

April 1, 2026

Chris Staats, VP Refining  
Tesoro Refining and Marketing Company LLC  
Martinez Renewable Fuels Facility  
150 Solano Way  
Martinez, California 94553

Dear Chris Staats,

Thank you for submitting the revised terminal plan (Plan) to the California Air Resources Board (CARB) on behalf of Tesoro Refining and Marketing Company LLC (Tesoro Refining). This submission was required under the Control Measure for Ocean-Going Vessels At Berth (Regulation).

**CARB staff have reviewed your submittal against the requirements in the Regulation, and have identified missing information:**

- Section 93130.14(a)(3)(H) requires 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.

The Plan referenced a DNV feasibility study and a feasibility study completed in Long Beach for land-based capture and control technology to claim a “physical and/or operational constraint” at the Martinez terminal. While the DNV study analyzed tankers and tanker terminals in California generally, it does not provide a site-specific evaluation, nor does it offer a comprehensive compliance strategy for the Martinez terminal. The Long Beach feasibility study referenced in Section 2.4 of the Plan is not site-specific to the Martinez terminal. Therefore, the Plan lacks sufficient information to claim physical or operational constraints at the Martinez terminal.

If Tesoro Refining intends to claim a physical and/or operational constraint, please resubmit the Plan with an attached site-specific feasibility study to [shorepower@arb.ca.gov](mailto:shorepower@arb.ca.gov) within 90 days of this letter. If you believe that any information in the feasibility study is a trade secret or otherwise exempt from disclosure under any provision of law, please use this form: <https://ww2.arb.ca.gov/resources/documents/berth-port-and-terminal-plan-confidentiality-disclaimer>. Tesoro Refining may also resubmit its Plan amended to pursue a different compliance strategy. Once CARB receives the re-submittal, staff will have 90 days to review it.

Physical or operational constraints identified in an approved terminal plan are one of the circumstances eligible to utilize the remediation fund option, per section 93130.15(b)(5).

If the terminal has not provided a technical feasibility study to CARB, the terminal will not be eligible to utilize the Remediation Fund option under the physical/operational constraint circumstance, though a different circumstance could apply. Additional information on the remediation fund option can be found on CARB's website at: <https://ww2.arb.ca.gov/our-work/programs/ocean-going-vessels-berth-regulation/remediation-fund>.

**There are upcoming compliance obligations that will become effective on January 1, 2027, for tanker vessels visiting your terminal.** We understand that your terminal may encounter delays while implementing emission control strategies. However, even when noted in an approved Plan, delays do not waive, exempt, or otherwise excuse compliance obligations. Terminals must meet the Regulation requirements for reducing emissions at berth or use an alternative compliance option consistent with the compliance start dates in the Regulation.

Terminals that plan to use barge-based capture-and-control systems have a responsibility to engage with barge providers and ensure that the system(s) will satisfy their compliance obligations and any individual needs. This may include working with barge providers to perform necessary testing as part of the CARB approval process or otherwise collaborating with barge providers who are scaling up their operations.

If any significant changes occur to any elements of your Plan, you may email an updated Plan to [shorepower@arb.ca.gov](mailto:shorepower@arb.ca.gov) at any time. Additional information on terminal plans can be found under section 93130.14 of the Regulation or on CARB's website at: <https://ww2.arb.ca.gov/our-work/programs/ocean-going-vessels-berth-regulation/terminal-and-port-plan-submissions>.

Sincerely,



Bonnie Soriano, Chief, Freight Activity Branch, Transportation and Toxics Division



Justin Shields, Chief, Freight Hub Enforcement Branch, Enforcement Division

cc: Katie Rodriguez, Environmental Engineer, Martinez Renewable Fuels Facility

Angela Csondes, Section Manager, Marine Strategies Section, Transportation and Toxics Division