



9300 Arrowpoint Blvd.
Charlotte NC 28273

July 6, 2022

Ms. Bonnie Soriano
Chief, Freight Activity Branch
California Air Resources Board
1001 I Street
Sacramento, CA 95814
Delivered via email to Bonnie.Soriano@arb.ca.gov

Dear Ms. Soriano,

As you know, Maersk has been asked to allow on-vessel stack gas testing to demonstrate the effectiveness of two remote-sensing technologies for determining and enforcing fuel sulfur limits. Major participants in the work are CARB, US EPA, MARAD, UCLA, UC-Riverside/CE-CERT, US Coast Guard and providers and operators of the technologies to be tested. The testing team currently plans to sail with the container vessel Gerner Maersk from LA to Oakland on or about August 6th, 2022.

The testing plan (attached) requires operations on both standard marine fuel (<0.5%S) and fuel compliant with the North American Emissions Control Area (ECA) and California OVG fuel regulations (<0.1%S). Therefore, we respectfully request an exemption to the California OGV Fuel Rule to allow the use of these fuels as required for the testing plan. FYI We will also be requesting any needed MARPOL VI exceptions by the US Coast Guard and the Flag State Administration (Denmark).

I'm happy to answer any questions you may have or provide further information if it will be helpful. Thank you for your attention to this request.

Sincerely,

A handwritten signature in black ink that reads "Lee Kindberg". The signature is written in a cursive style with a large, looping 'L' and 'K'.

Lee Kindberg, PhD, GCB.D
Head of Environment & Sustainability, North America

Cc: Alex Barber, Debbi Klossing, Angela Csondes, Elizabeth Melgoza - CARB (email)