



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

January 27, 2020

**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 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 2019 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.

The quarterly update below provides the current status of the design, purchase, installation, testing, and operational start date of the proffered safety enhancements. To the extent known, the update sets forth below the implementation schedule and going forward will advise of any delays or issues that may impact the anticipated completion of safety enhancements in 2021.

<b>Safety Enhancements</b>	<b>Fourth Quarter 2019 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>• Enhancement currently on schedule for implementation in 2021</li> </ul>
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>• Specialty equipment supplier selected</li> <li>• Enhancement currently on schedule for implementation in 2021</li> </ul>

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  
Daphne Hsu, South Coast AQMD  
Michael Krause, South Coast AQMD