



Torrance Refining Company LLC
3700 West 190th Street
Torrance, California 90504
www.torrancerefinery.com

CERTIFIED MAIL

March 26, 2019

Dr. Andrea Polidori
Advanced Monitoring Technologies Manager
South Coast Air Quality Management District
21865 East Copley Drive
Diamond Bar, CA 91765

Rule 1180 Fenceline Monitoring Plan Partial Approval

Torrance Refining Company, Facility ID 181667

Dear Dr. Polidori:

Attached, please find the signed partial approval certification by the HSE Manager, David Ingram to accept the conditions of the partial approval of the Torrance Refining Company Plan.

If you have any questions, please feel free to contact me at craig.sakamoto@pbfenergy.com or 310-212-1884.

Sincerely,

A handwritten signature in blue ink, appearing to be "Craig Sakamoto", with a long horizontal line extending to the right.

Craig Sakamoto, PE
Regulatory Strategist
Torrance Refining Company, LLC

Attachment



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

Office of the Executive Officer
Wayne Nastri
909.396.2100, fax 909.396.3340

Via email and US Mail

March 19, 2019

Craig Sakamoto, P.E.
Torrance Refining Company, LLC
3700 West 190th Street
Torrance CA 90504

**SCAQMD Partial Approval of the Fenceline Monitoring Plan for the Torrance Refining
Company (Facility ID 181667)
SCAQMD Rule 1180**

On August 1, 2018, the Torrance Refining Company, LLC (TORC), submitted to the South Coast Air Quality Management District (SCAQMD) a fenceline air monitoring plan pursuant to SCAQMD Rule 1180, and as required by the Health and Safety Code section 42705.6. SCAQMD staff had reviewed the plan and provided the refinery with comments. On November 30, 2018 TORC submitted a revised draft fenceline air monitoring plan (Plan) which was published for public comment on December 07, 2018. The public comment period closed on January 11, 2019. SCAQMD is pleased to inform you that sections 2 through 6.6 of TORC's Plan have been approved, provided that TORC agrees to the additions and modifications outlined below and shown in Exhibit A:

1. Include two (2) additional sets of point monitors, each comprised of a hydrogen sulfide (H₂S) instrument and black carbon (BC) instrument. With this addition, a total of six (6) H₂S and six (6) BC point monitor sets (each comprised of a H₂S instrument and BC instrument) will be installed at the refinery fenceline. The locations of these monitors are outlined in the attached Exhibit A.
2. Unless an agreement is reached between TORC and Sonoma Technology Inc. (STI) for continuing to operate the fenceline monitoring system that is currently part of the Supplemental Environmental Project (SEP) at TORC, submit a revised plan for SCAQMD review to replace the monitoring equipment operated by STI with an equal or higher number of LP-DOAS and OP-FTIR instruments to satisfy the requirements of Rule 1180, and implement the revised plan without interruption of fenceline monitoring.

SCAQMD will continue to work with TORC to finalize and approve the remaining elements of the Plan (namely, Section 6.7 – Alternative/Back-up Monitoring Systems; Section 7 – Data Presentation to the Public; Section 8 – Public Outreach Program; and Section 9 – Quality Assurance Project Plan). The SCAQMD intends that all elements of the Plan will be in operation by the January 1, 2020 deadline in Health and Safety Code section 42705.6 for the fenceline air monitoring system.

Please have your authorized person sign in the space allocated below to agree with the conditions put forward in this letter, and return the signed copy to SCAQMD within fourteen (14) days from the date of this letter. In accordance with Rule 1180, TORC must commence fenceline air monitoring no later than one year from the date of Plan approval, and Health and Safety Code section 42705.6 requires installation and operation by January 1, 2020. Your partial approval will become effective on the date of TORC’s signed certification below.

TORC certification:

I understand, accept, and agree to the conditions of the partial approval of the Torrance Refining Company Plan.

DHS
Name of Authorized Person

HSE Manager
Position

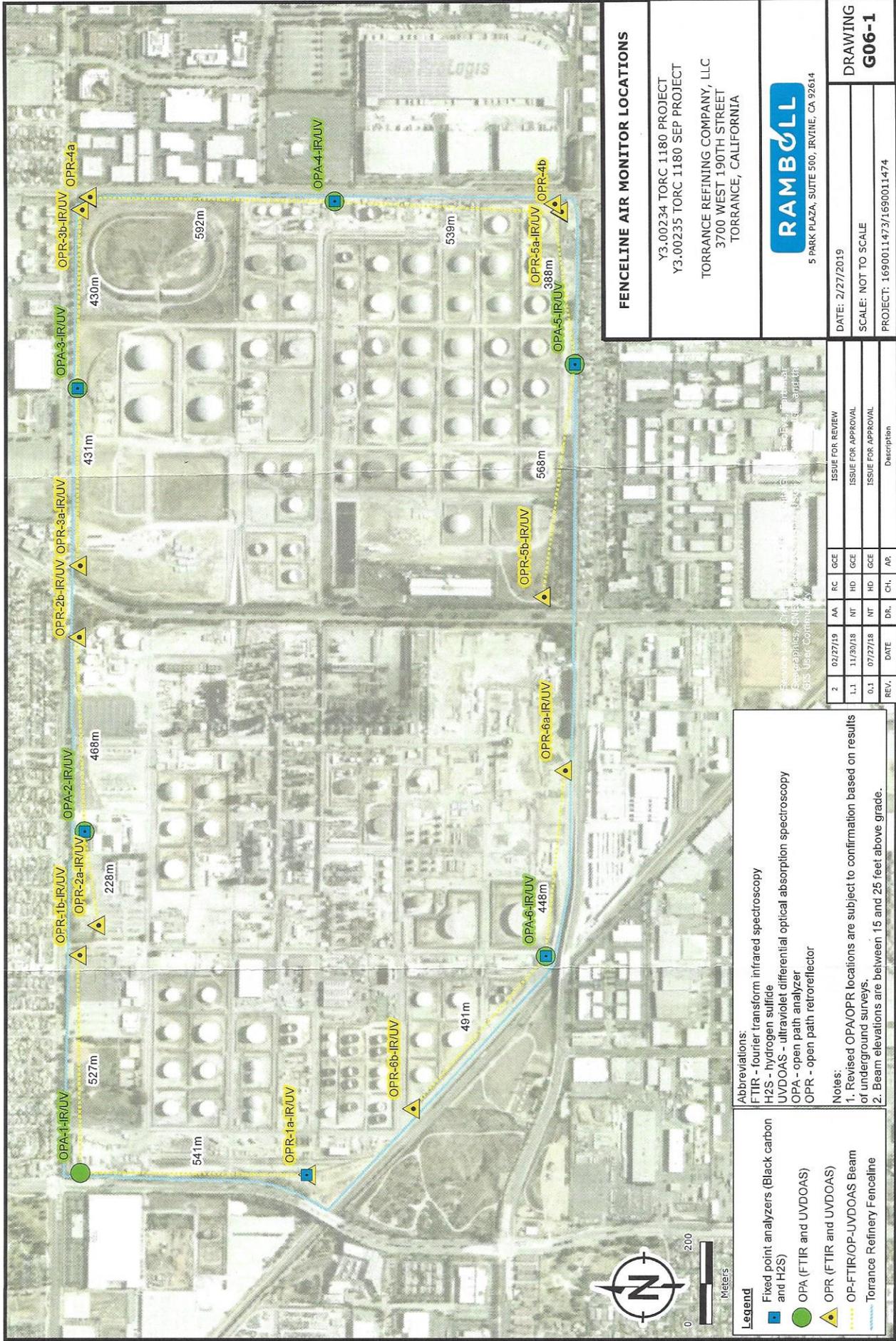
3/26/19
Date

Should you have any questions regarding this approval letter, please contact Dr. Andrea Polidori at (909) 396-3283, or via email at apolidori@aqmd.gov.

Sincerely,

Wayne Nasti,
Executive Officer
South Coast Air Quality Management District

Exhibit A - TORC



FENCELINE AIR MONITOR LOCATIONS

Y3-00234 TORC 1180 PROJECT
 Y3-00235 TORC 1180 SEP PROJECT
 TORRANCE REFINING COMPANY, LLC
 3700 WEST 190TH STREET
 TORRANCE, CALIFORNIA



5 PARK PLAZA, SUITE 500, IRVINE, CA 92614

DATE: 2/27/2019	DRAWING
SCALE: NOT TO SCALE	G06-1
PROJECT: 1690011473/1690011474	

REV.	DATE	DL	CH	AC	DESCRIPTION
2	02/27/19	AA	RC	GCE	ISSUE FOR REVIEW
1.1	11/20/18	NT	HD	GCE	ISSUE FOR APPROVAL
0.1	07/27/18	NT	HD	GCE	ISSUE FOR APPROVAL

Abbreviations:
 FTIR - fourier transform infrared spectroscopy
 H2S - hydrogen sulfide
 UVDOAS - ultraviolet differential optical absorption spectroscopy
 OPA - open path analyzer
 OPR - open path retroreflector

Notes:
 1. Revised OPA/OPR locations are subject to confirmation based on results of underground surveys.
 2. Beam elevations are between 15 and 25 feet above grade.

- Legend**
- Fixed point analyzers (Black carbon and H2S)
 - OPA (FTIR and UVDOAS)
 - OPR (FTIR and UVDOAS)
 - OP-FTIR/OP-UVDOAS Beam Torrance Refinery Fenceline

