



December 29, 2021

Chief – Transportation and Toxics Division
California Air Resources Board
1001 I Street
Sacramento, CA 95814

VIA EMAIL: shorepower@arb.ca.gov

RE: Shore Terminals LLC, Selby (Crockett) Terminal Plan for At Berth Emissions
Terminal Address: 90 San Pablo Avenue, Crockett, CA 94525

To Whom it May Concern:

Below is the information required by Section 93130.14(a)(3) of California Air Resources Board's (CARB) At Berth Final Regulations for Shore Terminals LLC's (Shore Terminals) Selby Terminal located at 90 San Pablo Avenue, Crockett CA, 94525, in Contra Costa County. Shore Terminals' Selby location is subject to the regulation as it received 76 tankers in 2019. Berth ROD 8 included in this plan is located at the approximate coordinates: 38°03'29.77" N 122°14'33.54" W. Berth ROD 8 is regulated by the existing Marine Oil Terminal Engineering and Maintenance Standards (MOTEMS) terminal operating limits and is thereby restricted by those requirements.

The strategy details are as follows:

Shore Terminals has consulted with industry and third-party experts, such as Moffatt Nichols and DNV GL USA, Inc. Maritime, who have evaluated various technologies such as shore power and shore and vessel capture and control. They both independently determined that there is currently no commercially available means to comply with the regulation. Hence, it is unlikely that anyone will be able to comply with the 2020 At-Berth Regulation timeline. Shore Terminals reserves the right to continue to evaluate technologies as they become available. Even as technologies become available, they must be approved by multiple agencies before they can be implemented to comply with the regulation. Once an available strategy has been identified and received all required approvals, Shore Terminals will update this plan and provide it to CARB. Shore Terminals also reserves the right to evaluate all innovative compliance options as the terminal continues to plan for CARB compliance.

The equipment planned to be used would be a CARB Approved Emissions Control System (CAECS) at the Selby berth ROD 8, but as there is currently no commercial means to comply with the regulation, it is not known what vessels will use which specific strategy annually. As mentioned previously, Shore Terminals received 76 tankers in 2019.

Furthermore, since there are currently no commercial means to comply with the regulations, the completion date for installing the CAECS is dependent on CARB certification date.



If there are any questions about Shore Terminal's Plan to comply with Section 93130.14(a)(3) of CARB's At-Berth Regulations, please do not hesitate to contact Jennifer Polk, HSE Manager, at 916-509-3268.

Sincerely,

Jerome Jackson
General Manager, Pipeline and Terminal Operations – West Region

cc via email: Elizabeth Melgoza: elizabeth.melgoza@arb.ca.gov
Angela Csondes: acsondes@arb.ca.gov
Nicole Light Densberger: nicole.lightdensberger@arb.ca.gov