

March 2, 2022

Rick Shih
Martinez Refining Company
richard.shih@pbfenergy.com

Dear Rick Shih:

Thank you for submitting the Terminal Plan (Plan) on behalf of the Martinez Refining Company to the California Air Resources Board (CARB) as required by the Control Measure for Ocean-Going Vessels At Berth ("Regulation"). CARB staff has reviewed your Plan submittal against the requirements set forth in section 93130.14(a) of the Regulation, and have identified the Plan is missing the information required by the following provisions:

- Section 93130.14(a)(3)(F) of the Regulation requires the terminal to provide a schedule for installing equipment; and
- Section 93130.14(a)(3)(H) of the Regulation requires a terminal operator claiming that a physical and/or operational constraint will delay its ability to implement its preferred CARB-approved control strategy to achieve emission reductions from vessels at berth according to the requirements of section 93130 et seq., must also include with its terminal plan a technical feasibility study evaluating if there are any other emission control options that could be implemented more quickly at the terminal:
 - Although the Martinez Refining Company Terminal plan did provide a milestone schedule that stated that shore power and barge/shore-based capture and control system would not be feasible for six to 13 years after equipment is commercially available, the plan did not include, and we request that you submit, a technical feasibility study evaluating if there are any other control options that could be implemented more quickly at the terminal.

With respect to the division of responsibilities, we request clarifying language to describe the relationship between the Port and the terminal. Although it is our understanding that the terminal is an independent marine terminal, we request information that specifically details the responsibilities of the terminal and any that the Port may have for infrastructure.

CARB requests that a corrected Plan addressing the above deficiencies be re-submitted as an updated Plan to shorepower@arb.ca.gov within 90 days of receipt of this letter. Once CARB receives the updated Plan, staff will have 90 calendar days to review the corrected Plan and confirm completeness.

Additional information on Port and Terminal Plans can be found on CARB's website at: <https://ww2.arb.ca.gov/new-berth-regulation-implementation>.

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If you have any questions about the deficiencies identified by CARB, please contact Elizabeth Melgoza, Air Pollution Specialist, Marine Strategies Section, by email at elizabeth.melgoza@arb.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Bonnie Soriano". The signature is fluid and cursive, with the first name "Bonnie" written in a larger, more prominent script than the last name "Soriano".

Bonnie Soriano, Branch Chief, Freight Activity Branch

cc: Elizabeth Melgoza, Air Pollution Specialist, Marine Strategies Section