



Los Angeles Refinery
Phillips 66 Marine Terminal
150 Pier A Street Port of Los Angeles
Wilmington, CA 90744
www.phillips66.com

Certified Mail – Return Receipt Requested
Article Number:

November 30, 2021

CHIEF, TRANSPORTATION AND TOXICS DIVISION
CALIFORNIA AIR RESOURCES BOARD
1001 I STREET
SACRAMENTO, CA 95814

Re: TERMINAL PLAN SUBMITTAL

Dear Chief:

Attached is the Terminal Plan required by 93130.14(a).

Please note that due to the December 1, 2021, deadline and administrative constraints, anticipated references in the plan to a technology assessment conducted by DNV (“CARB OGV at Berth Regulation Emissions Control Technology Assessment for Tankers”) were unable to be included. As this plan must be jointly agreed to and approved with the Port of Los Angeles, Phillips 66 will submit a revised submittal later to incorporate any identified constraints, including other terminal-based compliance technologies, directly impacting the operability and safety of the ship/shore interface that is documented in this assessment.

If you have any questions or require additional information concerning this submittal, please contact John Matthews at (310) 522-8039 or by email at john.matthews@p66.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Bechtol".

Michael Bechtol
Environmental Manager

LARMT Terminal Plan Submittal

Electronic Copy:

shorepower@arb.ca.gov

Cc: acsondes@arb.ca.gov

Nicole.lightdensberger@arb.ca.gov

AColuso@portla.org

Bcc: john.matthews@p66.com

File: LARMT 2.7.1.12.2– HE13



Phillips 66 Company Los Angeles Marine Terminal At Berth Terminal Plan

This terminal plan has been prepared pursuant Section to 93130.14(a)(3) of the Airborne Toxic Control Measure for Auxiliary Diesel Engines Operated on Ocean-Going Vessels At Berth in a California Port.

1. GENERAL INFORMATION	
Terminal Contact Name: Kurt Alvarado	
Phone Number: (310) 952-6206	Email: kurt.s.alvarado@p66.com
<i>Berths Included in this Plan:</i>	
<u>Name:</u>	<u>Approximate Geographic Boundary Coordinates:*</u>
15. Port of Los Angeles Berths 148 / 149	15. 33.755776, -118.273676
16. Port of Los Angeles Berths 150 / 151	16. 33.754170, -118.271208
<i>*The number of berths on a terminal and the spatial positioning of berths are dependent on vessel size; thus, the geographic boundary coordinates are approximates only.</i>	
2. STRATEGY DETAILS	
<i>Strateg(ies) used to comply with the requirements for ocean-going vessels visiting each berth:</i>	
<ol style="list-style-type: none"> 1. Low-use terminal exemption 2. Third party barge-based CARB and IMO (International Maritime Organization) approved and accepted for safe interfacing with tanker vessel's capture and control system 	
2.1 [Strategy 1 – Low Use Terminal]	
<i>Identification and description of all necessary equipment:</i>	
<u>Equipment:</u>	<u>Location:</u>
1. None	1. n/a
Number of vessels expected to use this strategy (annual): Up to 19	
Number of vessel visits expected to use this strategy (annual): Up to 19	
<i>Berths where equipment will be used:</i>	
<ol style="list-style-type: none"> 1. Port of Los Angeles Berths 148 / 149 2. Port of Los Angeles Berths 150 / 151 	
<i>Schedule for installing equipment:</i>	
<u>Project:</u>	<u>Estimated Completion Date:</u>
1. n/a	1. n/a
2.2 [Strategy 2, if needed – Barge Based CAECS]	
<i>Identification and description of all necessary equipment:</i>	
<u>Equipment:</u>	<u>Location:</u>
1. Emission capture and control system that is CARB and IMO approved and accepted for safe interfacing with tanker vessels	1. Spudded (for station keeping) barge at vessel stern

Number of vessels expected to use this strategy (annual): Up to 40	
Number of vessel visits expected to use this strategy (annual): Up to 40	
<i>Berths where equipment will be used:</i>	
<ol style="list-style-type: none"> 1. Port of Los Angeles Berths 148 / 149 2. Port of Los Angeles Berths 150 / 151 	
<i>Schedule for installing equipment:</i>	
<u>Project:</u>	<u>Estimated Completion Date:</u>
<ol style="list-style-type: none"> 1. Third party vendor 	<ol style="list-style-type: none"> 1. Within 6 months of CARB certification of more than 2 vendors

3. TERMINAL OPERATOR/PORT BERTHING RESTRICTIONS

Are there any terminal or port specific berthing restrictions? If yes, please describe.

Port of Los Angeles Berths 148 / 149 are not expected to be in service by the effective date of control requirements of this regulation.

4. DIVISION OF ROLES AND RESPONSIBILITIES

Division of responsibilities for enacting infrastructure:

Port:

- Construction/permit approval through the Application for Port Permit (APP) process
- Provide equipment or necessary infrastructure at terminal as determined through Terminal's Permit (lease) with the Port
- Responsibility of uncontrolled emissions due to construction as determined by the Terminal's Permit (lease) with the Port
- Responsibility of uncontrolled emissions from repair of Port owned infrastructure/equipment

Terminal:

- Initiation of construction through the Application for Port Permit (APP) process
- Provide equipment or necessary infrastructure at terminal as determined through Terminal's Permit (lease) with the Port
- Responsibility of uncontrolled emissions due to construction as determined by the Terminal's Permit (lease) with the Port
- Responsibility of uncontrolled emissions from repair of terminal-owned infrastructure/equipment

Are there any contractual limitations applicable to the terminal relevant to enacting the infrastructure? If yes, describe.

There need to be at least two CARB and IMO approved and accepted for safe interfacing with tanker vessels third-party vendors to ensure competitive bids can be obtained before executing a contract with the successful bidder. Due to topside space limitations, land-based systems are not feasible, and electrification is not feasible due to tanker incompatibility and safety concerns.



<i>Port approval of responsibilities:</i> The Port's responsible officer confirms by signing below that he/she has reviewed the division of responsibilities set forth in Section 4 of this At Berth Terminal Plan and agrees to them under penalty of perjury. The Port does not make any representations or attestations about the accuracy, feasibility, or legality of the Terminal Operator's proposed compliance strategy set forth in this At Berth Terminal Plan.	
Name: Michael DiBernardo	Title: Deputy Executive Director
Port: Port of Los Angeles	
Signature: <i>Michael DiBernardo</i>	Date: 11/15/2021

5. SIGNATURE OF TERMINAL OPERATOR	
<i>By signing below, the Terminal Operator's responsible officer confirms under penalty of perjury that he/she has reviewed this At Berth Terminal Plan and is submitting this At Berth Terminal Plan as [Terminal Operator's] compliance strategy for the At Berth Regulation. [Terminal Operator] understands this plan is subject to verification by CARB staff.</i>	
Name: Tim Seidel	Title: G.M. Phillips 66 Los Angeles Refinery
Signature: <i>Tim Seidel</i>	Date: 10/27/21