



**Torrance Refining
Company LLC**
3700 W. 190th Street
Torrance, CA 90504
www.pbfenergy.com

August 4, 2021

VIA E-MAIL: srees@aqmd.gov

Sarah Rees, Ph.D.
Deputy Executive Officer
Planning, Rule Development & Area Sources
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765

Re: Comments on South Coast Air Quality Management District Staff's 1109.1 Proposed Rule Emissions of Oxides of Nitrogen from Petroleum Refineries and Related Industries Revised Rule Language Revision 3 Released to the Public on Wednesday, July 21, 2021

Dear Dr. Rees;

Torrance Refining Company LLC ("TORC") is pleased to submit comments to the South Coast Air Quality Management District ("District") in response to staff's Proposed Rule 1109.1 Emissions of Oxides of Nitrogen from Petroleum Refineries and Related Industries ("PR 1109.1") revised rule language released on July 21, 2021 ("Revised July 2021 Language"). This supplements TORC's previous comment letters submitted to the District on November 20, 2020, December 14, 2020, January 27, 2021, two letters on April 16, 2021 and June 21, 2021 and ongoing discussions with District Staff.

Schedule

In the Revised July 2021 Language, the District only includes two I-Plan options in 1109.1(e) Table 4 for submitting permit applications for air pollution controls to meet the proposed Best Available Retrofit Control Technology ("BARCT") limits proposed in PR 1109.1 (d) Table 1, Table 2. While the District has provided for extensions in PR 1109.1(c)(4)(A) to the I-Plan submittal dates, the District has not fully considered long cycle turnarounds, and thus, not provided enough options that will allow impacted refineries to comply without creating potentially significant regional supply disruptions. TORC recommends that the District continue to meet with impacted refineries to produce effective I-Plan schedule options that will enable compliance without significant risk of harm to the broader regional economy.

Near Limits

The Revised July 2021 Language under PR 1109.1(e)(2) and (f)(1) requires that the I-Plan and B-Plan must be submitted for approval by July 1, 2022. In addition, PR 1109.1(d)(6)(C) requires that the Near Limits in Table 2 are subject to permit issuance before January 1, 2023. These dates

would require that an impacted refinery submit a permit application for Table 2 Near Limits before potentially knowing if a submitted I-Plan and B-Plan submitted have been approved. The Near Limits units included in both the I-Plan and the B-Plan, potentially without I-Plan or B-Plan approval, will make submitting a permit application, let alone receiving a permit, for the Near Limits not possible by January 1, 2023. Since the Near Limits are part of the I-Plan and B-Plan, they should be permitted in conjunction with the schedule approved by the District in the I-Plan and B-Plan, not on a separate schedule.

Other Concerns

Of note, TORC and District Staff are working to clarify other concerns with the Revised July 2021 Language including, but not limited to:

1. Definitions for CO Boilers, Flares, and Standard Conditions;
2. Not treating Table 2 limits as BARCT limits
3. Averaging periods for BARCT emission limits for units without CEMS;
4. Effective dates of the BARCT and Near Limits;
5. No provision to modify the B-Plan after control equipment is installed based on actual operational and emission data;
6. CEMS requirements for large vapor incinerators; and
7. Source test requirements for portable vapor incinerators.

* * *

In closing, there remains concerns with the Revised July 2021 Language as noted above that requires additional consideration in terms of producing a rule that achieves the desired goal of attaining emission reductions without creating unintentional consequences and undesirable impacts. TORC will continue to work diligently with District Staff and other stakeholders to address the complex issues associated with Revised July 21, 2021 Language.

Please note that in submitting this letter, TORC reserves the right to supplement its comments as it deems necessary, especially if additional or different information is made available to the public regarding the PR 1109.1 rulemaking process.

If you have any questions regarding TORC's comments, please call or email me or John Sakers. Our office phone numbers are 310-212-4500 (Steve) and (310) 212-4292 (John).

Sincerely,



Steve Steach
Refinery Manager

cc: **District Staff - via e-mail and overnight delivery**

Wayne Nastri	Executive Officer
Susan Nakamura	Assistant Deputy Executive Officer
Michael Krause	Planning and Rules Manager

cc: **District Refinery Committee Members - via e-mail and overnight delivery**

Hon. Ben Benoit	Governing Board Chair
Hon. Larry McCallon	Governing Board Member and Refinery Committee Chair
Hon. Lisa Bartlett	Governing Board Member and Refinery Committee Member

cc: **District Governing Board Members - via overnight delivery**

Hon. Joe Buscaino	Governing Board Member
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