



THE FUTURE OF EMISSIONS
CAPTURE AND CONTROL

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6/30/2022

Chief, Transportation and Toxics Division
California Air Resources Board
1001 I street
Sacramento, CA 95814

RE: STAX Engineering Comments on At Berth Innovative Concepts for CAEM, Shell, and Tesoro

STAX Engineering provides maritime air pollution control services including our state-of-the-art capture and control STAXbox technology. STAX Engineering appreciates the opportunity to offer comments on the At Berth Innovative Concept Applications for Shell, Tesoro, and CAEM. The four concepts involve banking and trading of emission reductions from regulatory over-compliance to allow greater flexibility in meeting California's at-berth regulatory requirements.

We are in support of these innovative concepts and agree that they will aid in optimizing the utilization of the various compliance strategies including our STAXbox technology. Such capital-intensive technology needs full utilization to be an effective regulatory compliance option, and the concepts proposed by the three companies will offer more flexibility and a more certain path forward to building out this important technology. As an integral part of California's air pollution strategy, capture and control technology will benefit from these concepts ensuring that the At-Berth regulation meets its air pollution goals.

We would encourage California Air Resources Board (CARB) to approve the above innovative compliance concepts and to make certain that the banking and trading concept is applied as broadly as applicable. Specifically, we ask that the banking and trading concept be available to all fleets, terminals, and ports subject to the At Berth regulation. Allowing the full participation guarantees the successful implementation of the program by ensuring that the market is sufficient size to encourage participation in the program as well as providing incentives for early implementation of technology necessary to meet the regulatory goals of the regulation.

In closing, we see the banking and trading concept as a benefit for air quality as well as the regulated community as it will add compliance flexibility without reducing the regulation's clean air goals. We encourage CARB to make the concept open to all fleets, terminal, and ports subject to the regulation as a larger market will encourage greater participation ensuring its successful implementation.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Walker", with a long horizontal flourish extending to the right.

Michael Walker
CEO
STAX Engineering