



September 12, 2022

VIA ELECTRONIC MAIL

TRANSPORTATION AND TOXICS
DIVISION CALIFORNIA AIR
RESOURCES BOARD 1001 I
STREET SACRAMENTO, CA 95814
shorepower@arb.ca.gov

In re: At Berth Terminal and Port Plan

Dear CARB Staff,

Enclosed you will find the terminal and port plan for the following facilities:

- National City Marine Terminal- approximately 130-160 vessel calls annually
- Tenth Avenue Marine Terminal- approximately 90-110 vessel calls annually
- B Street Cruise Ship Terminal- approximately 90-100 vessel calls annually
- Broadway Cruise Ship Terminal- approximately 12-14 vessel calls annually

Noting that the Broadway facility is not currently required to submit a plan due to its low vessel activity as noted above- with some years as low as only 3 vessel calls. While much progress has been made, the largest obstacle has continued to be securing funding. We appreciate any assistance CARB may be able to provide in assisting us and our terminal operators, in order to meet the mutually desired objective.

Thank you,

Port of San Diego

Cc: Angela Condes, CARB; Chris Hamlin-PAS; Sophie Silvestri-PAS; Joe Stuyvesant-POSD; Michael LaFleur- POSD; Joel Valenzuela-POSD; Josefina Khalidy-POSD; Renée Yarmy-POSD

National City Marine Terminal: Port of San Diego & Pasha Automotive Services At Berth Port Plan

This At Berth Port Plan has been prepared pursuant Section 93130.14(b)(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

Port Contact Name: Renee Yarmy

Phone Number:
(619)455-6782

Email: ryarmy@portofsandiego.org

Terminals Included in this Plan:

Name:

National City Marine Terminal

Geographic Boundary Coordinates:

Berths	Latitude	Longitude
24-1	32.657207	117.118634
24-2	32.656972	117.121566
24-3	32.656313	117.122393
24-4	32.655147	117.122119
24-5	32.652388	117.121415
24-10	32.648346	117.116212
24-11	32.649059	117.113659

2. TERMINAL DETAILS

Terminal details can be found on the subsequent pages.

2.1. [Name of Terminal Operator – Pasha Automotive Services]

Identification and description of which strateg(ies) the terminal will use for compliance:

Pasha Automotive Services (“PAS”) and the Port of San Diego (“Port”) plan to facilitate 3 methods of compliance at the National City Marine Terminal: traditional shore power (cold-ironing), barge based bonnet and an alternative emission control strategy utilizing energy from hydrogen fuel cells for a vessel plug-in.

Nothing in this At Berth Port Plan constitutes an approval of any specific improvement/project. The District will comply with all applicable law when pursuing implementation of the improvements/projects, including, but not limited to, conducting environmental review pursuant to the California Environmental Quality Act (CEQA).

Equipment purchases and/or construction that are in progress or must still be completed to reduce emissions:

- Trenching, construction and installation of four (4) Shore Power Outlet (SPO) boxes, plugs and terminal infrastructure to support shore power (cold ironing). Three (3) grants have been submitted to support this effort: 2021 VW Mitigation Trust, Federal RAISE grant, Federal PIDP grant.
- Utilization of hydrogen energy in the form of mobile fuel cells to power a vessel at berth with available technology
- Port of San Diego RFP for a barge-based bonnet to capture emissions for vessel that have not been retrofitted to accept shore power plug-ins to be operational by the compliance start date for roll-on roll-off vessels of January 1, 2025.
- Funding still in process of being obtained for all options

Schedule for installing equipment and/or any necessary construction projects:

<u>Project:</u>	<u>Estimated Completion Date:</u>
1. 4 Shore Power SPO boxes	1. 1 SPO Box December 20, 2024, 3 remaining SPO Box(es) December 2030
2. Utilization of H2 power	2. December 30, 2024
3. Barge based bonnet system, also known as an emission capture and control system (ECCS)	3. December 20, 2024

Division of responsibilities for enacting infrastructure:

Port:

The Maritime, Planning & Green Port, Government & Civic Relations, and Engineering & Construction Divisions will be responsible for the grant solicitation, design and construction management of the shore power system. Port staff has already submitted grant solicitation, and finalized a study to determine costs, timelines, and funding requirements to pursue shore power. Additionally, the Port released a Request for Proposal (RFP) for a barge-based bonnet capture and control system in October 2021 with the anticipated project start date to design, build, etc. by June of 2022. The Port will own the barge-based bonnet capture and control system and will charge a fee for its use. The shore power system is expected to be used for approximately 20% of the vessel calls (estimated two vessels weekly) and the barged-based bonnet capture and control system is expected to be used for 80% of the remaining vessel calls until additional technologies / shore power systems are installed at NCMT.

Two vessels represent an estimated 20-25% of the vessel calls on average to NCMT annually, whereas the remaining vessel visits are most often one-time to two-time visitors to NCMT representing an estimated average of 65% of vessel calls to the terminal. There are a handful of vessels that visit the terminal three to six times a year representing approximately 11-15% of the vessel calls.

Terminal Operator:

PAS may provide an alternative solution to vessels at berth (H2 power), if operationally and commercially feasible.

PAS Executive and Operations Management will be responsible for implementation and operation of the infrastructure.

Terminal Operator approval of responsibilities:

The responsible officer of Pasha Automotive Services at the National City Marine Terminal confirms by signing below that he/she has reviewed the division of responsibilities set forth in Section 2.1 of this At Berth Port Plan and agrees to them under penalty of perjury.

Name: Chris Hamlin

Title: Senior Vice President

Signature: *Chris Hamlin*

Date: Aug 29, 2022

3. PORT-SPECIFIC BERTHING RESTRICTIONS

[write "none" if there are none; otherwise:]

Terminal:	Berthing Restriction:
1. NCMT	1. Structural repairs required for 24-1, 24-2, 24-3, 24-11 to support trenching 2. Draft Restrictions of 35 ft. for all berths 3. South bay access is limited to 200ft height restriction at the Coronado bridge to access berths

4. SIGNATURES

The Port's responsible officer confirms by signing below that he/she has reviewed the division of responsibilities between the Port and the Terminal Operators that are identified in this At Berth Port 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 any of the Terminal Operators' proposed compliance strategies set forth in this At Berth Port Plan.

Name: Mike LaFleur

Title: Vice President, Maritime

Signature: *Michael LaFleur*

Date: Sep 7, 2022