



Electronic Submittal

November 16, 2022

Clerk of the Board
California Air Resources Board

RE: Ocean Going Vessel At Berth Regulation, Project Funding; '22-'23 Funding Plan for Clean Transportation Incentives; November 17, 2022 Agenda Item 22-15-5

Dear Board Members:

We ask the Board to include pollution control barges as a category for these incentives, to help jump-start compliance with CARB's at berth regulation.

Our company is positioned to provide compliance services to ships and ports impacted by CARB's recently updated OGV At Berth Regulation. In part, our services will capture OGV criteria pollutants with barge-mounted capture and control systems. For such barges and the subject Funding Plan, CARB has identified the Plan's Low Carbon Transportation – Advanced Technology Demonstration and Pilot Projects component as a source of incentives.

Where last year's '21-'22 funding plan did state that barge-mounted capture and control systems like ours will qualify for incentives, this year's funding plan has no such statement. There are a number of technology improvements for these barges where our company is planning to apply for CARB incentives, including low/zero emission barge propulsion/operation and control of OGV GHG pollution.

So far this CARB source for incentives has not solicited applications, though analyses by both CARB and our company have identified a large demand for OGV at berth regulation compliance services. With the regulation's compliance deadlines in the near term, we ask that CARB incentives support our work to achieve technology milestones and get more barges in place for compliance.

Please add barge-mounted capture and control systems as a category for incentives under this '22-'23 funding plan. Thank you.

Sincerely,

A handwritten signature in blue ink, appearing to read 'James Eleopoulos', written over a circular blue stamp or seal.

James "Jimmy" Eleopoulos, Managing Member