



**Torrance Refining Company LLC**  
 3700 W 190<sup>th</sup> Street  
 Torrance, CA 90504  
[www.torrancerefinery.com](http://www.torrancerefinery.com)

October 6, 2020

**VIA E-MAIL AND OVERNIGHT MAIL**

Wayne Natri  
 Executive Officer  
 South Coast Air Quality Management District  
 21865 Copley Drive  
 Diamond Bar, CA 91765

**Subject: *Torrance Refining Company LLC Proffer Letter Commitments Quarterly Update***

Dear Mr. Natri,

On behalf of Torrance Refining Company LLC (“TORC”), consistent with our November 25, 2019 letter, and as requested by you in your November 15, 2019 letter, below is the third quarter 2020 update regarding the voluntary modified hydrogen fluoride (“MHF”) alkylation unit safety enhancement commitments and control measures as proffered in TORC’s August 30, 2019 Proffer Letter accepted and approved on September 6, 2019 by the South Coast Air Quality Management District (“South Coast AQMD”) Governing Board pursuant to Board Resolution No. 19-19 (the “Proffer Letter”). Capitalized terms used in this letter and not otherwise defined shall have the meanings ascribed in the Proffer Letter.

The quarterly update below provides the current status of the design, purchase, installation, testing, and operational start date of the proffered safety enhancements. As previously disclosed in the second quarter 2020 update, due to COVID-19 impacts, the MHF alkylation unit turnaround has now been moved to 2022 along with the Fluid Catalytic Cracker turnaround. Although the ongoing impact of COVID-19 remains uncertain, as noted in the table below, the safety enhancements are still currently on schedule to be completed by the end of 2021.

<b>Safety Enhancements</b>	<b>Third Quarter 2020 Status</b>
Settler Area Protective Steel Structure  Northern Water Mitigation Monitors  Fluidized Catalytic Cracking Unit (FCCU) Electrostatic Precipitator (ESP) Over Pressure Mitigation	<ul style="list-style-type: none"> <li>• Funding approved for Detailed Engineering and Procurement</li> <li>• Detailed Engineering in progress</li> <li>• Underground verifications for piping and electrical design in progress</li> <li>• Completed underground verifications for foundation design</li> <li>• Enhancement currently on schedule for implementation in 2021</li> </ul>

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Safety Enhancements	Third Quarter 2020 Status
Settler Area Water Mitigation Dome and Curtain  Settler Area Enhanced HF/MHF Detection System	<ul style="list-style-type: none"><li>• Funding approved for Detailed Engineering and Procurement</li><li>• Detailed Engineering in progress</li><li>• Underground verifications for piping and electrical design in progress</li><li>• Completed underground verifications for foundation design</li><li>• Enhancement currently on schedule for implementation in 2021</li></ul>

TORC will continue to closely monitor the Engineering, Construction, and Materials availability in connection with the COVID-19 pandemic, and will notify the South Coast AQMD of any additional impacts that could result in further schedule delays.

If you have any questions or require any additional information regarding this quarterly update of the safety enhancements, please do not hesitate to contact me at (310) 212-4500.

Sincerely,



Steve Steach  
Refinery Manager

cc: Paul Davis, President, Western Region  
Trecia Canty, Senior Vice President & General Counsel  
Darren Stroud, Refinery Attorney  
Jill Whynot, South Coast AQMD  
Philip Fine, South Coast AQMD  
Susan Nakamura, South Coast AQMD  
Barbara Baird, South Coast AQMD  
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