



November 29, 2023

SENT VIA EMAIL

Chief, Transportation and Toxics Divisions
California Air Resources Board
1001 I Street, Sacramento, CA 95814
Email: shorepower@arb.ca.gov

Re: At-Berth Terminal Plan, Revised Submission

Dear Chief:

In accordance with the Final Regulation Order, Control Measure for Ocean Going Vessels at Berth, specifically section 93130.14 Terminal Plan and Interim Evaluations, IMTT submits it's revised Terminal Plan. IMTT-Richmond-CA will be utilizing the Terminal Exemption as a low activity terminal pursuant to Section 93130.10(a)(2) as its compliance strategy. To date, IMTT has had 13-vessels visits and will not see an additional 7-vessels within the next month to trigger the 20-vessel threshold for a second year.

If you have any questions or require additional information concerning this submittal, please contact me at (510) 412-5709 or by email NicoleLucas@imtt.com.

Sincerely,

Nicole Lucas
EHS&S Manager

**IMTT-Richmond-CA
CARB At Berth Terminal Plan
Revised November 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.

1. STRATEGY DETAILS
<p>93130.14(a)(3) – Terminal Plan Strategy used to comply with the requirements for ocean-going vessels visiting each berth:</p> <p>No controls are planned; 193130.10(a)(2) Terminal Exemptions / Low Activity Terminal.</p>
<p>1.1 Strategy 1</p>
<p>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:</p> <p>None – Terminal Exemption / Low Activity Terminal</p>
<p>93130.14(a)(3)(B) – Number of vessels expected to visit the terminal using this strategy:</p> <p>19</p>
<p>93130.14(a)(3)(C) – List of each berth with geographical boundary coordinates:</p> <p>Dock 17A: 37.921, -122.369 (approximate geographical coordinates)</p>
<p>93130.14(a)(3)(D) – Identify berth(s) where equipment will be used:</p> <p>Not Applicable</p>
<p>93130.14(a)(3)(E) – Terminal/port specific berthing restrictions:</p> <p>Not Applicable</p>
<p>93130.14(a)(3)(F) – Schedule for installing equipment:</p> <p>None – Terminal Exemption / Low Activity Terminal</p>
<p>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:</p>

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:

Not Applicable

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: 11/29/2023