



Torrance Refining Company LLC
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Torrance, CA 90504
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February 11, 2022

VIA E-MAIL AND OVERNIGHT MAIL

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

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

Dear Mr. Nastri,

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 fourth quarter 2021, and final, 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 final status of the design, purchase, installation, testing, and implementation of the proffered safety enhancements as of the fourth quarter 2021. We provide additional detail regarding the final status of the enhancements below. Also, attached is Annex B, which are photographs of the progress of the enhancements since the July 2021 Torrance Refinery turnaround.

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

For the new protective steel structure:

- All foundations are set;
- All structural columns, beams, and bracing are erected;
- All side steel panels are installed; and
- The steel girts and platform modifications are completed.

See Annex B.

Regarding the water monitors, the new northern firewater monitor and the other two new area perimeter firewater monitors are installed, tested, and commissioned. See Annex B.

With respect to the FCCU ESP Over Pressure Mitigation enhancement, this safety enhancement is completed. See Annex B.

TORC completed these safety enhancements in 2021 as planned.

Settler Area Water Mitigation Dome and Curtain

The new water mitigation dome monitors and spray curtains are installed, tested, and commissioned. See Annex B.

TORC completed these safety enhancements in 2021 as planned.

Settler Area Enhanced HF/MHF Detection System

The new HF/MHF detection systems are installed, tested, and commissioned. See Annex B.

TORC completed these safety enhancements in 2021 as planned.

* * *

In conclusion, TORC has successfully completed all the voluntary MHF alkylation unit safety enhancements in year 2021. As a result, TORC has met all its commitments and obligations under the Proffer Letter.

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

Sincerely,



Jerry Forstell
Refinery Manager

cc: Paul Davis, President, Western Region
Trecia Canty, Senior Vice President & General Counsel
Steve Steach, Senior Vice President, Head of Refining
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

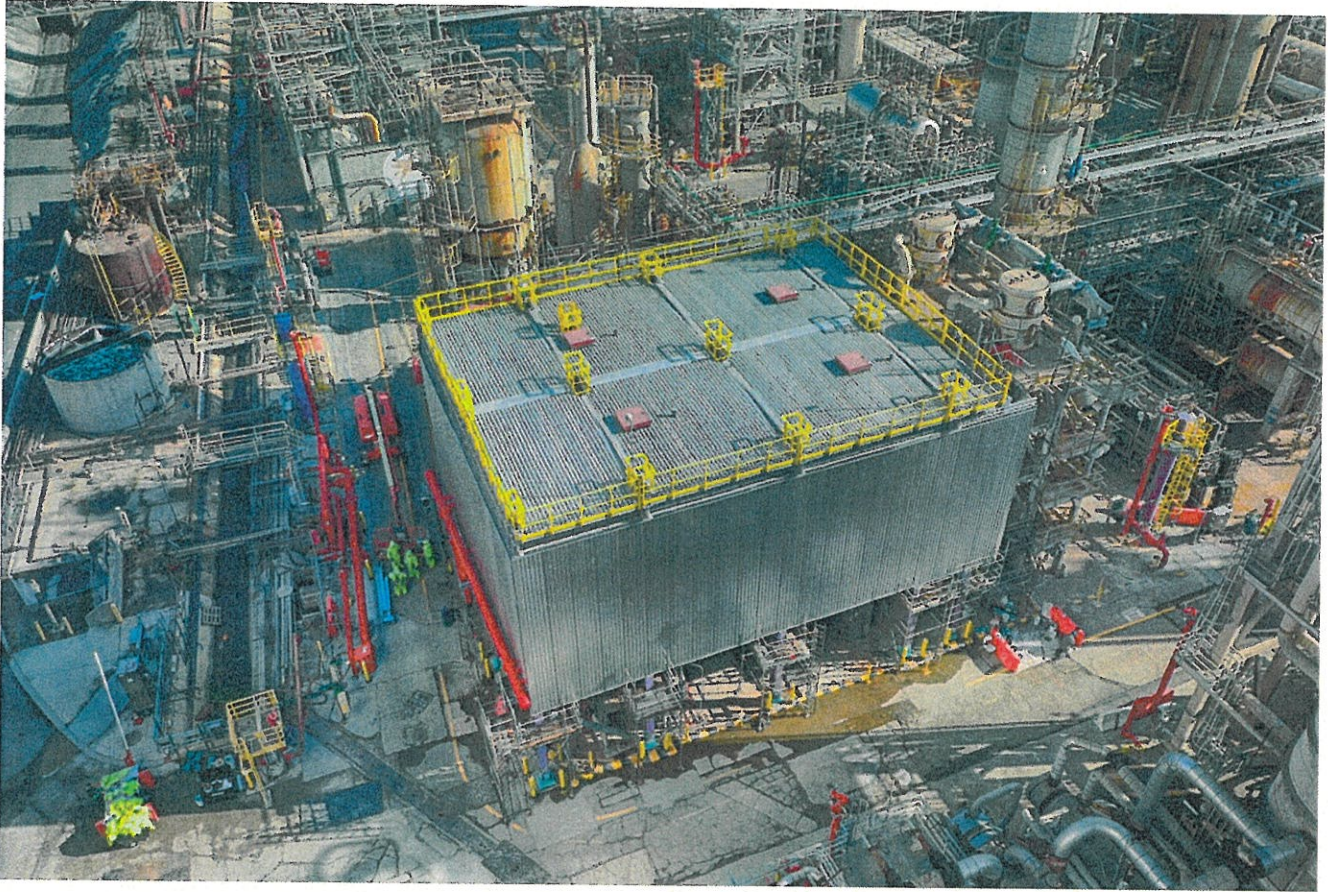
| Safety Enhancements | Fourth Quarter 2021 and Final Status |
|--|--|
| <p>Settler Area Protective Steel Structure</p> <p>Northern Water Mitigation Monitors</p> <p>Fluidized Catalytic Cracking Unit (FCCU) Electrostatic Precipitator (ESP) Over Pressure Mitigation</p> | <p><u>Settler Area Protective Steel Structure and Northern Water Mitigation Monitors</u></p> <ul style="list-style-type: none"> • Funding approved for Detailed Engineering and Procurement • Funding approved for Construction of Settler Area Protective Steel Structure and Northern Water Mitigation Monitors • Detailed Engineering completed • All long lead materials received • Building plans approved by City of Torrance permitting department • Construction completed for Settler Area Protective Steel Structure • Northern Water Mitigation Monitors installed, tested, and commissioned • Enhancements implemented in 2021 <p><u>Fluidized Catalytic Cracking Unit (FCCU) Electrostatic Precipitator (ESP) Over Pressure Mitigation</u></p> <ul style="list-style-type: none"> • Funding approved for Detailed Engineering and Procurement and Construction • Detailed Engineering completed • All long lead materials ordered and received • Construction completed for FCCU ESP Overpressure Mitigation • Enhancement implemented in 2021 |
| <p>Settler Area Water Mitigation Dome and Curtain</p> | <ul style="list-style-type: none"> • Funding approved for Detailed Engineering and Procurement, and Construction • Detailed Engineering completed • All long lead materials received • Construction of water mitigation dome monitors and spray curtains installed, tested, and commissioned • Enhancements implemented in 2021 |

ANNEX A

| Safety Enhancements | Fourth Quarter 2021 Status |
|---|---|
| Settler Area Enhanced HF/MHF Detection System | <ul style="list-style-type: none">• Funding approved for Detailed Engineering and Procurement, and Construction• Detailed Engineering completed• Construction work packages finalized• All long lead materials received• Construction of settler area enhanced HF/MHF detection system installed, tested, and commissioned• Enhancements implemented in 2021 |

ANNEX B

Overall Protective Structure and Area Firewater Monitors Completed



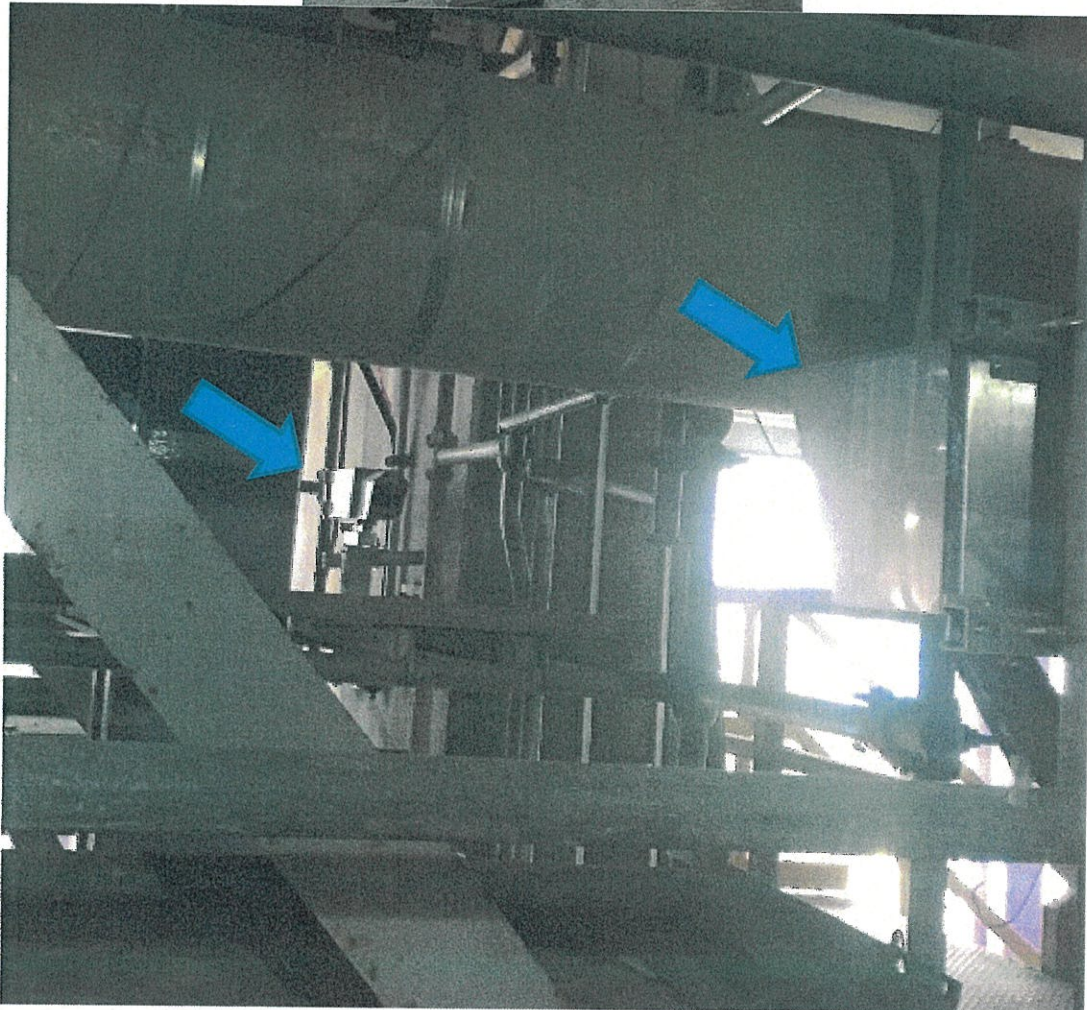
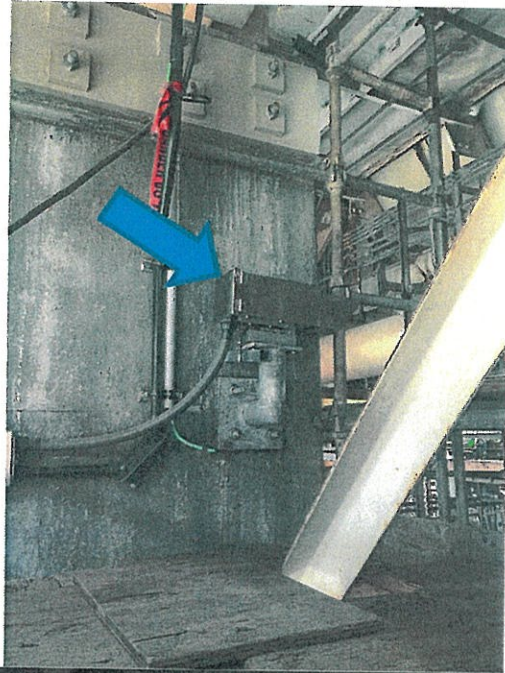
ANNEX B

New Northern Firewater Monitor Flow Test



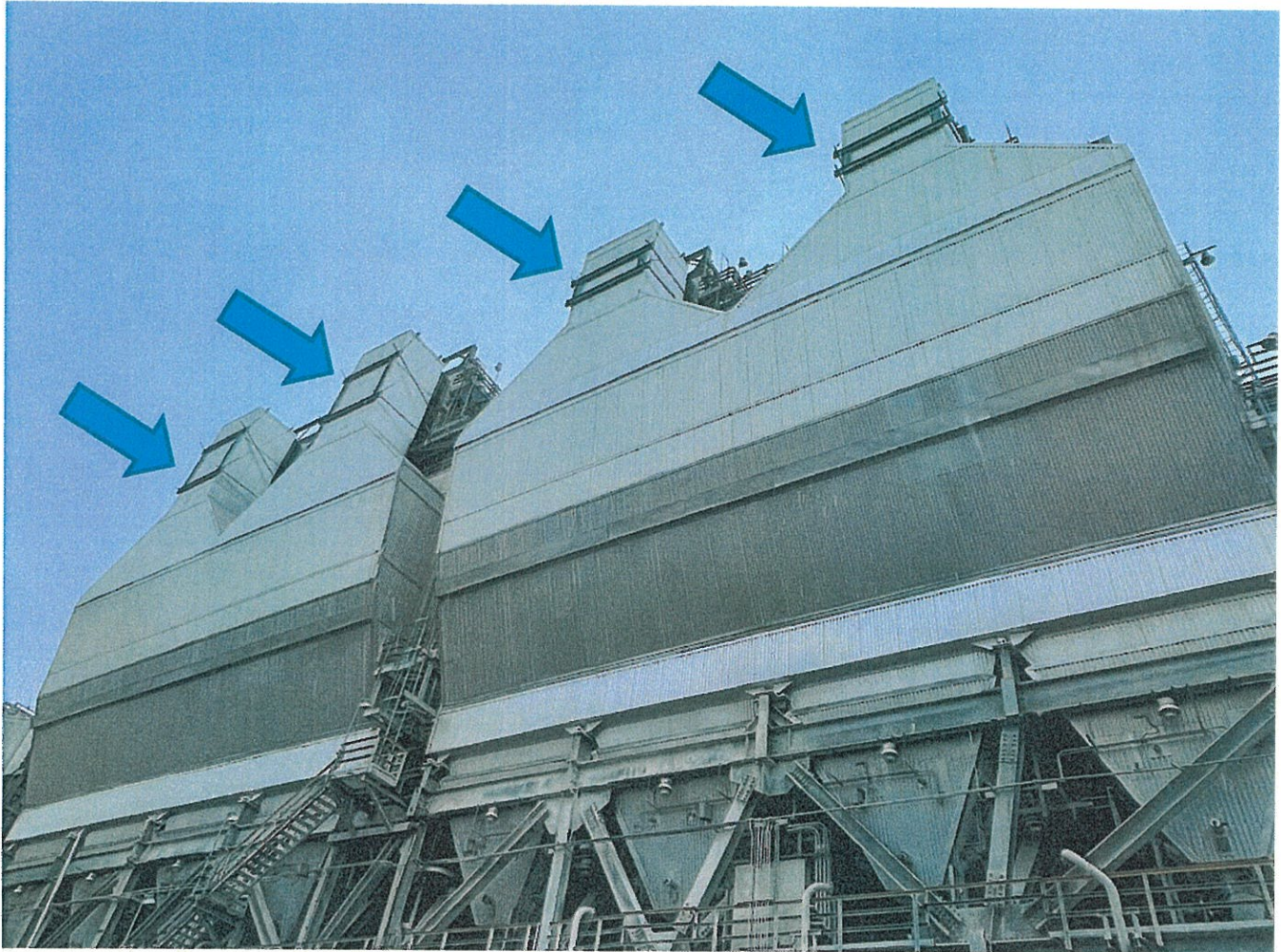
ANNEX B

Examples of New Enhanced HF Detection



ANNEX B

FCCU ESP Over Pressure Mitigation Enhancement Completed



ANNEX B

Dome Monitor and Spray Curtain – Flow Test (Before Side Panels Installed)

