

Via Email: [shorepower@arb.ca.gov](mailto:shorepower@arb.ca.gov)

May 20, 2022

Bonnie Soriano  
Branch Chief, Freight Activity Branch  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

Re: California Air Resources Board (“CARB”) February 28, 2022 Letter

Dear Ms. Soriano:

Ultramar, Inc. and Shore Terminals LLC received the CARB’s February 28, 2022, letter and provide this response.

Letter Bullet 1: Section 93130.14(a)(3)(A) or the Regulation requires the terminal plan to identify and describe all necessary equipment, including whether it will be located on the vessel, wharf, shore, or elsewhere.

- The plan states that there is no way to comply with the Regulation but lists CARB-approved Emission Control Strategy (CAECS) as the equipment that will be used at berth 163. The requirement to reduce emissions from tankers in Southern California begins in 2025. Section 93130.14(a)(3)(A) 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 technology feasibility study evaluating if there are any other emission control options that could be implemented more quickly at the terminal. In addition, please provide any supporting information such as the Moffatt Nichols and DNV GL USA, Inc. Maritime reports that you reference in your plan to provide that the technology will not be available for use in 2025.

Response: Ultramar and Shore Terminals are not claiming that there is a physical or operational constraint that will delay their ability to implement their preferred CARB-approved control strategy. Ultramar and Shore Terminals have stated that there is currently no commercially available CARB-approved control technology to comply with the regulation. Ultramar and Shore Terminals base this position on the WSPA-commissioned technology assessment which was previously provided to CARB by DNV GL USA, Inc. Maritime. The DNV GL USE, Inc. technology assessment is provided with this response.

Letter Bullet 2: Section 93130.14(a)(3)(E) of the Regulation requires the terminal to provide any terminal/port specific berthing restrictions for each emission control technology. While the plan does mention berthing restrictions are regulated by the existing Marine Oil Terminal Engineering and Maintenance Standards (MOTEMS) terminal operating limits, we request

that the plan specifically details which specific berthing restrictions would present themselves at berth 163 for each emissions control strategy.

Response: Ultramar and Shore Terminals have not selected a control technology because there is currently no commercially available CARB-approved control technology(s) to comply with the regulation. They will be able to identify any specific berthing restrictions presented by the control technology(s) selected once CARB-approved control technologies are available.

Letter Bullet 3: Section 93130.14(a)(3)(F) of the Regulation requires the terminal to provide a schedule for installing equipment.

Response: As there are currently no commercially available CARB-approved technology(s) to comply with the regulations, a schedule for installing equipment cannot be provided at this time.

---

Ultramar and Shore Terminals are committed to evaluating control technologies as they become available. Once those technologies have received all required regulatory approvals, a control technology can be assessed and the terminal plan can be updated to reflect the specifics of the chosen control technology(s).

Sincerely,



Chris Vratil  
GM Pipeline & Terminal Operations  
West Coast  
Shore Terminals LLC



Kyle Sharon  
VP & General Manager  
Ultramar, Inc.