

Attachment 3

Corrections to the Initial Statement of Reasons for Rulemaking (Staff Report)

Fuel Sulfur and Other Operational Requirements for Ocean-going Vessels within California Waters and 24 Nautical Miles of the California Baseline

1. Corrections to Chapter VII list of references:

Note: The deleted references (*shown below in ~~strikeout~~*) were not cited in the text of Chapter VII, while the added references (*shown below in underline*) were cited in the text of Chapter VII, but were not listed as a reference at the end of the chapter. However, it should be noted that all references added to Chapter VII are already part of the administrative record because they were also listed as references to other chapters in the ISOR.

REFERENCES

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2. Corrections to the PM_{2.5} emission factors in Appendix D of the ISOR, Tables II-6, II-7, and II-8:

Note: The new correct PM_{2.5} emission factors are added below (shown in underline). The erroneous PM_{2.5} emission factors are deleted (*shown in strikeout*).

Table II-6: Main Engine Emission Factors – Transit Mode (g/kW-hr)

Engine Speed	Fuel	CH ₄	CO	CO ₂	NO _x	PM ₁₀	PM _{2.5}	ROG	SOx
Slow	Marine Distillate (0.1% S)	0.07	1.10	588	17.0	0.25	<u>0.23</u> 0.35	0.78	0.36
Slow	Marine Distillate (0.5% S)	0.07	1.10	588	17.0	0.38	0.35	0.78	1.90
Slow	Heavy Fuel Oil	0.08	1.38	620	18.1	1.50	1.46	0.69	10.5
Medium	Marine Distillate (0.1% S)	0.08	1.10	645	13.2	0.25	<u>0.23</u> 0.35	0.65	0.40
Medium	Marine Distillate (0.5% S)	0.08	1.10	645	13.2	0.38	0.35	0.65	2.08
Medium	Heavy Fuel Oil	0.09	1.10	677	14.0	1.50	1.46	0.57	11.5
High	Marine Distillate (0.1% S)	0.08	1.10	645	12.1	0.25	<u>0.23</u> 0.35	0.65	0.40
High	Marine Distillate (0.5% S)	0.08	1.10	645	12.1	0.38	0.35	0.65	2.08
High	Heavy Fuel Oil	0.09	1.10	645	12.7	1.50	1.46	0.23	11.5

Table II-7: Main Engine Emission Factors – Maneuvering Mode (g/kW-hr)

Engine Speed	Fuel	CH ₄	CO	CO ₂	NO _x	PM ₁₀	PM _{2.5}	ROG	SOx
Slow	Marine Distillate (0.1% S)	0.07	1.10	588	17.0	0.25	<u>0.23</u> 0.35	0.78	0.36
Slow	Marine Distillate (0.5% S)	0.07	1.10	588	17.0	0.38	0.35	0.78	1.90
Slow	Heavy Fuel Oil	0.08	1.38	620	18.1	1.50	1.46	0.69	10.5
Medium	Marine Distillate (0.1% S)	0.08	1.10	645	13.2	0.25	<u>0.23</u> 0.35	0.65	0.40
Medium	Marine Distillate (0.5% S)	0.08	1.10	645	13.2	0.38	0.35	0.65	2.08
Medium	Heavy Fuel Oil	0.09	1.10	677	14.0	1.50	1.46	0.57	11.5
High	Marine Distillate (0.1% S)	0.08	1.10	645	12.1	0.25	<u>0.23</u> 0.35	0.65	0.40
High	Marine Distillate (0.5% S)	0.08	1.10	645	12.1	0.38	0.35	0.65	2.08
High	Heavy Fuel Oil	0.09	1.10	645	12.7	1.50	1.46	0.23	11.5

Table II-8: Auxiliary Engine Emission Factors – Transit, Maneuvering, and Hotelling (g/kW-hr)

Engine Speed	Fuel	CH ₄	CO	CO ₂	NO _x	PM ₁₀	PM _{2.5}	ROG	SO _x
Medium	Marine Distillate (0.1% S)	0.09	1.10	690	13.9	0.25	0.35 0.23	0.52	0.40
Medium	Marine Distillate (0.5% S)	0.09	1.10	690	13.9	0.38	0.35	0.52	2.10
Medium	Heavy Fuel Oil	0.09	1.10	722	14.7	1.50	1.46	0.46	11.1