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August 9, 2007
Commander, U.S. Army Corps of Engineers,
Los Angeles District, c/o Dr. Spencer D. MacNeil
P.O. Box 532711
Los Angeles, California 90053-2325

✓ **Dr. Ralph Appy, Director Environmental Management Division**
425 South Palos Verdes Street
San Pedro, CA 90731



Re: DRAFT ENVIRONMENTAL IMPACT STATEMENT/ENVIRONMENTAL IMPACT REPORT (EIS/EIR) FOR THE BERTH 136-147[TRAPAC] CONTAINER TERMINAL PROJECT

Gentlemen:

We would like to comment on the above EIS/EIR regarding the Mitigation Measures outlined in Section 3.2 page 62-65.

The mitigation measures proposed are the application of Alternative Maritime Power (AMP) only, with no consideration of alternative technologies which are equivalent to or better than AMP. And, the schedule of use of AMP for ships calling at Berths 136-147 while hotelling is

- 2009 - 25 percent of total ship calls
- 2010 - 40 percent of total ship calls
- 2012 - 50 percent of total ship calls
- 2015 - 80 percent of total ship calls
- 2018 - 100 percent of total ship calls

Also, AMP would only cover auxiliary engines not the diesel fired boilers.

A very viable alternative technology which could be used to fill the time gap while waiting for full deployment of AMP (and be able to cover the boilers too), is the Advanced Maritime Emissions Control System (AMECS) developed and built by Advanced Cleanup Technologies Inc (ACTI). A full description of AMECS is provided in Appendix 1.

AMECS captures all the exhaust gas emissions from the ship's stack, including auxiliary engines and boilers, transfers them to a treatment unit on a barge tied to the container ship and reduces the NO_x, SO_x and PM. The full scale treatment unit, comprising a Cloud Chamber Scrubber and a Selective Catalytic Reactor system was used for test runs, sponsored by EPA, CARB, SCAQMD, Placer County APCD etc. conducted on large locomotive diesel engines in Union Pacific's repair yard. Both low sulfur CARB diesel and EPA diesel fuel were used. Results were reductions of 97% NO_x, 98% SO_x and 92% PM.

ACTI, Metropolitan Stevedore Company and the Port of Long Beach will be testing AMECS on ships' exhaust gases starting in October 2007 using a dock-based system. The AMECS system will be able to treat the exhaust gases from two ships simultaneously while they are berthed at Metropolitan's berths. Testing of the bonnet on ships' stacks will commence in August 2007

ACTI could supply enough AMECS barges to TraPac to handle the container ships not being AMP'd, including these ships which have not been retrofitted to accept AMP. AMECS does not require infrastructure investment by the Port or TraPac to supply high voltage electrical power and is not affected by power brown outs. Each barge has a power generator on board.

AMECS cost effectiveness is better than AMP.

San Pedro Bay Ports (SPBP) Clean Air Action Plan (CAAP) is complied with by use of AMECS;

- OGV-2; No electrical infrastructure is required
- OGV-3; AMECS can handle auxiliary marine engines burning fuels ranging from high sulfur bunker fuel oil to 0.2% Sulfur MGO to 15 ppm sulfur diesel
- OGV-4; AMECS can handle start of main engines for 15-30 minutes but is designed to service auxiliary marine engines and boilers.
- OGV-5; AMECS can reduce PM, NO_x and SO_x by over 90% in all fuels used in auxiliary marine engines and boilers by OGV's

The full scale AMECS treatment system has been successfully tested. The bonnet emissions capture system has been manufactured and will be tested on actual operating ships shortly.

We would like to request that you include AMECS as an alternative technology to AMP in the EIS/EIR for the Berth 136-147 TraPac container terminal project.

If you have any questions, please call me at 310-763-1423.

Sincerely,



Matthew F Stewart
Executive Vice President



Advanced Maritime Emissions Control System (AMECS)

Advanced Cleanup Technologies Inc.(ACTI) specializes in Full Service Environmental Waste Management.. The Company was founded in 1992 and provides innovative, cost-effective hazardous materials cleanup services to private industry and government regulatory agencies. ACTI has a highly skilled staff experienced in emergency response | cleanup and waste management services, with the capabilities to manage multiple incidents.

The technology developed by ACTI is a system to capture the exhaust emissions from various sources and treat the exhausted gas stream by removing harmful polluting gases and carcinogens prior to being exhausted into the atmosphere.

The systems are environmentally friendly and incorporate the latest in emissions control devices. They include several innovative exhaust capture systems, designed to accommodate the many geometries of exhaust stacks of ocean-going vessels. They are cost-effective, well under the target set by the Carol Moyer Program and designed for a life span of twenty- years.

Several patents have been awarded and applied for as a result of the design and development of the technology being developed by ACTI.

The Advanced Maritime Emissions Control System (AMECS) is designed for marine applications to capture and treat the exhaust emissions from ocean-going vessels while at anchorage within the harbor and while berthed for loading and unloading. There are two variations of the system, a Barge-Based and a Dock-Based configuration.

The Barge-Based system consists of four major subsystems. These are the Exhaust Capture Subsystem (Support Tower, Robotic Arm and Exhaust Intake Bonnet); Emissions Treatment Subsystem (Cloud Chamber Scrubber and Selective Catalyst Reduction (SCR) Reactor); Operation Control Subsystem (where the monitoring and control systems are housed); and a Seagoing Barge. Each AMECS will be serviced by support vessels, and monitored and maintained through a centralized support facility. It is designed to treat an exhaust flow of up to 12,000 scfm.