

**IMTT-Richmond-CA**  
**CARB At Berth Terminal Plan**  
**July 2023**

This terminal plan has been prepared pursuant to Section 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.

IMTT has two operational berths, Dock 17A and Dock 17B. Dock 17B does not receive any tankers, thus, the regulation does not apply to 17B. Therefore, a terminal plan is only required for dock 17A. Additionally, IMTT is currently operating under the exemption of a low activity terminal, as our average vessel visits per year is less than 20-vessels. Since we had 23-vessel visits in 2022, IMTT is complying with Section 93130.14(a)(2)(E): *low use terminals that exceed the terminal threshold shall submit a terminal plan by July 1 the following year.*

<b>STRATEGY DETAILS</b>
<p><b>93130.14(a)(3) – Terminal Plan Strategy used to comply with the requirements for ocean-going vessels visiting each berth:</b></p> <p>Third party land-based capture and control system.</p>
<p><b>93130.14(a)(3)(A) – Identification of and description of all necessary equipment, including whether it will be located on the vessel, wharf, shore, or elsewhere:</b></p> <p>CAECS mobile land-based capture and control system will be located on dock (space permitting) or along roadway, adjacent to shore.</p>
<p><b>93130.14(a)(3)(B) – Number of vessels expected to visit the terminal using this strategy:</b></p> <p>25-vessels will use this strategy.</p>
<p><b>93130.14(a)(3)(C) – List of each berth with geographical boundary coordinates:</b></p> <p>Dock 17A: 37.921, -122.369 (approximate geographical coordinates)</p>
<p><b>93130.14(a)(3)(D) – Identify berth(s) where equipment will be used:</b></p> <p>Dock 17A</p>
<p><b>93130.14(a)(3)(E) – Terminal/port specific berthing restrictions:</b></p> <p>IMTT complies with all Federal, State, and local requirements. Terminal restrictions are documented in the Terminal Operating Limits as approved and regulated by the California State Land Commissions (CSLC) in compliance with California Building Code Chapter 31F: Marine Oil Terminal Engineering and Maintenance Standards (MOTEMS).</p>

**93130.14(a)(3)(F) – Schedule for installing equipment:**

Within six (6) months of at least two (2) or more CARB approved land/shore-based vendors operating in the Bay Area with available capacity to service IMTT OR by the CARB compliance deadline date of 2027 (whichever is later).

**93130.14(a)(3)(G) – Division responsibilities between the terminal operator and the port, including contractual limitations applicable to the terminal, relevant to enacting the infrastructure required by each terminal's plan:**

The terminal and dock are privately owned by IMTT and does not fall under the jurisdiction of a Port Authority.

**93130.14(a)(3)(H) – 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:**

According to CARB's *Ocean-Going Vessels At Berth Interim Evaluation Report*, the Santa Fe Channel has "a naturally narrow channel and does not provide enough room for a barge at any location", thus, barge-based capture and control systems are currently not feasible to serve IMTT. In addition, for competitive bidding to occur, there needs to be at least two third-party shore/land-based capture and control systems available in the market. IMTT notes this is already a challenge, as the only CARB approved shore-based vendor available is not responsive to IMTT's needs of complying to the At Berth regulation.

**SIGNATURE OF TERMINAL OPERATOR**

**93130.14(a)(4): 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 the IMTT compliance strategy for the At Berth Regulation. Terminal personnel understand this plan is subject to verification by CARB staff.**

Name: Nicole Lucas Title: EHS&S Manager

Signature:  Date: 06/21/2023