

Alejandro Marquez  
August 24, 2011  
11-6-1

California Environmental Protection Agency  
California Air Resources Board  
Chairman Mary Nichols  
1001 "I" Street  
Sacramento, California 95812

Re: AB 32 California Global Warming Solutions Act of 2006  
CARB Public Meeting Agenda August 24, 2011 Item # 11-6-1

Su: Public Comment Request To Not Approve & Adopt The  
Final Supplement to the AB32 Scoping Plan Functional Equivalent Document

Dear Chairman Nichols & Members of the Board:

I wish to submit my public comments requesting that the California Air Resources Board (CARB) not approve and adopt the proposed the Final Supplement to the AB32 Scoping Plan Functional Equivalent Document. I believe that the ARB staff did not do an adequate job in researching, identifying and recommending new emerging Green House Gas reduction alternative technologies.

I wish to share with you one technology I believe can contribute to reducing green house gas emissions from ship smoke stack exhaust and locomotive engine exhaust which was not included in the AB 32 Scoping Plan.

Advanced Cleanup Systems, Inc. has developed one technology that is applicable to two industries.

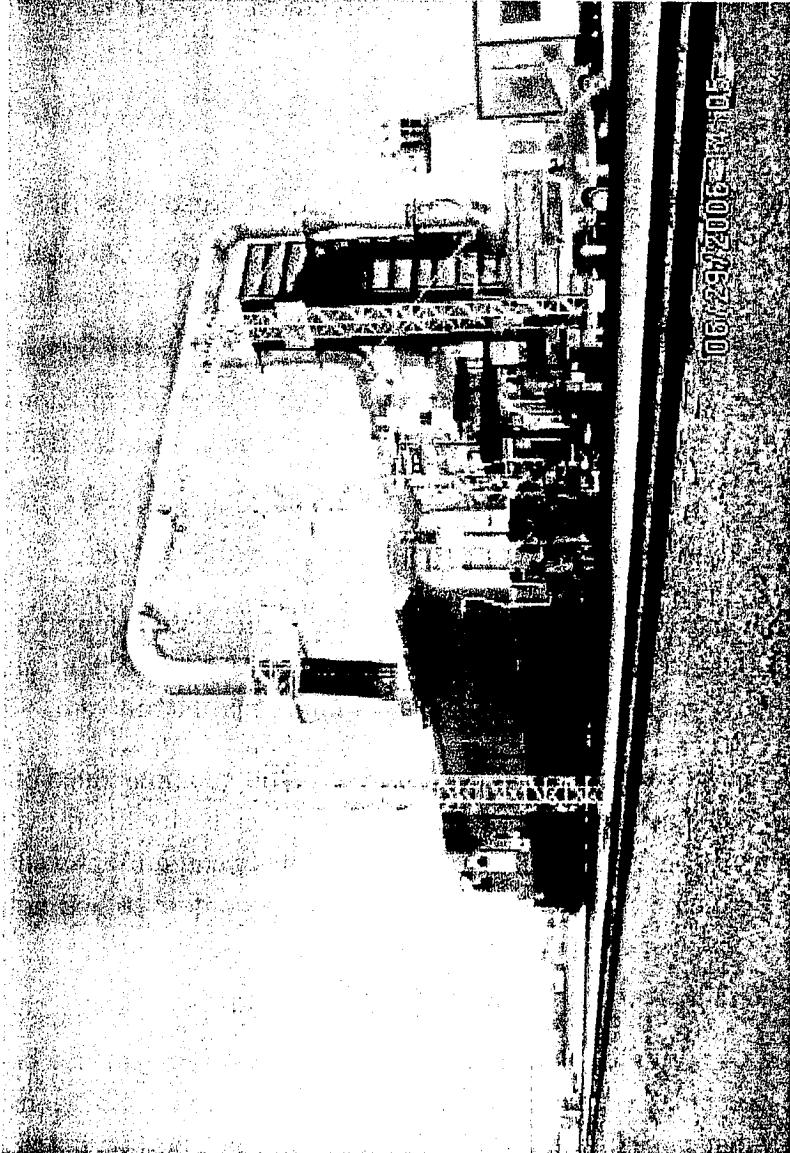
1. The Advanced Locomotive Emissions Control System (ALECS) was successful demonstrated at Roseville Railyard in 2007. The test results disclosed that ALECS captured 92%-98% of all emissions. There is no other technology that can capture locomotive emissions at a rail yard.
2. The Advanced Maritime Emissions Control System (AMECS) was successfully demonstrated on three different ships at the Port of Long Beach in 2008-2009. The test results disclosed that AMECS captured 92%-98% of all emissions. Note: Electric Shore-Power can only prevent approximately 50% of ship emissions which come from the main engine while docked and not the auxiliary engines or boilers.

AMECS can capture main engine, auxiliary engine and boiler emissions. AMECS can be used in addition to electric shore-power and on multiple ships at the same time. AMECS can also be built on a barge and taken outside the break water to meet a ship for additional emissions capture. There is no other technology that can capture ship exhaust emissions at a port or at sea.

Sincerely,

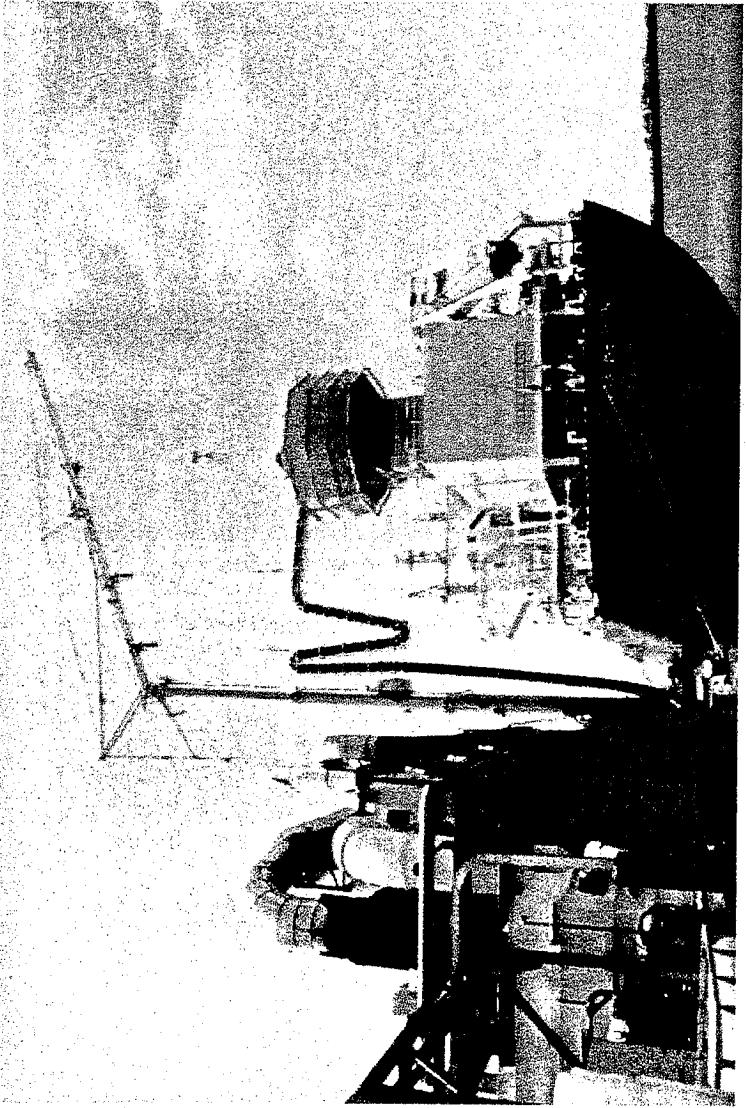


Alejandro N. Marquez  
Member, Coalition For A Safe Environment



## Advanced Locomotive Emissions Control System (ALECS)

ALECS consists of two major system components, the Exhaust Capture System (ECS) and the Emissions Treatment System (ETS). Locomotive train diesel fuel engines generate exhaust. The ECS collects exhaust gas emissions from the smoke stack using an emissions intake hose duct via a mechanical hood which is placed over the locomotive engine smoke stack while in maintenance or in rail yards. The ALECS System can be configured to have multiple bonnets to connect a series of locomotive engines and can be mounted on an overhead rail system which can traverse back and forth over the locomotive engines. The exhaust is drawn by a venturi fan blower through a flexible intake hose duct into the ETS for removal and treatment of harmful pollutants. The ETS utilizes state-of-the-art exhaust cleaning technologies such as a Pre-Conditioning Chamber to remove SO<sub>2</sub>, a Cloud Chamber Scrubber to remove PM and VOC's and a Selective Catalytic Reduction Reactor to remove NOX and VOC's. The ALECS technology can successfully remove Sulfur Dioxides (SO<sub>X</sub>) by 99%, Nitrogen Oxides (NOX) by 99%, Particulate Matter (PM) by 95.5% and Volatile Organic Compounds (VOC's) 97%. ALECS can be built in a building or alongside the rail tracks. The first successful demonstration was performed at the Union Pacific J.R. Davis Rail Yard in Roseville, California in 2006. Contact Info.: Advanced Cleanup Technologies, Inc., 20928 Lamberton Ave., Carson, California 90745, 310-763-1423 310-505-9636 [www.advancedcleanup.com](http://www.advancedcleanup.com)



## Advanced Maritime Emissions Control System (AMECS)

AMECS consists of two major system components, the Exhaust Capture System (ECS) and the Emissions Treatment System (ETS). Ships generate emissions from the ship service diesel generators exhaust (auxiliary engines) and auxiliary boiler exhaust gas. The ECS collects both auxiliary engine and boiler exhaust gas emissions from a ship's smoke stack using an emissions intake hose duct via a collapsible bellows capture bonnet which is placed over the smoke stack. The exhaust is drawn by a venturi fan blower from the bonnet through a flexible intake hose duct into the ETS for removal and treatment of harmful pollutants.

The ETS utilizes state-of-the-art exhaust cleaning technologies such as a Pre-Conditioning Chamber to remove SO<sub>2</sub>, a Cloud Chamber Scrubber to remove PM and VOC's and a Selective Catalytic Reduction Reactor to remove NOX and VOC's. The AMECS technology can successfully remove Sulfur Dioxides (SO<sub>2</sub>) by 99%, Nitrogen Oxides (NO<sub>x</sub>) by 99%, Particulate Matter (PM) by 95.5% and Volatile Organic Compounds (VOC's) 97%. AMECS can be built dockside to service ships at berth, built on a barge and tied alongside a ship while anchored out at sea or tied alongside a ship while being transported from sea or outer harbor to a port terminal dock. AMECS can be used when a ship is not retrofitted or built to plug into electric shore power or when there is no electric shore power available. The first successful demonstration was performed at the Port of Long Beach in 2008. Note: Not all shore power systems can stop boiler gas exhaust, so there may only be a 50% emissions reduction. Contract Info.: Advanced Cleanup Technologies, Inc., 20928 Lambertton Ave., Carson, California 90745, 310-763-1423, 310-505-9636 [www.advancedcleanup.com](http://www.advancedcleanup.com)

