Shore Terminals LLC dba Sunoco LP
At-Berth Terminal Plan

This document has been prepared pursuant of 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 Tanker Terminal.

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Section 1: General Information

Scope

This At-Berth Terminal Plan applies to ocean-going tanker vessels subject to the At-Berth Regulation while berthed at the Shore-Selby Dock (ROD8). The Plan addresses emissions from auxiliary diesel engines operated during at-berth operations and describes the compliance strategy selected by Shore Terminals LLC to meet applicable regulatory requirements.

Terminal Contact

Christopher Vratil

Phone Number: (361) 906-7454

Email: chris.vratil@sunoco.com

Terminal Berth covered by this plan

Berth Name	Approximate Geographic Boundary Coordinates
Shore-Selby Dock (ROD8)	38° 03' 30'' N; 122° 14’ 40” W

Updated – October 12, 2026

Section 2: Strategy Details

Strategy used to comply with the requirements for Ocean-going vessels visiting the terminal

Based on an evaluation of available CARB approved Emission Control Strategy (CAECS) technologies – including shore power, shore-based capture and control (C&C) systems, and barge-based systems – Shore Terminals LLC has identified a **barge-based capture and control (C&C) system** as the earliest deployable and most feasible near-term compliance pathway for the Shore-Selby Dock.

Shore Terminals LLC is currently engaging with CARB approved vendors, STAX Engineering and Clean Air Engineering Maritime (CAEM). Vendor selection will be evaluated on demonstrated technical capability, operational compatibility with site-specific conditions, and ability to meet required deployment timelines. Upon selection of vendor(s), Shore Terminals LLC's customers will enter the contractual obligations based on their operational and vessel-specific requirements.

Anticipated use of strategy

- Expected number of vessels (annual): 20 (50*)
- Expected number of vessel visits (annual): 20 (50*)
- Berth where equipment will be used: Shore-Selby Dock (ROD8)

**Pending verification of federal contractor exemption claims for military-contracted vessels*

Equipment and System Description

The barge-based C&C system will be designed to capture and control auxiliary engine exhaust emissions during at-berth operations in accordance with CARB performance requirements. While the final configuration will be determined during vendor selection and certification, the system is expected to include the following components:

- Exhaust capture interfaces (e.g., hoods, articulated arms, hoses)
- Vapor transfer equipment (e.g., blowers, manifolds, safety interlocks)
- Emission control technologies (e.g., filtration, adsorption, or scrubbing)
- Associated power generation, monitoring, and safety systems.

Implementation Schedule

Shore Terminals LLC will establish a milestone-based implementation schedule to support timely deployment of the selected barge-based C&C system. As no permanent fixed infrastructure is required at the terminal, the schedule will focus on key milestones as identified below:

Milestone	**Target Date**
Vendor(s) selection	Completed

Contract Execution	12/31/2026 (In progress)
System certification based on site-specific conditions (Internal Feasibility Assessment)	Completed
Equipment fabrication and availability (CAECS deployment trial and testing)	11/30/2026
Commencement of compliant operations	30 days from the deployment trial

Target commencement of Operations: January 1, 2027

Section 3: Terminal-specific berthing restrictions

Operations at the Shore-Selby Dock are subject to the existing Marine Terminal Operating Limits (TOLs), Dock Operating Manual (DOM), and all applicable federal, state, and local regulatory requirements. Specific considerations include:

- Tidal and river flow conditions,
- Vessel dimension, vessel class compatibility, and
- Marine traffic and navigational constraints

For barge-based C&C system operations, the CAECS barge will be positioned and operated outside the ocean-going vessel's hazardous zone, as defined by applicable safety and marine regulations. Shore Terminals LLC, in coordination with the selected service provider, will evaluate any limitations related to barge positioning, simultaneous operations, and integration with cargo transfer activities. Any identified restrictions will be incorporated into terminal operating procedures and vessel scheduling, as applicable.

Section 4: Division of Roles and Responsibilities

Division of responsibilities for enacting the infrastructure required by the terminal's plan:

Terminal Operator (Shore Terminals LLC)

- Ensuring terminal operations support compliant deployment of the barge-based C&C system.
- Review barge-based C&C system location to confirm that it will not impact navigation.
- Provide equipment or necessary infrastructure at Shore-Selby Dock as negotiated by the parties.
- Evaluate TOLs, DOM and vessel pre-approval process as needed.

Customers

- Ensure vessel participation and operational compatibility with the Shore-Selby Dock.

- Execute service agreements with the selected barge-based C&C vendor(s) and Shore Terminals LLC.

Barge Based C&C Vendor

- Design, fabricate, and operate a CARB-compliant system.
- Obtain required approvals (e.g. CARB certification, USCG approvals, meeting hazard classifications, MTSA/Security considerations)
- Make the system available for use at the Shore-Selby Dock.

Contractual and Contingency provisions

- Shore Terminals LLC anticipates that at least one provider will complete tanker testing by the fourth quarter of 2026, with CARB approval targeted for late-2026. Final vendor selection and contract execution will support equipment availability by January 1, 2027.
- In the event that a CARB-approved barge-based C&C system meets the operational constraints of Shore-Selby Dock is not available by the compliance date, Shore Terminals LLC may seek CARB authorization to utilize the remediation fund.

Section 5: Signature of Terminal Operator

By signing below, the Terminal Operator's responsible officer confirms under penalty of perjury that he/she reviewed this At-Berth Terminal Plan and is submitting this At-Berth Terminal Plan as Shore Terminals LLC's compliance strategy for the At-Berth Regulation. Shore Terminals LLC understands this plan is subject to verification by CARB staff.

Name: Christopher Vratil Title: Sr. Director, Terminal Operations

Signature:  Date: 12 Oct 2026