

February 12, 2024

Nicholas Tonsich, President  
Clean Air Engineering - Maritime, Inc.  
2500 Via Cabrillo Marina  
San Pedro, California, 90731  
[ntonsich@caemaritime.com](mailto:ntonsich@caemaritime.com)

Dear Nicholas Tonsich:

On December 1, 2021, Clean Air Engineering Maritime (CAEM) submitted an application (Application) for Innovative Concepts as potential compliance pathways 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 CAEM 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 CAEM to resubmit a revised, completed Application addressing the missing information by August 19, 2022. We acknowledge receipt of CAEM's response to this request for more information.

The Application includes the following eight sub-concepts as potential compliance pathways:

#	Sub-Concept
2.1	Using capture and control technology for pre-compliance emissions reduction of tankers in Southern California.
2.2	Using capture and control technology for pre-compliance emissions reduction of tankers at all ports other than Long Beach and Los Angeles.
2.3	Using capture and control technology for pre-compliance emissions reduction of roll-on-roll-off (ro-ro) vessels at all California ports.
2.4	Using capture and control technology for bulk liquid barges at all California ports.
2.5	Using capture and control technology for bulk and general cargo vessels.
2.6	Using capture and control technology for container ships at-anchor.
2.7	Minimizing capture and control connect and disconnect times.

2.8	Exceeding emissions reduction requirements as specified in the Control Measure using capture and control technology.
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Based on CARB staff's evaluation of CAEM's Innovative Concept Application, the Application is incomplete for sub-concepts 2.1 through 2.6 and ineligible for consideration for sub-concepts 2.7 and 2.8.

**Innovative Concept Proposals Sub-concepts 2.7 and 2.8:**

The sub-concepts identified in your application as 2.7 and 2.8 do not meet the requirements as described in section 93130.17(a)(6) and are considered "business-as-usual." The emission reductions outlined in concepts 2.7 and 2.8 propose minimizing emissions control connect and disconnect times and using capture and control systems to exceed the requirements for emission reductions under the 2020 Regulation, which result in a compliant vessel visit using a CARB Approved Emission Control Strategy (CAECS). There are time requirements and emission requirements associated with the minimum qualifications for using a CAECS for compliance. Exceeding the minimum requirements of the 2020 Regulation ensures the visit is compliant, and excess reductions cannot be applied to an Innovative Concept. Therefore, CARB cannot approve CAEM's application for sub-concepts 2.7 and 2.8 as Innovative Concepts.

**Innovative Concept Proposals for Sub-concepts 2.1-2.6:**

The Control Measure provides that applications for Innovative Concepts must contain, at a minimum, the specific information detailed under section 93130.17(b)(1). Neither the application submitted on December 1, 2021, by CAEM nor the revised Application dated August 19, 2022, contained complete information required by the 2020 Regulation for sub-concepts 2.1 through 2.6 and are therefore incomplete.

Overall, the deficiencies mainly relate to incomplete emissions reduction estimates, lack of annual reporting methodology, lack of clarity on extension requests, and an insufficient demonstration that the proposed sub-concepts exceed the business-as-usual-- provision of the Regulation. CARB staff have outlined these deficiencies in more detail in the attachment called "Attachment A - CAEM Innovative Concept Evaluation Request for More Information."

Reporting and recordkeeping are critical elements of the application where CARB requires additional information. In Section 9.5 of your Application, CAEM stated that "Data reporting to CARB will occur on an annual basis consistent with the requirements of the Control Measure, Section 93130.17(d), unless a different reporting frequency is specified in the Executive Order issued as approval of this application. The entirety of the Emission Reduction Credit Database and summaries of the data contained in the database will be provided electronically." However, CARB additionally requests the annual reporting methodology for all sub-concepts, preferably on spreadsheets, 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 CAEM 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.

### **Public Comment Response:**

The 2020 Regulation (Section 93130.17 (b)(2)) requires that applicants submit to CARB responses to public comments within 45 days following a 45-day public comment period for Innovative Concept Applications. Public comments regarding CAEM's Innovative Concept application were provided by Randall Pasek from STAX Engineering and Teresa Bui at Pacific Environment. CARB did not receive CAEM's responses to address those public comments within 45 days following the public comment period (August 19, 2022) and followed-up with CAEM. CAEM responded to CARB and provided a letter dated September 20, 2023, indicating that CAEM's responses to public comments were in their August 19, 2022, updated IC application. The comment from STAX was in support of CAEM's Application and did not warrant a response. However, despite an updated Application that was submitted to CARB on August 19, 2022, CAEM's response did not sufficiently address Pacific Environment's comments, and CARB requests that CAEM provide additional response and explanation.

Pacific Environment expressed concern that CAEM's proposed strategy could hinder shore power or zero-emission technology adoption due to reliance on emission credits. Specifically, the letter stated in paragraph five:

Our concern with this proposal is that this could delay the implementation of shorepower for both the regulated and unregulated ships - **using shorepower is the most efficient way to reduce emissions from ships at berth**. Regulated ships will not use shorepower or zero-emission technologies (e.g., batteries) because they'll use credits generated from unregulated ships, and unregulated ships will only generate credits if they don't already use shorepower or other zero-emission technologies. [Emphasis in original]

In CAEM's letter dated on September 20, 2023, CAEM contended that Pacific Environment's letter, "provides a statement of opinion with no cited factual support (using shorepower is the most efficient way to reduce emissions from ships at berth). The unsupported opinion has no bearing on the decision protocol delineated in CARB's IC regulation that would impact whether the CAEM IC application should be approved or denied, and really has nothing to do with the CAEM IC application." CARB evaluates each innovative concept to ensure applicants respond fully to public comment (Section 93130.317(b)(1)(D)7), and CAEM's response failed to provide an explanation or evidence countering the concern

raised about potential delays in shore power or zero-emission technology adoption.<sup>1</sup> Consequently, CARB is requesting further explanation from CAEM to adequately address Pacific Environment's concerns regarding the potential hindrance to shore power or zero-emission technology adoption stemming from their proposed concept. CAEM's response must address these concerns along with the deficiencies outlined in this letter and Attachment A.

Per section 93130.17 (b)(5) of the 2020 Regulation, please respond within 30 days of this letter and provide us with the information that we have outlined above and in the attachment "Attachment A-CAEM-Innovative Concept Evaluation-Request for More Information." 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 March 13, 2024. 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 Angela Csondes, Section Manager, Marine Strategies Section, at [Angela.Csondes@arb.ca.gov](mailto: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,



Bonnie Soriano, Branch Chief, Freight Activity Branch

Attachment - "Attachment A - CAEM Innovative Concept Evaluation Request for More Information"

cc: Elizabeth Melgoza, Air Pollution Specialist, Marine Strategies Section

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<sup>1</sup> CARB would also note the 2020 Regulation does not condition an applicant's obligation to respond to a public commenter on whether or not the comment provides supporting authority.

# Attachment A - CAEM Innovative Concept Evaluation Request for More Information

The California Air Resources Board (CARB)'s 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. Your revised application submitted on August 19, 2022 (Application), did not contain the minimum information identified by the 2020 Regulation. In Table 3 below, CARB Staff has outlined the specific areas required by the 2020 Regulation which are missing or incomplete in the 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 NO<sub>x</sub>, 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,"<sup>1</sup> (See section 93130.17 (a)(2)). 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 NO<sub>x</sub>, 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 and 19 in Table 3 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 NO<sub>x</sub>, PM 2.5, and ROG reductions. Please provide an Excel spreadsheet that provides these estimates for each sub-concept.

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<sup>1</sup>NO<sub>x</sub> 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.

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**Table 1: CAEM Sub-Concepts**

#	Concept
2.1	Using capture and control technology for pre-compliance emissions reduction of tankers in Southern California.
2.2	Using capture and control technology for pre-compliance emissions reduction of tankers at all ports other than Long Beach and Los Angeles.
2.3	Using capture and control technology for pre-compliance emissions reduction of roll-on-roll-off (ro-ro) vessels at all California ports.
2.4	Using capture and control technology for bulk liquid barges at all California ports.
2.5	Using capture and control technology for bulk and general cargo vessels.
2.6	Using capture and control technology for container ships at-anchor.
2.7	Minimizing capture and control connect and disconnect times.
2.8	Exceeding emissions reduction requirements as specified in the Control Measure using capture and control technology.

**Table 2: CARB Response to Additional Proposals**

CAEM Proposal	CARB Response
CAEM Application, Sections 8 and 9: (Emission Reduction Credits Trading) and Section 10: (Emission Reduction Credit - Administration) and Section 11 (Program Auditing and Quality Control)	CARB staff will neither approve nor disapprove CAEM's business strategies regarding buying, selling, and/or trading emissions credits. If the concepts that are part of the Application (2.1 through 2.6) are approved, a fleet, terminal, or port may enter into an agreement with CAEM to use these sub-concepts for compliance with the Regulation in any way they see fit so long as all provisions indicated in 93130.17 (a) are met.
CAEM Application, Sections 11: Program Auditing and Quality Control	CARB will only manage the compliance of Innovative Concepts according to the Applicant's proposal for recordkeeping as outlined in their Application for compliance to Sections 93130.17 (b)(1)(D) and (b)(3)(C), and the requirements outlined in Sections 93130.17 (c) and 93130.17 (d).

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**Table 3: Outline of Information Missing from Application**

Item #	Applicable section of 93130.17	<b>Requirement Summary</b> See 2020 Control Measure section 93130.17 for the complete text and requirement. Ensure that all requirements are met in the updated application.	Category	Sub-Concept #	Missing Information	Please provide the following information
	<b>93130.17 (a)</b>	<i>“General requirements for using an innovative concept compliance option.”</i>	N/A	N/A	N/A	N/A
1	(1)	<b>Submittal of the application by the December 1, 2021 deadline.</b>	Timeframe	All	Application meets this requirement.	N/A

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2	(2)	<p><b>The application should demonstrate how the Innovative Concept will</b>  <i>"...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..."</i></p>	Emissions Reduction Estimates and Calculations	2.1-2.6	<p>This requirement is asking how CAEM will estimate reductions achieved under the innovative concepts and reductions achieved under direct compliance. The Application provides basic information on the concept, but more details are required to demonstrate how each concept will achieve equivalency and can be carried out.</p>	<p>Estimated vessel emissions for all proposed concepts following criteria to establish equivalency. The table in Section 1.3 of the August 19, 2022, application shows emissions reductions for different vessel types at major California ports but doesn't provide total emissions estimates for each proposal. Refer to page 1 of this attachment, which outlines the three essential components needed to establish equivalency.</p> <p>The table in Section 1.3 of your application indicates a reduction of 90%. Please explain how the 90% emissions reduction estimation was derived and include references for where any input data comes from for these estimates (if different than those in Section 93130.5(d) of the Regulation).</p> <p>Please provide the annual reporting methodology for each concept, preferably on a spreadsheet, including the information that will be reported for compliance with the annual reporting 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 CAEM will be keeping as records and how those records will be used to calculate the reductions achieved by the Innovative Concept. Please provide reductions calculations with functionality so CARB can track reductions for compliance.</p>
				2.7-2.8	See Item 6a	N/A



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3	(3)	<p><b>The application must demonstrate how the Innovative Concept emissions reductions will be “...early or in excess of any other [government or legal requirement].”</b></p>	IC Can't be Business as Usual or Otherwise Required	2.1-2.6	<p>A demonstration that the IC will achieve early or excess reductions from any other state, federal or international rule, regulation, statute, or any other legal requirement, including an MOU<sup>2</sup> or a CARB approved mission reduction strategy in an AB 617 Community Emissions Reduction Program.</p>	<p>Please demonstrate that the average emission reduction rates of using the control strategy are early or in excess of those outlined in Section 93130.5(d). Please also indicate any state, federal, or international rules, regulations, or statutes (if any) including an emission reduction strategy identified in an AB 617 Community Emissions Reduction Program that has been approved by CARB’s Governing Board, and how each concept is early or in excess of that rule, regulation, or statute.</p> <p>Please show due diligence by indicating which state, federal or international rule, regulation, statute, or any other legal requirement have been considered in this analysis, even if it has been determined that they do not apply.</p>
				2.7-2.8	See Item 6a.	N/A

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<sup>2</sup>Memorandum of Understanding

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Item #	Applicable section of 93130.17	<b>Requirement Summary</b> <b>See 2020 Control Measure section 93130.17 for the complete text and requirement.</b> <b>Ensure that all requirements are met in the updated application.</b>	Category	Sub-Concept #	Missing Information	Please provide the following information
4	(4)	<b>The application must demonstrate how the Innovative Concept emissions reductions will be</b> <i>"...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."</i>	Location of IC	All	Application meets this requirement.	N/A
5	(5)	<b>The application must demonstrate how the Innovative Concept will</b> <i>"not increase emissions at other ports or marine terminals."</i>	Description of IC	2.1-2.6	Application meets this requirement.	N/A
				2.7-2.8	See Item 6a.	N/A
6a	(6)	<b>The application must demonstrate that the Innovative Concept is not an</b>	IC Can't be Business as Usual or	2.1-2.6	Application meets this requirement.	N/A



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6b	(6)	<b>The application must demonstrate that the Innovative Concept emission reductions</b> <i>"are real, quantifiable, verifiable, and enforceable."</i>	Description of IC	2.1-2.6	Application meets requirement.	N/A
				2.7-2.8	See Item 6a.	N/A
7	(7)	<b>Please acknowledge an understanding that:</b> <i>No innovative concept shall have a compliance period greater than five years...</i> <b>(See full text for applicable details). (An adequate response to Item 22 [(b)(1)(F)] satisfies this requirement.)</b>	Timeframe	2.1-2.6	Extension requests for concepts.	An extension wouldn't be available for sub-concepts 2.1, 2.2, and 2.3 as early compliance ends after mandatory compliance begins in 2025, or 2027. Please indicate whether an extension may be requested for the other sub-concepts.
				2.7-2.8	See Item 6a.	N/A
8	(8)	<b>Please acknowledge an agreement that: The Innovative Concept cannot be</b>	Timeframe	2.1-2.6	Application meets this requirement.	N/A

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Item #	Applicable section of 93130.17	<b>Requirement Summary</b> <b>See 2020 Control Measure section 93130.17 for the complete text and requirement. Ensure that all requirements are met in the updated application.</b>	Category	Sub-Concept #	Missing Information	Please provide the following information
		<b>extended for another compliance period if</b> <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> <b>(See full Control Measure text for all applicable details).</b>		2.7-2.8	See Item 6a.	N/A
9	(9)	<b>Please acknowledge an understanding that:</b> <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	2.1-2.6	Application meets this requirement.	N/A
				2.7-2.8	See Item 6a.	N/A

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10	(10)	<b>Please acknowledge an understanding that:</b> <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	2.1-2.6	Application meets this requirement.	N/A
				2.7-2.8	See Item 6a.	N/A
11	(11)	<b>Please acknowledge an understanding that:</b> <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	2.1-2.6	Application meets this requirement.	N/A
				2.7-2.8	See Item 6a.	N/A

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Item #	Applicable section of 93130.17	<b>Requirement Summary</b> <b>See 2020 Control Measure section 93130.17 for the complete text and requirement.</b> <b>Ensure that all requirements are met in the updated application.</b>	Category	Sub-Concept #	Missing Information	Please provide the following information
12	(12)	<b>Show or acknowledge that:</b> <i>"...the innovative concept is not to be partially or fully funded with a public incentive program."</i>	Recordkeeping	2.1-2.6	Application meets this requirement.	N/A
				2.7-2.8	See Item 6a.	N/A
13a	(13)	<b>Demonstrate your plan to maintain records that show that:</b> <i>"...information on fuel usage, routes, port calls, maintenance procedures, and emissions test results."</i>	Recordkeeping	2.1-2.6	Application meets requirement.	N/A
				2.7-2.8	See Item 6a.	N/A
13b	(13)	<b>Please acknowledge an understanding that:</b> <i>"Such records and reports shall be</i>	Recordkeeping	2.1-2.6	Application meets requirement.	N/A

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Item #	Applicable section of 93130.17	<b>Requirement Summary</b> <b>See 2020 Control Measure section 93130.17 for the complete text and requirement.</b> <b>Ensure that all requirements are met in the updated application.</b>	Category	Sub-Concept #	Missing Information	Please provide the following information
		<i>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>		2.7-2.8	See Item 6a.	N/A
14	(14)	<b>Please acknowledge an agreement that:</b> <i>"No person shall operate under an</i>	General provisions	2.1-2.6	Application meets this requirement.	N/A



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Item #	Applicable section of 93130.17	<b>Requirement Summary</b> <b>See 2020 Control Measure section 93130.17 for the complete text and requirement. Ensure that all requirements are met in the updated application.</b>	Category	Sub-Concept #	Missing Information	Please provide the following information
		<i>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>		2.7-2.8	See Item 6a.	N/A
15	(15)	<b>Explain your implementation plan, showing that:</b> <i>"The innovative concept will be</i>	Timeframe	2.1-2.6	Application meets this requirement.	N/A

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Item #	Applicable section of 93130.17	<b>Requirement Summary</b> <b>See 2020 Control Measure section 93130.17 for the complete text and requirement. Ensure that all requirements are met in the updated application.</b>	Category	Sub-Concept #	Missing Information	Please provide the following information
		<i>implemented within the timeframe needed to be used for compliance with this Control Measure, including any time needed for environmental review (if applicable)."</i> <b>Also see Item 24 (93130.17 (b)(1)(H)) and section 93130.17 (b)(3)(E).</b>	Governmental and Environmental Approvals	2.7-2.8	See Item 6a.	N/A
16	(16)	<b>Please acknowledge agreement that:</b> <i>"No person shall comply with this section by operating under an innovative concept that has been revoked as provided in section 93130.17(f) of this Control Measure."</i>	General provisions	2.1-2.6	Application meets requirement.	N/A
				2.7-2.8	See Item 6a.	N/A

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Item #	Applicable section of 93130.17	<b>Requirement Summary</b> <b>See 2020 Control Measure section 93130.17 for the complete text and requirement.</b> <b>Ensure that all requirements are met in the updated application.</b>	Category	Sub-Concept #	Missing Information	Please provide the following information
	<b>93130.17 (b)(1)</b>	<i>"Applications for innovative concepts shall contain, at a minimum, the following information:"</i>	N/A	N/A	N/A	N/A
17	(A)	<i>"Company name, address, and contact information."</i>	Applicant information	2.1-2.6	Application meets this requirement.	N/A
				2.7-2.8	See Item 6a.	N/A
18a	(B)	<i>"A description of the proposed innovative concept(s) including source and scope of emission reductions."</i>	Description of IC	2.1-2.6	Application meets this requirement.	N/A
				2.7-2.8	See Item 6a.	N/A
18b	(B)	<i>"A description of proposal including a project site plan and a location map."</i>	Location of IC	2.1-2.6	Project site plan and location map.	Map of project locations with scale to infer distance to adjacent communities.
				2.7-2.8	See Item 6a.	N/A

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Item #	Applicable section of 93130.17	<b>Requirement Summary</b> See 2020 Control Measure section 93130.17 for the complete text and requirement. Ensure that all requirements are met in the updated application.	Category	Sub-Concept #	Missing Information	Please provide the following information
19	(C)	<b>An estimate of the vessel emissions planned to be covered under the innovative concept for each pollutant NOx, PM 2.5, and ROG. 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."</b>	Emissions Reduction Estimates and Calculations	2.1-2.6	Application meets this requirement.	N/A
				2.7-2.8	See Item 6a.	N/A

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20	(D)	<i>"The proposed recordkeeping, reporting, monitoring, and testing procedures that will be used to demonstrate reductions."</i>	Recordkeeping	2.1-2.6	Annual reporting methodology and including information that will be recorded and tracked.	The reporting and recordkeeping are critical elements of the application where CARB requires additional information. In Section 9.5 of your Application, CAEM stated that "Data reporting to CARB will occur on an annual basis consistent with the requirements of the Control Measure, Section 93130.17(d), unless a different reporting frequency is specified in the Executive Order issued as approval of this application. The entirety of the Emission Reduction Credit Database and summaries of the data contained in the database will be provided electronically." However, CARB additionally requests the annual reporting methodology for all sub-concepts, 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 CAEM 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.
				2.7-2.8	See Item 6a.	N/A

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Item #	Applicable section of 93130.17	<b>Requirement Summary</b> See 2020 Control Measure section 93130.17 for the complete text and requirement. Ensure that all requirements are met in the updated application.	Category	Sub-Concept #	Missing Information	Please provide the following information
21	(E)	<b>Any MOUs or similar agreements between the applicant and any partners. (See full Control Measure text for all applicable details).</b>	Funding	2.1-2.6	The Application states that "MOU's do not currently exist due to the early stage of development"	Please provide a list of any MOUs or similar agreements that are in place or may need to be established to execute the sub-concepts.
				2.7-2.8	See Item 6a.	N/A
22	(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	2.1-2.6	Extension requests for concepts.	An extension wouldn't be available for sub-concepts 2.1, 2.2, and 2.3 as early compliance ends after mandatory compliance begins in 2025, or 2027. Please indicate whether an extension may be requested for the other sub-concepts.
				2.7-2.8	See Item 6a.	N/A

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Item #	Applicable section of 93130.17	<b>Requirement Summary</b> <b>See 2020 Control Measure section 93130.17 for the complete text and requirement.</b> <b>Ensure that all requirements are met in the updated application.</b>	Category	Sub-Concept #	Missing Information	Please provide the following information
23	(G)	<i>"A summary of all governmental approvals necessary to enable development of the innovative concept."</i>	Governmental and Environmental Approvals	2.1-2.6	Application meets this requirement	N/A
				2.7-2.8	See Item 6a.	N/A
24	(H)	<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	2.1-2.6	Application meets this requirement.	N/A
		2.7-2.8		See Item 6a.	N/A	
25	(I)	<b>Provide</b> <i>"Any information necessary to demonstrate that the proposed innovative concept meets all [the following] eligibility and applicability requirements in subsection 93130.17(a)"</i> <b>as shown above in Items 1 through 16.</b>	See Items 1 through 16	2.1-2.6	See Items 1 through 16.	N/A
				2.7-2.8	See Item 6a.	N/A