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Cc: jack.duesler@nykgroup.com; takashi.capt.ito@nykgroup.com
Subject: Question for At berth regulation - exhaust gas measurement of Diesel generator engine
Date: Monday, July 27, 2020 7:59:49 PM

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To: California Air Resources Board
Fm: Mizutani/NYK LINE Tokyo
Date: July 28, 2020

Dear Sirs,

With reference to captioned, it would be appreciated if you could reply with explanation for my question below.

1. We suppose it is required that CO2E from control strategy must be grid-neutral in case the control strategy is external additional system.
In case of gas-fueled engine, there is no additional control system and we try to meet the regulation by the performance of engine alone,
therefore we suppose it is not necessary to consider grid-neutral, is it correct?
2. Since SCR system is not used as control strategy for our DF(LNG) engine,
we guess there is no point measuring ammonia because there is no factor to generate ammonia in exhaust gas.
Is it necessary to measure ammonia?
3. Is Engine load settings on testing(measurement of Gas of Diesel Generator engine) approved on 100%, 75%, 50%, 25% and 10% ? , and is it evaluated NOx, PM2.5 and ROG (g/kWh) shall be weighted averaged values calculated based on D2-test cycle (as well as IMO' NOx Technical Code)?
4. Is it considered that such CARB approved test is required for all engines one by one even if they are the same type of engine ? Or, is it considered that CARB will allow exemption of test of same type engine as previously tested engine ?

Best Regards,

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