

May 22, 2025

Nicholas Tonsich, President
Clean Air Engineering - Maritime, Inc.
2500 Via Cabrillo Marina
San Pedro, California, 90731
ntonsich@caemaritime.com

Dear Nicholas Tonsich:

California Air Resources Board (CARB) staff has reviewed Clean Air Engineering - Maritime, Inc.'s (CAEM) "METS-1 Test Report", dated March 4, 2025, and supplemental information submitted on March 7, 2025, for the METS-1 barge-based capture and control system.

The purpose of the Test Report was to provide emission measurements and associated information to support the development of approved operation conditions for the METS-1 for use as a CARB Approved Emission Control Strategy (CAECS) by roll on/roll off (ro-ro) vessels in accordance with CARB's Control Measure for Ocean-Going Vessels At Berth, title 17, California Code of Regulations 93130 *et seq* (2020 At Berth Regulation). The METS-1 was previously approved as an alternative control technology under title 17, California Code of Regulations section 93118.3 (d)(2) and (e). Per section 93130.5(d)(3) of the 2020 At Berth Regulation, this strategy was approved as a CAECS only for container vessels in 2020. In order to continue using the METS-1, an extension of the CAECS approval is required as described in section 93130.5 (i)(1). CAEM requested extension of the METS-1 system for container vessels and approval for operation on auto carriers/roll-on roll-off (ro-ro) vessels.

This letter addresses CAEM's request as it pertains to ro-ro vessels only; a separate letter addresses CAEM's request as it pertains to container vessels.

CARB staff's review of the CAEM Test Report was based on the requirements in the 2020 At Berth Regulation, the guidelines provided in CARB's "Revised Performance and Testing Guidelines for Emissions Control Strategies on Ocean-Going Vessels," and the CAEM Test Plan dated May 14, 2024, and approved on June 11, 2024.

We are pleased to inform you that we have confirmed the results of the emissions measurements which demonstrate the METS-1 meets all of the requirements of section 93130.5, including being grid neutral, and are issuing the attached Executive Order G-25-095. Executive Order G-25-095 identifies the monitoring, reporting, and recordkeeping requirements for the METS-1, and stipulates the approved operating conditions for the use of the METS-1 as a CAECS which are identified in the table below.

The METS-1 has been granted EO G-25-095 under the 2020 At Berth Regulation, California Code of Regulations, title 17, section 93130.5(e)(3) and may operate under the terms specified in the EO for five years as a CAECS before needing to apply for an extension, as specified in section 93130.5(i)(1).

In closing, we appreciate the opportunity to work with CAEM in its efforts to implement a barge-based capture and control system to treat ro-ro vessel auxiliary engine emissions while at berth. If you have any questions, please contact Angela Csondes, Manager, Marine Strategies Section at angela.csondes@arb.ca.gov. In addition, please feel free to contact Sam Bailey, Air Pollution Specialist, Marine Strategies Section at samuel.bailey@arb.ca.gov.

Sincerely,

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

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

Attachment: Executive Order G-25-095

cc: Angela Csondes, Section Manager, Marine Strategies Section