan and a location map."</i>	Location of IC	1, 3, 6a, 7 10, 11, 12, 13	Application meets requirement.
19	(b)(1)(C)	<p>An estimate of the planned vessel emissions reductions of NOx, PM 2.5, and ROG due to the Innovative Concept. To estimate these reductions, "...[multiply] the emission factor for a pollutant found in section 93130.5(d) of this Control Measure by the expected number of vessel visits, average visit duration, and expected power used during an average visit."</p> <p>Item 2 (93130.17 (a)(2)) requires an explanation of how emissions reductions will be achieved. This requirement is to provide an estimate of the planned estimated emissions reductions.</p>	Emissions Reduction Estimates, Calculations, and Explanations	1, 3, 6a, 7 10, 11, 12, 13	Application meets requirement.
20	(b)(1)(D)	<i>"The proposed recordkeeping, reporting, monitoring, and testing procedures that will be used to demonstrate reductions."</i>	Recordkeeping	All	Include the proposed annual report as it will be submitted to CARB, including all the information that will be tracked and reported for all sources and include all assumptions and metrics that will be included to calculate reductions, as required in the annual report, in Section 93130.17 (d)(2). A spreadsheet should be provided for each sub-category that reflects the information that will be reported to CARB annually.
				10, 11, 12, 13	The application identifies how the manufacturer's classification will be the basis for establishing emissions for the various engine types. The application states, "Testing of AE or AB stack emissions will not be carried out by RLW as this is a part of the procedure that Classification Society's

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					use to periodically endorse AE and AB operations in alignment with "Technical File" requirements." Please describe this process and how this will be tied to each vessel and tracked. This item complementary to item 6b (93130.17 (a)(6)) in that the recordkeeping, reporting, monitoring, and testing procedures help show that the emissions reductions are "verifiable" and "enforceable."
21	(b)(1)(E)	Any MOUs or similar agreements between the applicant and any partners. (See full Control Measure text for all applicable details).	Funding	1, 3, 6a, 7 10, 11, 12, 13	Application meets requirement.
22	(b)(1)(F)	<i>"The proposed length of time during which the innovative concept would be used...as well as the number and duration of any anticipated time extension requests..."</i>	Timeframe	1, 3, 6a, 7 10, 11, 12, 13	Application meets requirement.
23	(b)(1)(G)	<i>"A summary of all governmental approvals necessary to enable development of the innovative concept."</i>	Governmental and Environmental Approvals	1, 3, 6a, 7 10, 11, 12, 13	Application meets requirement.
24	(b)(1)(H)	<ul style="list-style-type: none"> <i>"A discussion regarding any environmental review requirements that may apply to the proposed innovative concept..."</i> <i>"Identification of which agency would serve as the lead agency for environmental review purposes..."</i> 	Governmental and Environmental Approvals	1, 3, 7 10, 11, 12, 13	A discussion would include a review of which requirements "may" apply to the proposed Innovative Concept, which entities were considered, and why were they ruled out.
				6a	Application meets requirement.
25	(b)(1)(I)	Provide <i>"Any information necessary to demonstrate that the proposed innovative concept meets all [the following] eligibility and applicability requirements in subsection 93130.17(a)" as shown above in Items 1 through 16.</i>	See Items 1 through 16		See Items 1 through 16