Ramine Ross
Senior Manager, Southern California Regulatory Affairs

August 30, 2024

Ms. Bonnie Soriano
Chief, Freight Activity Branch
California Air Resources Board
1001 I Street
Sacramento, California 95812

submitted via email to: bsoriano@arb.ca.gov

Re: WSPA Comments on CHC Regulation Technical Working Group Workshop #3

Dear Ms. Soriano,

Western States Petroleum Association (WSPA) appreciates this opportunity to provide comments regarding the California Air Resources Board (CARB) staff presentation during the Commercial Harbor Craft Regulation (CHC) Regulation Technical Working Group (TWG) Workshop #3, held on August 7, 2024. WSPA is a non-profit trade association representing companies that explore for, produce, refine, transport and market petroleum, petroleum products, natural gas, and other energy supplies in California and four other western states.

While WSPA appreciates that the August 7th TWG Workshop focused on technology adoption and implementation, the majority of the discussion has been focused on vessels rather than marine terminals. We request that the CARB consider the safety and feasibility challenges of harbor craft involved in transporting and transferring flammable petroleum products attempting to implement shore power while alongside marine oil terminals.

The comments provided below are intended to serve as a basis for the requested discussion between CARB and key stakeholders regarding critical unresolved marine oil terminal-related technical issues in advance of further rulemaking or any potential enforcement of the existing regulations. Specifically, WSPA seeks to facilitate discussions between marine terminals and CARB staff to:

(1) establish a clear understanding of applicability;
(2) define limitations in infrastructure options;
(3) consider a reasonable implementation timeline; and
(4) address the shore power requirement in a manner consistent with the ongoing CARB At Berth Regulation process.

During the August 7th TWG Workshop, the Implementation Panel shared the recognition and appreciation around the importance of CARB's extension process while technical issues are under review. WSPA echoes this appreciation.

Electrification and Safety Requirements

During the August 7th TWG Workshop, the United States Coast Guard (USCG) presented their Design Change Review and Completed Work Inspection Requirements. That presentation did not address the safety elements related to electrification and vessel safety at marine oil terminals, where operators must manage the risks associated with having electrical cables connections

where one or both ends of the cable are in or going through a hazardous area. While WSPA appreciates the comments shared by the Port of San Diego during the August 7th TWG Workshop Implementation Panel, it was noted that there were no hazardous area applications in their installations.

WSPA requests that CARB provide insight as to how CARB and the USCG are jointly considering safety and operational feasibility of the proposed marine oil terminal electrification requirements. Any insights from CARB and/or the USCG would be appreciated by WSPA and its member companies. Information on how the USCG is addressing electrification requirements as it applies the risks of electrical cable connections in hazardous areas would be of great value going forward.

It is noteworthy that there is no existing equipment or technology approved by the maritime industry to safely supply shore power to petrochemical tank barges or tugs while operating in an electrically classified or hazardous area. Electrical hazardous areas are necessary to ensure safety in environments where there is a potential for an explosive atmosphere due to the presence of flammable gases, vapors, or dust. Classified areas are set forth in the American standards in the National Fire Protection Association (NFPA) 70 and National Electrical Code (NEC) Article 500.4. These standards explicitly state what electrical equipment can operate within, or pass through, a classified area. The USCG has adopted the NFPA Standards along with numerous other national and international standards, by reference, and enforces compliance with these standards onboard vessels. Presently, WSPA is unaware of any certified and compliant systems that will safely transfer power through classified areas, in compliance with all safety and regulatory requirements, to petrochemical tank barges and tugs coupled with tank barges.

Implementation Readiness

WSPA is unaware of any assessment of electrification implementation readiness. WSPA requests that CARB provide feedback on the electrification readiness of petrochemical tank barges or tugs operating throughout the state of California and shore power infrastructure installation readiness for petrochemical tank barges or tugs that would operate in an electrically classified or hazardous area. In addition, WSPA would appreciate any insights from CARB that have been provided through the recent vessel reporting.

It is WSPA's understanding that guidance documents (including design recommendations) for certain types of vessels are under development but have not yet been released. To date, it appears that not even preliminary guidance is available for onshore power supply systems for petrochemical tank barges or tugs. Further, it is apparent that currently there is no initiative to develop the required unique shore power solutions for petrochemical tanks barges and tugs.

Feasibility Studies

WSPA requests CARB verify that ABS (Preliminary HAZID for Emission Control Barge) and UC Irvine are performing feasibility studies in support of this rulemaking. If so, we further request that CARB advise stakeholders as to how these studies will be utilized and whether they will be available for public review and comment prior to finalization.

With regard to feasibility, constraints (including possible physical constraints) must be considered in matching up ship-shore connections. Petrochemical tank barges or tugs will not be technologically capable of utilizing shore power until proper equipment is designed, tested, and certified for use in hazardous areas and until existing safety and international standards are met. WSPA understands that while some petrochemical tank barges or tugs may already have shore

power connections installed, the existing connections may not all be set up to utilize the same voltage and could be equipped in a variety of different manners. This could result in terminal operators being required to provide multiple different cables/connection systems, depending on how the individual vessels are equipped.

Risk Assessment for DPF Retrofits

In their August 7th TWG Workshop presentation, the USCG indicated that the agency's primary concerns with diesel particulate filter (DPF) installation were related to their impact on engine performance, which affects vessel maneuverability, and potentially as another "hot surface" that could be an ignition source. WSPA requests that CARB provide any pertinent risk assessment work that has been conducted for vessels undergoing DPF retrofits, as well as any comparative evaluation of DPF installation in new builds versus retrofits.

With regard to the comments we have provided, please contact me at (310) 808-2146 or via email at rross@wspa.org if you have any questions.

Sincerely,

Cc: Tracy Haynes, CARB
Andrew Damiano, CARB
Adriana Chavez, CARB
CARB Commercial Habor Craft Team