

June 12, 2026

Devon Maheshwari
Martinez Refining Company LLC
3495 Pacheco Boulevard
Martinez, California 94553
Devon.Maheshwari@pbfenergy.com

Dear Devon Maheshwari,

Thank you for submitting the revised terminal plan (Plan) to the California Air Resources Board (CARB) on behalf of the Martinez Refining Company (MRC) Marine Oil Terminal. The Plan was required by section 93130.14 of the Control Measure for Ocean-Going Vessels At Berth¹ (Regulation).

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

1. Section 93130.14(a)(3)(A) of the Regulation requires the terminal operator to provide an identification and description of all necessary equipment, including whether it will be located on the vessel, wharf, shore, or elsewhere.
2. Section 93130.14(a)(3)(B) of the Regulation requires the terminal operator to provide the number of vessels expected to visit the terminal using the strategy.
3. Section 93130.14(a)(3)(C) of the Regulation requires the terminal operator to provide a list of each berth with geographic boundary coordinates.
4. Section 93130.14(a)(3)(D) of the Regulation requires the terminal operator to identify berth(s) where equipment will be used;
5. Section 93130.14(a)(3)(F) of the Regulation requires the terminal operator to provide a schedule for installing equipment.

The Plan consisted of a technical feasibility study conducted by a third-party engineering firm. This study is site-specific and identifies potential physical and/or operational constraints which may be relevant for seeking use of the remediation fund under Section 93130.15(b)(5) of the Regulation. However, this study does not discuss what emission control strategy MRC is planning to implement at its terminal. As a result, it is missing many of the required elements of a terminal plan, which are listed above. Please resubmit the Plan with this information to shorepower@arb.ca.gov within 90 days of this letter. Once CARB receives the re-submittal, staff will have 90 days to review it.

A physical and/or operational constraint delaying the implementation of a CARB approved emission control strategy is one of the circumstances eligible to utilize the remediation fund option. Per section 93130.15(b)(5) of the Regulation, the physical/operational

constraint must be identified in a terminal plan that CARB has deemed acceptable. If CARB does not deem MRC's terminal plan acceptable, 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 to ensure consistency with their operations.

If any significant changes occur to any elements of your Plan, you may email an updated Plan to 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/ourwork/programs/oceangoingvesselsberthregulation/terminalandportplansubmissions>.

Sincerely,



Tracy Haynes, Chief, Freight Activity Branch, Transportation and Toxics Division



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

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

Rina Mansingh, Manager, Environmental Department, Martinez Refining Company LLC, Rina.Mansingh@pbfenergy.com