

February 28, 2022

Kurt Alvarado
Phillips 66 – Los Angeles Marine Terminal
kurt.s.alvarado@p66.com

Dear Kurt Alvarado:

Thank you for submitting the Terminal Plan (Plan) on behalf of the Phillips 66 Los Angeles Marine Terminal 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 for the barge-based capture and control system required by the following provisions:

- Section 93130.14(a)(3)(E) of the Regulation requires the terminal to provide any terminal/port specific berthing restrictions for each emissions control strategy. While the Plan mentions Berths 148/149 are not expected to be in service by the effective date of control requirements of the Regulation, please detail any restrictions for berths 150/151;
- 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:
 - The terminal Plan describes there are contractual limitations applicable to the terminal relevant to enacting the infrastructure since "there needs to be at least two CARB and IMO (International Maritime Organization) approved and accepted for safe interfacing with tanker vessels third-party vendors to ensure that competitive bids can be obtained before executing a contract with the successful bidder". The assurance of terminals to receive competitive bids for the purchase of emissions control equipment is not an exemption from compliance with the At Berth Regulation.

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" being larger and more prominent than the last name "Soriano".

Bonnie Soriano, Branch Chief, Freight Activity Branch

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