



**Torrance Refining Company LLC**  
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Torrance, CA 90504  
[www.torrancerefinery.com](http://www.torrancerefinery.com)

August 30, 2021

***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 second quarter 2021 update regarding the voluntary modified hydrogen fluoride (“MHF”) alkylation unit safety enhancement commitments and control measures as proffered 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.

Attached as Annex A is a summary of the current status of the design, purchase, installation, testing, and operational start date of the proffered safety enhancements as of the second quarter 2021. We provide additional detail regarding the status of the enhancements below. Also, attached is Annex B, which are design diagrams and photographs of the progress we have made during the recent July 2021 Torrance Refinery turnaround (“Turnaround”).

**Settler Area Protective Steel Structure, Northern Water Mitigation Monitors, and Fluidized Catalytic Cracking Unit (“FCCU”) Electrostatic Precipitator (“ESP”) Over Pressure Mitigation**

With respect to the Settler Area Protective Steel Structure and Northern Water Mitigation Monitors enhancements, TORC has completed detailed engineering and procurement. All long lead materials including elevated water monitors with water supply on/off valve, control panel assemblies, and control valves for area revamp work have been received.

The building plans for the protective steel structure and water mitigation monitors have been approved by City of Torrance permitting department (“City”), and the contractors hired by TORC to complete this work, pulled the plan permits in March 2021.

The construction work packages for the protective steel structure and the water mitigation monitors safety enhancements have been completed. As a result, as shown in Annex B, during July 2021, construction

has progressed under the building permits as approved by the City during the Turnaround. Specifically, the new protective steel structure, all foundations have been set, and all structural columns, beams, bracing and roof panels have been erected. Additionally, new northern firewater monitor has been installed and tested, and two other new area perimeter firewater monitors are nearing construction completion.

With respect to the FCCU ESP Over Pressure Mitigation enhancement, TORC has completed detailed engineering and is in the process of procuring the necessary materials for this safety enhancement.

Additionally, TORC has received approved funding to complete construction of this safety enhancement. The construction work package for this safety enhancement has been completed. As a result, construction planning is progressing for this safety enhancement.

Notwithstanding the impact of the COVID-19 pandemic on the current economic environment, TORC's 2021 planned budget continues to include the amounts required to be expended with respect to the remaining costs of these enhancements. At this time, TORC believes these enhancements are on schedule for implementation in 2021.

#### **Settler Area Water Mitigation Dome and Curtain**

With respect to the Settler Area Water Mitigation Dome and Curtain enhancements, TORC has completed detailed engineering and procurement. All long lead materials including dome water monitors, spray curtain headers with nozzles, water supply on/off valve, and control panel assemblies have been received.

The construction work packages for the water mitigation dome and curtain were finalized in March 2021. As a result, as shown in Annex B, during July 2021, construction has progressed under the building permits as approved by the City during the Turnaround. Specifically, the new water mitigation dome monitors and spray curtains have been installed and tested and are in the process of being fully commissioned.

Notwithstanding the impact of the COVID-19 pandemic on the current economic environment, TORC's 2021 planned budget includes the amounts required to be expended with respect to the remaining costs of these enhancements. At this time, TORC believes these enhancements are on schedule for implementation in 2021.

#### **Settler Area Enhanced HF/MHF Detection System**

With respect to the Settler Area Enhanced HF/MHF Detection System enhancements, TORC has completed detailed engineering and procurement. All long lead materials including hydrogen fluoride detection instrumentation and Programmable Logic Controller (PLC) have been received.

The construction work packages for the enhanced HF/MHF detection system were finalized in March 2021. As a result, as shown in Annex B, during July 2021, construction has progressed under the building permits as approved by the City during the Turnaround. Specifically, the new HF/MHF detection systems have been installed and tested and are in the process of being fully commissioned.

Notwithstanding the impact of the COVID-19 pandemic on the current economic environment, TORC's 2021 planned budget continues to include the amounts required to be expended with respect to the remaining costs of these enhancements. At this time, TORC believes these enhancements are on schedule for implementation in 2021.

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As we have previously reported, due to COVID-19 pandemic impacts, the MHF Alkylation Unit turnaround has been moved to 2022, along with the FCCU turnaround, however, as noted above, the safety enhancements are still on schedule to be completed by the end of 2021.

TORC will continue to closely monitor Engineering, Construction, and Materials availability in connection with the COVID-19 pandemic and will notify 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, West Coast Refinery Attorney  
Jill Whynot, South Coast AQMD  
Sarah Rees, South Coast AQMD  
Susan Nakamura, South Coast AQMD  
Barbara Baird, South Coast AQMD  
Daphne Hsu, South Coast AQMD  
Michael Krause, South Coast AQMD

## ANNEX A

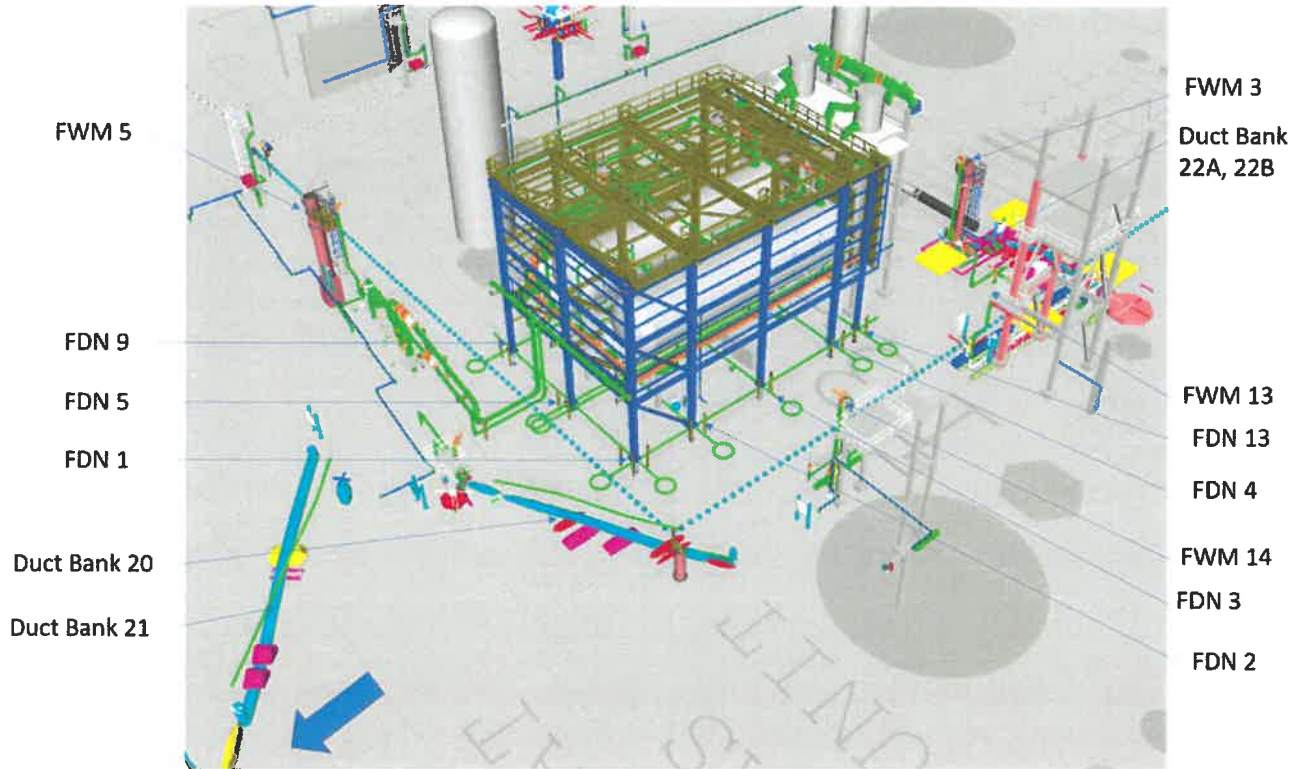
Safety Enhancements	Second Quarter 2021 Status
<p>Settler Area Protective Steel Structure</p> <p>Northern Water Mitigation Monitors</p> <p>Fluidized Catalytic Cracking Unit (FCCU) Electrostatic Precipitator (ESP) Over Pressure Mitigation</p>	<p><u>Settler Area Protective Steel Structure and Northern Water Mitigation Monitors</u></p> <ul style="list-style-type: none"> <li>• Funding approved for Detailed Engineering and Procurement</li> <li>• Funding approved for Construction of Settler Area Protective Steel Structure and Northern Water Mitigation Monitors</li> <li>• Detailed Engineering has been completed</li> <li>• Construction continues for Settler Area Protective Steel Structure and Northern Water Mitigation Monitors</li> <li>• All long lead materials have been received</li> <li>• Building plans approved by City of Torrance permitting department</li> <li>• Enhancements currently on schedule for implementation in 2021</li> </ul> <p><u>Fluidized Catalytic Cracking Unit (FCCU) Electrostatic Precipitator (ESP) Over Pressure Mitigation</u></p> <ul style="list-style-type: none"> <li>• Funding approved for Detailed Engineering and Procurement and Construction</li> <li>• Detailed Engineering has been completed</li> <li>• Construction planning progressing for FCCU ESP Overpressure Mitigation</li> <li>• All long lead materials have been ordered and are planned to be delivered onsite by third or fourth quarter 2021</li> <li>• Enhancements currently on schedule for implementation in 2021</li> </ul>
<p>Settler Area Water Mitigation Dome and Curtain</p>	<ul style="list-style-type: none"> <li>• Funding approved for Detailed Engineering and Procurement, and Construction</li> <li>• Detailed Engineering has been completed</li> <li>• Construction continues for these safety enhancements</li> <li>• All long lead materials have been received</li> <li>• Enhancements currently on schedule for implementation in 2021</li> </ul>

## ANNEX A

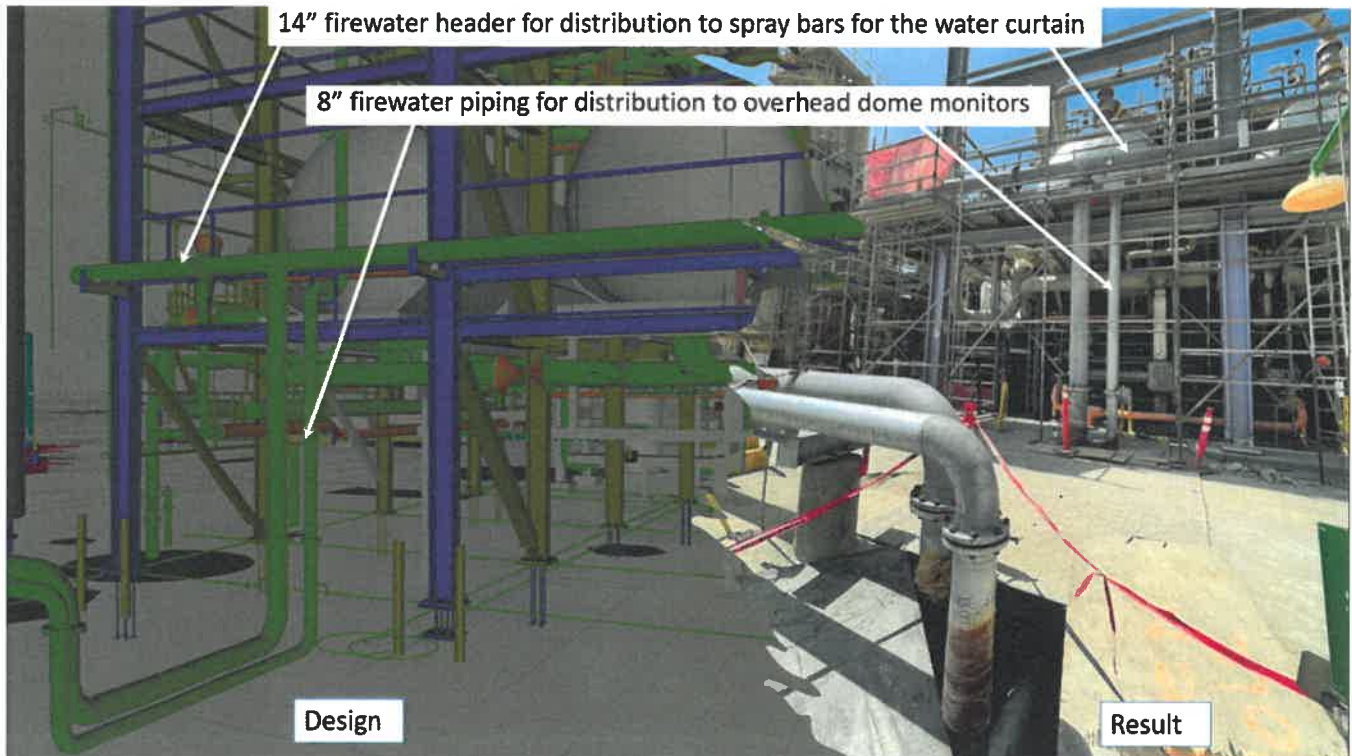
<b>Safety Enhancements</b>	<b>Second Quarter 2021 Status</b>
Settler Area Enhanced HF/MHF Detection System	<ul style="list-style-type: none"><li>• Funding approved for Detailed Engineering and Procurement, and Construction</li><li>• Detailed Engineering has been completed</li><li>• Construction work packages were finalized in March 2021</li><li>• Construction continues for these safety enhancements</li><li>• All long lead materials have been received</li><li>• Enhancements currently on schedule for implementation in 2021</li></ul>

# ANNEX B

## Design Model and Construction Diagram



FMW = Firewater monitor (and number)  
FDN = Foundation (and number)  
Duct Bank = underground electrical duct bank (and number)



# ANNEX B

## Structure North Wall View



## ANNEX B

Structure Prior to Setting Roof Panels – Four New Overhead Dome Monitors shown



Structure with Roof Panels Set





## ANNEX B

### New Northern Firewater Monitor (FMW #5)



### New Northern Firewater Monitor (FMW #5) – Flow Test

