

PETITION FOR VARIANCE
BEFORE THE HEARING BOARD OF THE
SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

20 APR 22 03:45

PETITIONER: TORRANCE REFINING COMPANY LLC
FACILITY ADDRESS: 3700 West 190th Street
CITY, STATE, ZIP: Torrance, CA 90509-2929

CASE NO: 6060-22
FACILITY ID: No. 181667

1. TYPE OF VARIANCE REQUESTED (more than one box may be checked; see Attachment A before selecting)
 INTERIM SHORT REGULAR EMERGENCY EX PARTE EMERGENCY

2. CONTACT: Name, title, company (if different than Petitioner), address, and phone number of persons authorized to receive notices regarding this Petition (no more than two authorized persons).

Michael S. McDonough
Pillsbury Winthrop Shaw Pittman LLP
725 South Figueroa St., Suite 2800
Los Angeles, CA Zip 90017
(213) 488-7555 Ext.
Fax (213) 629-1000
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Valerie Tse
Torrance Refining Company LLC
3700 West 190th Street
Torrance, California Zip 90504
(310) 212-1781 Ext.
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3. RECLAIM Permit Yes No Title V Permit Yes

4. **GOOD CAUSE:** Explain why your petition was not filed in sufficient time to issue the required public notice. (Required only for Emergency and Interim Variances; see Attachment A)

N/A

Persons with disabilities may request this document in an alternative format by contacting the Clerk of the Board at 909-396-2500 or by e-mail at clerkofboard@aqmd.gov.
If you require disability-related accommodations to facilitate participating in the hearing, contact the Clerk of the Board at least five (5) calendar days prior to the hearing.

5. Briefly describe the type of business and processes at your facility.

Torrance Refining Company LLC ("TORC") operates a petroleum refinery in Torrance, California ("Refinery"). Key processes at the Refinery include cracking of heavy petroleum hydrocarbons in the Refinery's FCCU, processing and treatment of crude oil feed in the Crude Unit, on-site production of hydrogen utilized in refining, storage and loading of gasoline and other finished petroleum products, and operation of numerous air pollution control systems. TORC owns and operates the Refinery, but the on-site Hydrogen Plant at issue in this petition, commonly referred to as Unit 24, is now separately owned and operated by Air Products West Coast Hydrogen LLC ("AP"). TORC transferred operational control of Unit 24 to AP on or about May 17, 2022. However, Unit 24 currently remains under TORC's Title V Facility Permit. TORC has coordinated with AP on all matters associated with this Variance Petition and the accompanying Alternative Operating Condition ("AOC") Petition.

6. List the equipment and/or activity(s) that are the subject of this petition (see Attachment A, Example #1). Attach copies of the Permit(s) to Construct and/or Permit(s) to Operate for the subject equipment. For RECLAIM or Title V facilities, attach *only* the relevant sections of the Facility Permit showing the equipment or process and conditions that are subject to this petition. You must bring the entire Facility Permit to the hearing.

Relevant pages of the Facility Permit are attached as Exhibit 1.

Equipment/Activity	Facility ID	RECLAIM Device No.	Date Application/Plan Denied (if relevant)*
Hydrogen Plant No. 2 (Unit 24)	181667	Process 6, System 2	N/A

*Attach copy of denial letter

7. Briefly describe the activity or equipment, and why it is necessary to the operation of your business. A schematic or diagram may be attached, in addition to the descriptive text.

The Refinery has historically operated Unit 24 and another Hydrogen Plant, Unit 4 (both now owned and operated by AP), to supply hydrogen for use in hydrotreating and other refining operations. Such hydrogen supply is critical to removing sulfur from crude feedstocks as they are refined into low-sulfur transportation fuels. The Hydrogen Plants operate through combining heated Refinery gases with steam across a catalyst to help produce a hydrogen stream effluent. Hydrogen is further filtered out in the Pressure Swing Absorption (PSA) section of the unit. When the PSA cycles, impurities are removed and sent to the reformer as fuel. Anything adsorbed onto the mol sieve is released and burned.

8. Is there a regular maintenance and/or inspection schedule for this equipment? Yes No

If yes, how often: See below Date of last maintenance and/or inspection: See below

Describe the maintenance and/or inspection that was performed.

Pursuant to applicable federal and state regulations as well as industry standards, and relevant to the Variance and AOC Petitions, the Unit 24 Hydrogen Plant is regularly maintained using a combination of frequent external inspections and scheduled periodic outages for major maintenance. Consistent with this, TORC historically, and now AP, conduct planned and unplanned preventative maintenance as needed on Unit 24 and its supporting equipment. Regular maintenance and inspection are performed during Refinery turnarounds. The last turnaround involving Unit 24 occurred in September 2023, at which time inspections, preventive maintenance and repairs on the unit were performed.

TORC historically has conducted annual compliance testing on Unit 24 as required by District Rule 1189. The last annual compliance test for Unit 24 was conducted on April 25, 2025, and the next annual compliance test must be conducted by AP on or before April 30, 2026.

9. List all District rules, and/or permit conditions from which you are seeking variance relief (if requesting variance from Rule 401 or permit condition, see Attachment A). Briefly explain how you are or will be in violation of each rule or condition (see Attachment A, Example #2).

Rule	Explanation
203(b), 2004(f)(1), 3002(c)(1)	Under District Rule 203(b), equipment that is required to have a permit "shall not be operated contrary to the conditions specified in the permit to operate." District Rule 2004(f)(1) and Rule 3002(c)(1) reiterate the requirement to comply with all Permit Conditions. Because the Refinery will be unable to comply with the various District Rules and Regulations and Title V Permit conditions listed below, the Refinery will also need a variance from Rules 203(b), 2004(f)(1) and 3002(c)(1).
District Rule 1189(e)(1) 203(b) & 2004(f)(1) & 3002(c) [Condition Nos. S13.5 of Facility P/O No. 181667]	District Rule 1189(e)(1) requires operators of hydrogen plants to conduct annual compliance testing to demonstrate compliance with VOC limits in Rule 1189(c)(3), and this testing is required to be completed and test reports submitted to the District "within 12 calendar months from previous testing and reporting." Pursuant to Rule 1189 Attachment A, "[t]esting must be conducted under normal operating conditions" and "hydrogen production [during the compliance test] must not be less than the annual operating hourly average." Condition S13.5, applicable to Process 6, Systems 1 and 2, provides that "[a]ll devices under this system are subject to the applicable requirements of the following rules or regulations: VOC: District Rule 1189." As TORC understands from AP, due to previous 24C-5 demister pad damage and unexpected degradation, Unit 24 currently is being operated at a hydrogen production rate that is below the required annual operating average rate for Rule 1189 annual compliance testing. AP advised TORC on April 13, 2026, that, to restore sufficient hydrogen production to allow the Rule 1189 annual compliance testing to take place, diagnostic/root cause analysis work will need to be done and repairs to the demisters (the expected source of the run rate problem) will be needed, necessitating a unit shutdown. Because the root cause analysis and repair work cannot begin until mid-May (required for coordination with concurrent hydrotreater catalyst changeout) and may last until late June, this will make it impossible for AP (and TORC) to conduct the Rule 1189 annual compliance testing of Unit 24 on or before April 30, 2026, as required by Rule 1189(e)(1) and Condition S13.5. Thus, a variance will be necessary to conduct the source test of Unit 24 after April 30, 2026.

10. Are the equipment or activities subject to this request currently under variance coverage? Yes No

Case No.	Date of Action	Final Compliance Date	Explanation
N/A			

11. Are any other equipment or activities at this location currently (or within the last six months) under variance coverage? Yes No

Case No.	Date of Action	Final Compliance Date	Explanation
N/A			

12. Were you issued any Notice(s) of Violation or Notice(s) to Comply concerning this equipment or activity within the past year? Yes No

If yes, you must attach a copy of each notice. **Attached as Exhibit 2.**

13. Have you received any complaints from the public regarding the operation of the subject equipment or activity within the last six months? Yes No

If yes, you should be prepared to present details at the hearing.

14. Explain why it is beyond your reasonable control to comply with the rule(s) and/or permit condition(s):

Historically, the Refinery has owned and operated two Hydrogen Plants, commonly referred to as Units 4 and 24, on the property of the Refinery, which were operated to provide hydrogen and steam for use at the Refinery. In April 2020, TORC sold the two units to AP, though at that time the Refinery continued to operate the units pursuant to an agreement with AP. In May 2022, AP took over full operation of Units 4 and 24, and the District is currently processing AP's application for a Title V permit to operate Units 4 and 24 in AP's own name. At the present time, the units continue to be listed in the Refinery's Title V permit, requiring TORC's involvement in applying for a variance.

District Rule 1189(e)(1) requires operators of hydrogen plants to conduct annual compliance testing to demonstrate compliance with VOC limits in Rule 1189(c)(3), and this testing is required to be completed and test reports submitted to the District "within 12 calendar months from previous testing and reporting." Pursuant to Rule 1189 Attachment A, "[t]esting must be conducted under normal operating conditions" and "hydrogen production [during the compliance test] must not be less than the annual operating hourly average."

As TORC understands from AP, due to previous 24C-5 demister pad damage and unexpected degradation, Unit 24 currently is being operated at a hydrogen production rate that is below the required annual operating average rate for Rule 1189 annual compliance testing. AP advised TORC on April 13, 2026, that, to restore sufficient hydrogen production to allow the Rule 1189 annual compliance testing to take place, diagnostic/root cause analysis work will need to be done and repairs to the demisters (the expected source of the run rate problem) will be needed, necessitating a unit shutdown. Because the root cause analysis and repair work cannot begin until mid-May (required for coordination with concurrent hydrotreater catalyst changeout) and may last until late June, this will make it impossible for AP (and TORC) to conduct the Rule 1189 annual compliance testing of Unit 24 on or before April 30, 2026, as required by Rule 1189(e)(1) and Condition S13.5. Thus, a variance will be necessary to conduct the source test of Unit 24 after April 30, 2026.

AP and TORC anticipate that the Unit 24 repair, subsequent start-up, and a return to annual operating average run rate likely cannot be completed until late June 2026, meaning that it will be beyond AP's and TORC's reasonable control to comply with Rule 1189 and Title V Permit Condition S13.5 unless a variance is granted allowing for an extension to conduct the compliance testing after April 30, 2026. As a result, AP and TORC also anticipate non-compliance with District Rules 203(b), 2004(f)(1) and 3002(c), which generally require compliance with all permit conditions. No excess emissions will be generated as a result of the variance being granted, and the Unit 24 Hydrogen Plant is not an emissions control device. Also, odorous substances are not anticipated to be released in any quantity sufficient for it to be detectable to the public.

The Refinery and AP expect that, after demister pad repair and unit startup, Unit 24 should be able to reach the hydrogen production rate necessary to allow Rule 1189 annual compliance testing shortly thereafter, but no later than July 31, 2026. Prior to filing the Variance and AOC petition, TORC has notified District personnel of the need to seek a variance granting an extension until this time to conduct the compliance test.

15. When and how did you first become aware that you would not be in compliance with the rule(s) and/or permit condition(s)?

TORC did not become aware of AP's inability to timely perform the Unit 24 source testing until April 13, 2026, when AP first informed TORC that damage to the demister pad in Unit 24C-5 (the PSA upstream liquid knockout) was likely the reason for recent lower Unit 24 run rates not approaching annual averages. AP advised TORC that AP itself did not become aware of its inability to produce average run rates until April 8, 2026, when it reviewed its 12-month average run rate and diagnosed that the demister pad issues were serious enough to require unit shutdown for the necessary repairs to restore a run rate adequate for source testing.

16. What actions have you taken since that time to achieve compliance?

The Refinery and AP have worked together to develop a schedule for diagnosing the technical issues, replacing the Unit 24C-4 and 24C-5 demister pads and completing associated work. The plan is to shut down and then diagnose and execute a repair of the demister pads; perform confined space entry into Units 24C-6 and 24C-7; purge and dry all affected piping between 24C-5 and the burners; and pull and inspect 29 burners. With the demister pads replacement set for mid-May 2026 and with the subsequent unit startup and hydrogen production ramp up, the Refinery and AP expect that the Rule 1189 annual compliance testing will only be able to take place shortly by mid- to late-July. That led the Refinery to work expeditiously to prepare and file these Variance and AOC Petitions to seek variance relief from the Hearing Board.

17. What would be the harm to your business during and/or after the variance period if the variance were not granted?

Economic losses: Approximately \$1.6 million per day. See below.

Number of employees laid off (if any): See below.

Provide detailed information regarding economic losses, if any, (anticipated business closure, breach of contracts, hardship on customers, layoffs, and/or similar impacts).

The denial of this Variance and AOC would result in harm to TORC and AP, and to California citizens who rely on transportation fuels supplied by the Refinery. AP has advised TORC that Unit 24 cannot be returned to its average annual run rate without repairs, and these repairs likely will extend into late June. Thus, the Rule 1189 annual compliance test cannot be conducted by April 30, 2026. If a variance is not granted to allow an extension of that date, AP's and TORC's only option to maintain strict compliance would be to shut down Unit 24 – potentially permanently if no eventual variance relief is granted. This would result in the Refinery operating at minimum rates due to lack of necessary hydrogen and steam supply for refining operations. Under this scenario, operating the Refinery at minimum rates would not only cause estimate economic losses of \$1.6 million per day to the Refinery, but also result in a reduction in supply of gasoline, diesel, jet fuel and other petroleum products to the market, and have corresponding adverse impacts to California citizens who rely on those transportation fuels. The economic impacts to California consumers from restricted transportation fuel supply are unknown, but likely would also be significant.

Denial of the variance also would result in the Refinery potentially experiencing two periods of potential flaring rather than one, in that waiting to shut down Unit 24 to coincide with the hydrotreater shutdown avoids having two separate shutdown events and, thus, two possible flare events.

In contrast, granting the Variance and AOC Petitions will avoid this scenario and result in zero excess emissions. Thus, TORC believes that granting this Variance and AOC will not result in any excess emissions and would be far preferable to denying the Petitions and forcing the Refinery to run at minimum rates, thereby further impacting an already reduced supply of fuel products in the market.

18. Can you curtail or terminate operations in lieu of, or in addition to, obtaining a variance? Please explain.

Curtailing operations will not allow TORC and AP to make the April 30, 2026, deadline for conducting the annual source test for Unit 24. And while TORC and AP could theoretically shut down Unit 24 indefinitely in an attempt to maintain strict compliance, this would cause the FCCU and numerous other refining process units that rely on Unit 24 for hydrogen and steam to be indefinitely operated at minimum rates, resulting in significant adverse consequences to the market and excess emissions related to flaring and/or shutdown of other refinery units. In contrast, no excess emissions are expected if this variance is granted.

19. Estimate excess emissions, if any, on a daily basis, including, if applicable, excess opacity (the percentage of total opacity above 20% during the variance period). If the variance will result in no excess emissions, skip to No. 20.

Pollutant	(A)	(B)	(C)*
	Total Estimated Excess Emissions (lbs/day)	Reduction Due to Mitigation (lbs/day)	Net Emissions After Mitigation (lbs/day)
N/A	N/A	N/A	N/A

* Column A minus Column B = Column C

Excess Opacity: N/A %

20. Show calculations used to estimate quantities in No. 19, or explain why there will be no excess emissions.

As discussed above, granting this variance will not result in any excess emissions, as the Unit 24 Hydrogen Plant is neither a pollution control device nor adversely impacts emissions from other units at the Refinery. Also, odorous substances are not anticipated to be released in any quantity sufficient for it to be detectable to the public.

21. Explain how you plan to reduce (mitigate) excess emissions during the variance period to the maximum extent feasible, or why reductions are not feasible.

As discussed above, granting this variance will not result in any excess emissions, as the Unit 24 Hydrogen Plant is neither a pollution control device nor adversely impacts emissions from other units at the Refinery. Also, odorous substances are not anticipated to be released in any quantity sufficient for it to be detectable to

the public. However, TORC has proposed to comply with a number of notifications and other conditions in the proposed Variance Conditions attached as **Exhibit 3**.

22. How do you plan to monitor or quantify emission levels from the equipment or activity(s) during the variance period, and to make such records available to the District? **Any proposed monitoring does not relieve RECLAIM facilities from applicable missing data requirements.**

As discussed above, granting this variance will not result in any excess emissions, as the extension of the Rule 1189 source testing for Unit 24 neither impacts the operation of any pollution control device nor adversely impacts emissions from other units at the Refinery. Other Refinery emissions during the Variance and AOC period will continue to be monitored by the applicable CEMS.

23. How do you intend to achieve compliance with the rule(s) and/or permit condition(s)? Include a detailed description of any equipment to be installed, modifications or process changes to be made, permit conditions to be amended, etc., dates by which the actions will be completed, and an estimate of total costs.

During the variance period, the Refinery and AP plan to return to compliance by completing the Unit 24 demister pads replacement as safely and quickly as possible, and then by immediately scheduling and conducting the Rule 1189 annual compliance testing once Unit 24 hydrogen production rate is restored and ramped up. As noted above, TORC expects that the compliance testing should take place by mid- to late-July.

24. State the date by which you expect to achieve final compliance: July 31, 2026

If the regular variance is to extend beyond one year, you **must** include a **Schedule of Increments of Progress**, specifying dates or time increments for steps needed to achieve compliance. See District Rule 102 for definition of Increments of Progress (see Attachment A, Example #3).

List Increments of Progress here:
N/A

25. List the names of any District personnel with whom facility representatives have had contact concerning this variance petition or any related Notice of Violation or Notice to Comply.

Inspector Deryck Roberts

Ext. (310) 233-7011

The undersigned, under penalty of perjury, states that the above petition, including attachments and the items therein set forth, is true and correct.

Executed on April 22, 2026, at Torrance, California

Valerie Tse
Signature

Valerie Tse
Print Name

Process Safety and Environmental Manager
Title

26. SMALL BUSINESS and TABLE III SCHEDULE A FEES: To be eligible for reduced fees for small businesses, individuals, or entities meeting small business gross receipts criterion [see District Rule 303(h)], you must complete the following:

Declaration Re Reduced Fee Eligibility

1. The petitioner is

a) an individual, or

b) an officer, partner or owner of the petitioner herein, or a duly authorized agent of the petitioner authorized to make the representations set forth herein.

If you selected 1a, above, skip item 2.

2. The petitioner is

a) a business that meets the following definition of Small Business as set forth in District Rule 102: SMALL BUSINESS means a business which is independently owned and operated and meets the following criteria, or if affiliated with another concern, the combined activities of both concerns shall meet these criteria:

(a) the number of employees is 10 or less; AND

(b) the total gross annual receipts are \$500,000 or less or

(iii) the facility is a not-for-profit training center.

-OR-

b) an entity with total gross annual receipts of \$500,000 or less.

3. Therefore, I believe the petitioner qualifies for reduced fees for purpose of filing fees and excess emission fee calculations, in accordance with Rule 303(h).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on _____, at _____, California

Signature

Print Name

Title



**FACILITY PERMIT TO OPERATE
TORRANCE REFINING COMPANY LLC**

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 6: HYDROGEN PRODUCTION UNITS (OWNED BY AIR PRODUCTS WEST COAST HYDROGEN LLC)					
VESSEL, 4C-19, METHANTOR FEED GAS, SCRUBBER, HEIGHT: 16 FT 6 IN; DIAMETER: 3 FT A/N: 641578	D2459				
TANK, 4D-4, CAUSTIC STORAGE, HEIGHT: 6 FT ; DIAMETER: 5 FT A/N: 641578	D2460				
TANK, 4D-3, MDEA FEED, HEIGHT: 24 FT ; DIAMETER: 25 FT A/N: 641578	D2461				
FILTER, 4J-2, MDEA, HEIGHT: 3 FT 4 IN; DIAMETER: 1 FT 4 IN A/N: 641578	D2462				
FILTER, 4J-2B, MDEA, HEIGHT: 3 FT 4 IN; DIAMETER: 1 FT 4 IN A/N: 641578	D2489				
VESSEL, SEPARATOR, VAPOR, 4J-11, HEIGHT: 6 FT 8 IN; DIAMETER: 2 FT A/N: 641578	D2463				
VESSEL, ACTIVATED CARBON, 4J-33, LIQUID PHASE, TWO IN PARALLEL, 10,000 LBS EACH, HEIGHT: 11 FT 7 IN; DIAMETER: 7 FT 5 IN A/N: 641578	D2464				
FUGITIVE EMISSIONS, MISCELLANEOUS A/N: 641578	D1815			HAP: (10) [40CFR 63 Subpart CC, #5A, 11-19-2020]	H23.34
System 2: HYDROGEN PLANT NO. 2					S2.1, S13.2, S13.5, S15.1, S15.2, S31.2

- * (1) (1A) (1B) Denotes RECLAIM emission factor
- (3) Denotes RECLAIM concentration limit
- (5) (5A) (5B) Denotes command and control emission limit
- (7) Denotes NSR applicability limit
- (9) See App B for Emission Limits
- (2) (2A) (2B) Denotes RECLAIM emission rate
- (4) Denotes BACT emission limit
- (6) Denotes air toxic control rule limit
- (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
- (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

(Petition for Variance: Revised December 10, 2008)

[YOU MAY ATTACH ADDITIONAL PAGES IF NECESSARY]

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Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 6: HYDROGEN PRODUCTION UNITS (OWNED BY AIR PRODUCTS WEST COAST HYDROGEN LLC)					
KNOCK OUT POT, 24C-1, FUEL GAS (INLINE MIXED NATURAL GAS & REFINERY GASES), COMMON TO GAS TURBINE COMBUSTOR (FUEL GAS) & H2 PLANT REACTOR (FEED GAS), HEIGHT: 9 FT 6 IN; DIAMETER: 6 FT A/N: 641646	D2234				
KNOCK OUT POT, 24C-2, FEED GAS, LENGTH: 9 FT 6 IN; DIAMETER: 4 FT 6 IN A/N: 641613	D385				
VESSEL, SEPARATOR/FILTER, 24J-19, OIL/FEED GAS, HEIGHT: 4 FT, DIAMETER: 1 FT 8 IN A/N: 641613	D2241				
FILTER, 24-J-13, FUEL GAS A/N: 641613	D1266				
COMPRESSOR, 24K-4A/B, RECIPROCATING, 2 TOTAL IN PARALLEL, 4500-HP EACH, 1ST STAGE, COMMON TO GAS TURBINE (FUEL GAS) & H2 PLANT (FEED GAS) A/N: 641646	D2235				E336.15, H23.34
COMPRESSOR, 24K-4A/B, FEED GAS, 2 TOTAL, 4500-HP EACH A/N: 641613	D390				H23.34
REACTOR, HDS, 24C-11, LENGTH: 20 FT 6 IN; DIAMETER: 9 FT A/N: 641613	D368				E448.5
REACTOR, 24C-12, ZINC OXIDE, LENGTH: 19 FT 6 IN; DIAMETER: 10 FT A/N: 641613	D369				E448.5

- * (1) (1A) (1B) Denotes RECLAIM emission factor
- (3) Denotes RECLAIM concentration limit
- (5) (5A) (5B) Denotes command and control emission limit
- (7) Denotes NSR applicability limit
- (9) See App B for Emission Limits
- (2) (2A) (2B) Denotes RECLAIM emission rate
- (4) Denotes BACT emission limit
- (6) Denotes air toxic control rule limit
- (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
- (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.



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Process 6: HYDROGEN PRODUCTION UNITS (OWNED BY AIR PRODUCTS WEST COAST HYDROGEN LLC)					
REACTOR, 24C-13, ZINC OXIDE, HEIGHT: 19 FT 6 IN; DIAMETER: 10 FT A/N: 641613	D370				E448.5
REACTOR, 24F-1(R), STEAM/HC REFORMING, TUBULAR TYPE, INTERNALLY INTEGRATED WITH FURNACE 24F-1 A/N: 641613	D2242				
REACTOR, HIGH TEMPERATURE SHIFT, 24C-14, HEIGHT: 21 FT ; DIAMETER: 13 FT A/N: 641613	D371				
REACTOR, LTS REACTOR, 24C-50, HEIGHT: 16 FT 6 IN; DIAMETER: 13 FT A/N: 641613	D1203				
KNOCK OUT POT, 24C-4, NO. 1 LTS EFFLUENT, LENGTH: 9 FT ; DIAMETER: 10 FT A/N: 641613	D386				
KNOCK OUT POT, 24C-25, NO. 2 LTS EFFLUENT, LENGTH: 11 FT ; DIAMETER: 7 FT A/N: 641613	D387				
ADSORBER, PRESSURE SWING, 24C-15 TO 24C-26, 12 TOTAL, HEIGHT: 20 FT 9 IN; DIAMETER: 12 FT 6 IN A/N: 641613	D372				
FILTER, 24J-5A/B, HYDROGEN PRODUCT GAS, 2 TOTAL A/N: 641613	D392				

- * (1) (1A) (1B) Denotes RECLAIM emission factor
- (3) Denotes RECLAIM concentration limit
- (5) (5A) (5B) Denotes command and control emission limit
- (7) Denotes NSR applicability limit
- (9) See App B for Emission Limits
- (2) (2A) (2B) Denotes RECLAIM emission rate
- (4) Denotes BACT emission limit
- (6) Denotes air toxic control rule limit
- (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
- (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.



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Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 6: HYDROGEN PRODUCTION UNITS (OWNED BY AIR PRODUCTS WEST COAST HYDROGEN LLC)					
VESSEL, 24C-7, PSA GAS SURGE, HEIGHT: 67 FT 1 IN; DIAMETER: 12 FT 6 IN A/N: 641613	D2243				
VESSEL, 24C-6, PSA GAS MIX, HEIGHT: 93 FT 8 IN; DIAMETER: 12 FT 6 IN A/N: 641613	D2244				
VESSEL, DEAERATOR, 24C-10, VENT TO ATMOSPHERE, HEIGHT: 10 FT : DIAMETER: 10 FT A/N: 641613	D2245				
FUGITIVE EMISSIONS, MISCELLANEOUS A/N: 641613	D1936			HAP: (10) [40CFR 63 Subpart CC, #5A, 11-19-2020]	H23.34
System 3: HYDROGEN PRODUCTION UNITS HEATERS					
HEATER, HYDROGEN PLANT REFORMING, 4F-1, NATURAL GAS, REFINERY GAS, WITH ZEECO BURNER MODEL GLSF10, 460 MMBTU/HR WITH A/N: 641580	D367	S1971 S2021 C2628	NOX: MAJOR SOURCE** SOX: MAJOR SOURCE**	CO: 2000 PPMV (5) [RULE 407, 4-2-1982]; HAP: (10) [40CFR 63 Subpart DDDD, 11-20-2015]; PM: (9) [RULE 404, 2-7-1986]; PM: 0.1 GRAINS/SCF (5) [RULE 409, 8-7-1981]	A63.6, B61.3, B61.11, C1.83, D29.7, D90.12, E74.2, E193.16, E193.31, H23.13
BURNER, NATURAL GAS, REFINERY GAS, ZEECO, MODEL GLSF10, WITH LOW NOX BURNER, 136 TOTAL: 460 MMBTU/HR					
STACK, EAST A/N: 641580	S1971	D367 C2628			
STACK, WEST A/N: 641580	S2021	D367 C2628			

- * (1) (1A) (1B) Denotes RECLAIM emission factor
- (3) Denotes RECLAIM concentration limit
- (5) (5A) (5B) Denotes command and control emission limit
- (7) Denotes NSR applicability limit
- (9) See App B for Emission Limits
- (2) (2A) (2B) Denotes RECLAIM emission rate
- (4) Denotes BACT emission limit
- (6) Denotes air toxic control rule limit
- (8) (8A) (8B) Denotes 40 CFR limit (c.g. NSPS, NESHAPS, etc.)
- (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.



**FACILITY PERMIT TO OPERATE
TORRANCE REFINING COMPANY LLC**

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

VOC | District Rule | 1178

[RULE 1178, 4-7-2006; RULE 1178, 11-6-2020; RULE 463, 11-4-2011]

[Systems subject to this condition : Process 15, System 1 , 2 , 5]

S13.5 All devices under this system are subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
VOC	District Rule	1189

[RULE 1189, 1-21-2000]

[Systems subject to this condition : Process 6, System 1 , 2]

S13.6 All devices under this system are subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
SOX	40CFR60, SUBPART	J

[40CFR 60 Subpart J, 9-12-2012; RULE EMISSION LIMIT/REQUIREMENT SURVIVING TERMINATION OF CONSENT DECREE, 12-13-2005]

[Systems subject to this condition : Process 12, System 1 , 2 , 3 , 4]

S13.7 All devices under this system are subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart



South Coast Air Quality Management District
21865 COPLEY DRIVE, DIAMOND BAR, CA 91765-4178

P 67976

NOTICE OF VIOLATION

DATE OF VIOLATION		
Month: 6	Day: 30	Year: 2025

Facility Name: <i>Turkey Roasting Company</i>		Facility ID#: <i>181667</i>	Sector:
Location Address: <i>3760 West 190th St</i>		City: <i>Lawrence</i>	Zip: <i>90504</i>
Mailing Address: <i>3760 West 190th St</i>		City: <i>Lawrence</i>	Zip: <i>90504</i>

YOU ARE HEREBY NOTIFIED THAT YOU HAVE BEEN CITED FOR ONE OR MORE VIOLATIONS OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT (SCAQMD) RULES, STATE LAW OR FEDERAL LAW. IF PROVEN, SUCH VIOLATION(S) MAY RESULT IN THE IMPOSITION OF CIVIL OR CRIMINAL PENALTIES.

EACH DAY A VIOLATION OCCURS MAY BE HANDLED AS A SEPARATE OFFENSE REGARDLESS OF WHETHER OR NOT ADDITIONAL NOTICES OF VIOLATION ARE ISSUED.

DESCRIPTION OF VIOLATIONS

#	Authority*	Code Section or Rule No.	SCAQMD Permit to Operate or CARB Registration No.	Condition No. (If Applicable)	Description of Violation
1	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				<i>SEE ATTACHMENT A</i>
2	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
3	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
4	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
5	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				

The correct issued date is July 18, 2025

Served To: <i>Paul Henderson</i>	Phone: <i>909-287-6766</i>	Served By: <i>Paul Henderson</i>	Date Notice Served: <i>7/25/25</i>
Title: <i>Facility Manager</i>	Email: <i>phenderson@aqmd.gov</i>	Phone No: <input type="checkbox"/> 909-396- <input type="checkbox"/> 310-233-7000	Email: <i>phenderson@aqmd.gov</i>

*Key to Authority Abbreviations: SCAQMD – South Coast Air Quality Management District CH&SC – California Health and Safety Code CCR – California Code of Regulations	Method of Service: <input checked="" type="checkbox"/> In Person <input type="checkbox"/> Certified Mail
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South Coast Air Quality Management District
21865 COPLEY DRIVE, DIAMOND BAR, CA 91765-4178

P 87977

NOTICE OF VIOLATION

DATE OF VIOLATION		
Month:	Day:	Year:
12	31	2025

Facility Name: <i>T. J. ...</i>		Facility ID#: <i>181607</i>	Sector:
Location Address: <i>3700 West 190th St</i>		City: <i>Irving</i>	Zip: <i>92604</i>
Mailing Address: <i>3700 West 190th St</i>		City: <i>Irving</i>	Zip: <i>92604</i>

YOU ARE HEREBY NOTIFIED THAT YOU HAVE BEEN CITED FOR ONE OR MORE VIOLATIONS OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT (SCAQMD) RULES, STATE LAW OR FEDERAL LAW. IF PROVEN, SUCH VIOLATION(S) MAY RESULT IN THE IMPOSITION OF CIVIL OR CRIMINAL PENALTIES.

EACH DAY A VIOLATION OCCURS MAY BE HANDLED AS A SEPARATE OFFENSE REGARDLESS OF WHETHER OR NOT ADDITIONAL NOTICES OF VIOLATION ARE ISSUED.

DESCRIPTION OF VIOLATIONS

#	Authority*	Code Section or Rule No.	SCAQMD Permit to Operate or CARB Registration No.	Condition No. (If Applicable)	Description of Violation
1	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	<i>241.6</i>	<i>2004 (15)</i>	<i>50</i>	<i>...</i>
2	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				<i>...</i>
3	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
4	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
5	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				

The correct issued date is July 18, 2025

Served To: <i>Ray Bozeman</i>	Phone: <i>909-387-0546</i>	Served By: <i>Ray Bozeman</i>	Date Notice Served: <i>10/31/25</i>
Title: <i>ENV ADVISOR</i>	Email: <i>Ray.Bozeman@aqmd.gov</i>	Phone No: <input type="checkbox"/> 909-396- <input type="checkbox"/> 310-233-	Email: <i>Ray.Bozeman@aqmd.gov</i>

*Key to Authority Abbreviations: SCAQMD – South Coast Air Quality Management District CH&SC – California Health and Safety Code CCR – California Code of Regulations	Method of Service: <input checked="" type="checkbox"/> In Person <input type="checkbox"/> Certified Mail
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South Coast Air Quality Management District
21865 COPLEY DRIVE, DIAMOND BAR, CA 91765-4178

NOTICE OF VIOLATION

P 67977

DATE OF VIOLATION		
Month	Day	Year
12	31	22

Facility Name Tartan Refining Company	Facility ID 181667	Sector
Location Address 3700 West 190th St	City La Brea	Zip 90504
Mailing Address 3700 West 190th St	City La Brea	Zip 90504

YOU ARE HEREBY NOTIFIED THAT YOU HAVE BEEN CITED FOR ONE OR MORE VIOLATIONS OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT (SCAQMD) RULES, STATE LAW OR FEDERAL LAW. IF PROVEN, SUCH VIOLATION(S) MAY RESULT IN THE IMPOSITION OF CIVIL OR CRIMINAL PENALTIES.

EACH DAY A VIOLATION OCCURS MAY BE HANDLED AS A SEPARATE OFFENSE REGARDLESS OF WHETHER OR NOT ADDITIONAL NOTICES OF VIOLATION ARE ISSUED.

DESCRIPTION OF VIOLATIONS

No.	Authority*	Code Section or Rule No.	SCAQMD Permit to Operate or CARB Registration No.	Condition No. (If Applicable)	Description of Violation
1	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	202(n) 2004(P)(1) 3002(C)(1)	C1590 (P)	E7 E8	
2	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	3002 (C)(1) (P)		S50	ATTACHMENT "A"
3	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
4	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
5	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				

Served To Raja Bozokona	Phone 408-887-0546	Signature Raja Bozokona	Date Notice Served 18 JUL 25
Title ENV ADVISOR	Email Raja.Bozokona@PBR.com	Phone (alt) <input type="checkbox"/> 909-396- <input checked="" type="checkbox"/> 310-233-7002	Email RBozokona@aqmd.gov
*Key to Authority Abbreviations		Method of Service	
SCAQMD - South Coast Air Quality Management District CH&SC - California Health and Safety Code CFR - California Code of Regulations		<input checked="" type="checkbox"/> Person <input type="checkbox"/> Certified Mail	

ORIGINAL

NOV P67077 Attachment A

				Date	Device			Rule
NOV				7/24/2022	C395			203(b), 2004(f)(1), 3002(c)(1), E71.7
NOV				7/22/2022	D925			203(b), 2004(f)(1), 3002(c)(1), C1.12
NOV	712058	NOV		8/15/2022	D1239			203(b), 2004(f)(1), 3002(c)(1), E8, B61.1
NOV				9/30/2022	D741, D731, D730			203(b), 2004(f)(1), 3002(c)(1), 1178(d)(2)(B), D182-5, K67.2
NOV				10/11/2022	Portable			203(b), 2004(f)(1), 3002(c)(1), VRRP Conditions 2, 4, 10, 11, 15, 17, 21
NOV				11/22/2022	D367, C2628			203(b), 2004(f)(1), 3002(c)(1), 1189(c)(1), Attachment A-General Requirements 1, E8, E10
NOV				12/31/2022	D1862, D1825			203(b), 2004(f)(1), 3002(c)(1), NSPS Vva(60.482-8a(a)(1)) and VVa(60.482-6(a)(1)) NSPS GGGa(60.592a(a)), NESHAPS CC 63.648(a), H23.34, REG IX, REG X



South Coast Air Quality Management District
21865 COPLEY DRIVE, DIAMOND BAR, CA 91765-4178

P 68213

NOTICE OF VIOLATION

DATE OF VIOLATION		
Month: 01 06	Day: 01 20	Year: 2023 2023

Facility Name: TORRANCE REFINING COMPANY LLC		Facility ID#: 181667	Sector: LF
Location Address: 3700 W. 190th St.		City: Torrance	Zip: 90504
Mailing Address: 3700 W. 190th St.		City: Torrance	Zip: 90504

YOU ARE HEREBY NOTIFIED THAT YOU HAVE BEEN CITED FOR ONE OR MORE VIOLATIONS OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT (SCAQMD) RULES, STATE LAW OR FEDERAL LAW. IF PROVEN, SUCH VIOLATION(S) MAY RESULT IN THE IMPOSITION OF CIVIL OR CRIMINAL PENALTIES.

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DESCRIPTION OF VIOLATIONS

#	Authority*	Code Section or Rule No.	SCAQMD Permit to Operate or CARB Registration No.	Condition No (If Applicable)	Description of Violation
1	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	Rule 3002(C)(1)	Title V	E2	Failure to operate equipment in compliance with all conditions specified in the Title V permit at all times (Fire pump).
2	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	Rules 3002(C)(1) 1148(d)(2)(B)	Title V	D182.5 K67.2	Failure to obtain samples for two (2) storage tanks.
3	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	Rule 3002(C)(1)	Title V	C112	Failure to operate equipment in compliance with all conditions specified in the Title V permit at all times (Firing rate for 24F-1).
4	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	Rule 3002(C)(1)	Title V	E.4 E.8 E193.19	Failure to operate equipment in compliance with all conditions specified in the Title V permit at all times (FCC ESP).
5	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input checked="" type="checkbox"/> CFR	Rule 3002(C)(1) 40CFR60.5 40CFR60.5 40CFR60.5	Title V open VV w/PTV w/PTV	H2334	Failure to equip open ended line with a cap, blind flange, plug, or a second valve.

Served To: Craig Sakamoto	Phone: (310) 212-1884	Served By: EDUARDO ESPARZA	Date Notice Served: 03/18/2026
Title: Environmental Manager	Email: Craig.Sakamoto@energy.com	Phone No: <input type="checkbox"/> 909-396- <input checked="" type="checkbox"/> 310-233-7023	Email: EESPARZA @ aqmd.gov

*Key to Authority Abbreviations: SCAQMD - South Coast Air Quality Management District CH&SC - California Health and Safety Code CCR - California Code of Regulations	Method of Service: <input checked="" type="checkbox"/> In Person <input type="checkbox"/> Certified Mail
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VIOLATOR'S COPY

Exhibit 3
Torrance Refining Company
Proposed Variance Conditions for
Case No. 6060-22

1. Petitioner shall inform South Coast Air Quality Management District compliance personnel by calling 1-800-CUT-SMOG (Attn: Inspector Deryck Roberts) to report a *Variance Notification* within seventy-two (72) hours following the start of the variance period.
2. Petitioner shall notify the South Coast Air Quality Management District compliance personnel by calling 1-800-CUT-SMOG (Attn: Inspector Deryck Roberts) forty-eight (48) hours prior to day of scheduled Rule 1189 source test.
3. During the variance period, every Wednesday by 5 pm, Petitioner shall electronically mail to Inspectors Deryck Roberts (droberts@aqmd.gov) the hourly average of the hydrogen production rate of the past week up to the conclusion time of the source test.
4. Petitioner shall conduct Rule 1189 source test within thirty (30) days of reaching targeted hydrogen production rate required to conduct source test.
5. Petitioner shall notify South Coast Air Quality Management District compliance personnel by calling 1-800-CUT-SMOG (Attn: Deryck Roberts) at least two (2) hours prior to the start of the Rule 1189 source test, but continuing to keep the inspector updated if the initial anticipated test start time changes.
6. Petitioner shall notify the Air Quality Inspector Deryck Roberts (droberts@aqmd.gov) via electronic mail, and by calling 1-800-CUT-SMOG (Attn: Deryck Roberts) to report Variance Notification within two (2) hours of achieving final compliance and completion of the AOC period.
7. Petitioner shall notify the Clerk of the Board in writing within five days of achieving final compliance as referenced in Condition 6.
8. In the event U.S. EPA objects to this AOC within the 45-day review period or in response to a timely citizen petition, this AOC shall be ineffective to protect Petitioner from U.S. EPA or citizen enforcement under the federal Clean Air Act for any federally enforceable requirement.
9. Petitioner shall pay all applicable fees to the Clerk of the Hearing Board or the variance shall be invalidated pursuant to Rule 303(k), except for excess emissions fees if applicable, which shall be paid within fifteen (15) days of notification in writing that the fees are due, unless otherwise ordered by the Hearing Board

**SUPPLEMENT TO PETITION FOR VARIANCE
ALTERNATIVE OPERATING CONDITION (AOC)**

PETITIONER: TORRANCE REFINING COMPANY LLC

CASE NO: 6060-22

~~26~~ 26 ~~APR 22~~ APR 22 FACILITY ID: 181667

FACILITY ADDRESS: 3700 West 190th Street

CITY, STATE, ZIP: Torrance, CA 90504

Petitioner is requesting an Alternative Operating Condition (AOC) which will act as a permit revision to the Title V facility permit. Last Revision issued on January 28, 2022.

1. Are you located within 50 miles of an affected state or Indian reservation? No Yes

State	Indian Reservation/Location

2. List below the SIP-approved or federally enforceable requirements from which you are seeking relief in the form of an AOC.

Device/Application No.	Explanation of Non-compliance	Applicable Rule	Date of Rule
Hydrogen Plant No. 2 (Unit 24) / AN 582081;	As TORC understands from AP, due to previous 24C-5 demister pad damage and unexpected degradation, Unit 24 currently is being operated at a hydrogen production rate that is below the required annual operating average rate for Rule 1189 annual compliance testing. AP advised TORC on April 13, 2026, that, to restore sufficient hydrogen production to allow the Rule 1189 annual compliance testing to take place, diagnostic/root cause analysis work will need to be done and repairs to the demisters (the expected	203(b)	1-5-1990 (12-3-2004 version pending approval);
		2004(f)(1);	4-6-2007;
		3002(c)(1)	11-5-10
		(as to Permit Condition S13.5)	
		1189(e)(1)	1-21-2000

Persons with disabilities may request this document in an alternative format by contacting the Clerk of the Board at 909-396-2500 or by e-mail at clerkofboard@aqmd.gov.

If you require disability-related accommodations to facilitate participating in the hearing, contact the Clerk of the Board at least five (5) calendar days prior to the hearing.

[ALL DOCUMENTS FILED WITH CLERK'S OFFICE BECOME PUBLIC RECORD]

	source of the run rate problem) will be needed, necessitating a unit shutdown. Because the root cause analysis and repair work cannot begin until mid-May (required for coordination with concurrent hydrotreater catalyst changeout) and may last until late June, this will make it impossible for AP (and TORC) to conduct the Rule 1189 annual compliance testing of Unit 24 on or before April 30, 2026, as required by Rule 1189(e)(1) and Condition S13.5. Thus, a variance will be necessary to conduct the source test of Unit 24 after April 30, 2026.		
--	--	--	--

EXAMPLE:

<i>Device/Application No.</i>	<i>Explanation of Non-compliance</i>	<i>Applicable Rule</i>	<i>Date of Rule</i>
D1	cannot use compliant printing ink	1130(c)	9-8-95
D17	cannot use compliant coating	1128(c)(5)(A)	2-7-92
D18	cannot test boiler for Rule 1146 CO compliance	1146 3004(a)(4)	5-12-94 8-11-95

3. List proposed AOC(s). Each AOC must contain the elements specified in Rule 518.2(g).

AOC #1 – Petitioner shall be subject to the following Alternative Operating Condition (“AOC”) defining alternative emission and operational requirements during the AOC period.

1. Petitioner shall inform South Coast Air Quality Management District compliance personnel by calling 1-800-CUT-SMOG (Attn: Inspector Deryck Roberts) to report a Variance Notification within seventy-two (72) hours following the start of the variance period.
2. Petitioner shall notify the South Coast Air Quality Management District compliance personnel by calling 1-800-CUT-SMOG (Attn: Inspector Deryck Roberts) forty-eight (48) hours prior to day of scheduled Rule 1189 source test.
3. During the variance period, every Wednesday by 5 pm, Petitioner shall electronically mail to Inspectors Deryck Roberts (droberts@aqmd.gov) the hourly average of the hydrogen production rate of the past week up to the conclusion time of the source test.
4. Petitioner shall conduct Rule 1189 source test within thirty (30) days of reaching targeted hydrogen production rate required to conduct source test.
5. Petitioner shall notify South Coast Air Quality Management District compliance personnel by calling 1-800-CUT-SMOG (Attn: Deryck Roberts) at least two (2) hours prior to the start of the Rule 1189 source test, but continuing to keep the inspector updated if the initial anticipated test start time changes.
6. Petitioner shall notify the Air Quality Inspector Deryck Roberts (droberts@aqmd.gov) via electronic mail, and by calling 1-800-CUT-SMOG (Attn: Deryck Roberts) to report Variance Notification within two (2) hours of achieving final compliance and completion of the AOC period.
7. Petitioner shall notify the Clerk of the Board in writing within five days of achieving final compliance as referenced in Condition 6.

8. In the event U.S. EPA objects to this AOC within the 45-day review period or in response to a timely citizen petition, this AOC shall be ineffective to protect Petitioner from U.S. EPA or citizen enforcement under the federal Clean Air Act for any federally enforceable requirement.
9. Petitioner shall pay all applicable fees to the Clerk of the Hearing Board or the variance shall be invalidated pursuant to Rule 303(k), except for excess emissions fees if applicable, which shall be paid within fifteen (15) days of notification in writing that the fees are due, unless otherwise ordered by the Hearing Board.

4. Explain how operation under the AOC will not result in the source discharging such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health, or safety of any such persons or to the public, or which cause, or have a natural tendency to cause, injury or damage to business or property

TORC does not anticipate that any of the Unit 24 demister pac replacement activities at the Torrance Refinery ("Refinery") under the AOC will cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or could endanger the comfort, repose, health, or safety of any such persons or the public, or cause, or have a natural tendency to cause, injury, or damage to business or property. Further, odorous substances are not anticipated to be released in any quantity sufficient for it to be detectable to the public.

5. Explain how the AOC will not violate any NSPS, NESHAP or other standard promulgated by the U.S. EPA under Sections 111 or 112 of the Clean Air Act, or any District rule that substitutes for such requirements, any standard or requirement under Titles IV or VI of the CAA or any requirements where an AOC cannot be granted.

The Refinery is subject to 40 CFR Part 60, Subpart A, which requires that Petitioner maintain and operate the facility, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions. The purpose of this AOC is to provide an extension of the current April 30, 2026, deadline to perform the Rule 1189 annual compliance test on the Unit 24 Hydrogen Plant, which has been delayed due to previous damage and unexpected degradation on the Unit 24C-5 demister pads, reducing Unit 24 run rate below the annual average. This test is necessary to confirm Unit 24's continued compliance with the Rule 1189 VOC limits. The test will cause no excess emissions, and granting a short extension to allow restoration of minimum hydrogen production is consistent with good air pollution control practice. In addition, replacement of the Unit 24 demister pads will restore hydrogen production and effectiveness for years to come, and is further consistent with good air pollution control practice. Accordingly, TORC will remain in compliance with 40 CFR 60 Subpart A throughout the AOC period.

While the Refinery also is subject to 40 CFR Part 60, Subparts J no excess emissions will occur during the AOC period. Thus, it is not expected that the unit would exceed any Subpart J limits due to the extension, and accordingly, TORC also will remain in compliance with these Subparts throughout the AOC period.

6. Explain how the excess emissions resulting from operation pursuant to the AOC would not, by themselves, cause an exceedance of a National Ambient Air Quality Standard

No excess emissions will occur during the AOC period. Thus, operation of the Refinery pursuant to the AOC will not result in an exceedance of any National Ambient Air Quality Standard.

7. Did the violation(s) result from a breakdown of technology? If Yes, explain below. If No, skip to No. 8.

(A). Explain how the breakdown could not have been prevented through careful planning or design.

The violations at issue here did not result from any breakdown of the Refinery's technology, but from unexpected degradation of Unit 24's demister pads in AP's operations. AP informs TORC that the degraded demister pads no longer allow Unit 24 to operate at its annual average hydrogen production rate, which is necessary for the Rule 1189 annual compliance test to be conducted. The pads are scheduled to be replaced in mid-May 2026, and the Refinery is requesting a short extension necessary to complete the replacement and conduct the Rule 1189 VOC annual compliance source test, which will be done without creating any excess emissions.

(B). Explain how the breakdown could not reasonably have been foreseen and avoided.

See response to 7(A) above. The unexpected degradation of the Unit 24 demister pads at AP did not result from any breakdown of the Refinery's technology. This outage could not have been anticipated or avoided, but the Refinery now must address its consequences by changing out the Unit 24 demister pads sooner than expected. This has created the need for the requested short extension of the Rule 1189 annual compliance test deadline.

(C). Explain how at all times the equipment, including air pollution control equipment, or processes were maintained and operated in a manner consistent with good practice for minimizing emissions.

See response to 7(A) above.

(D). Explain how repairs were or will be made in an expeditious fashion using off-shift labor and overtime, to the extent practicable, to ensure that such repairs are made as expeditiously as practicable

See response to 7(A) above. During the AOC period, the Refinery and AP plan to return to compliance by completing the Unit 24 demister pads replacement as safely and quickly as possible and then immediately scheduling and conducting the Rule 1189 annual compliance test once Unit 24 hydrogen production is restored and ramped up.

(E). Explain how the breakdown is not part of a recurring pattern indicative of inadequate design, operation, or maintenance.

See response to 7(A) above. The violations at issue here did not result as part of any recurring pattern indicative of inadequate design, operation, or maintenance by TORC of AP.

8. If the violation(s) will occur during startup or shutdown, explain how the frequency and duration of operation in startup or shutdown mode will be minimized to the maximum extent feasible.

N/A

9. Prepare an Excess Emission Calculation Attachment (Attachment I) for each device, or group of similar devices, that is or will be operating in non-compliance. **You should check with the Clerk of the Board prior to filing this petition to determine if there are any credits available in the AOC SIP allowance bank for the relevant pollutants. If no credits are available, you must demonstrate mitigation to zero excess emissions**

10. Identify below any Emission Reduction Credit (ERC) certificates that you will voluntarily relinquish during the term of the AOC in the event that the SIP allowance bank is depleted and is unavailable for use.

[YOU MAY ATTACH ADDITIONAL PAGES IF NECESSARY]

PAGE 4 OF 8

4880-1858-2308.v1

ERC Certificate Information

ERC No.	Pollutant	Pounds/Day	Pounds/Month (30 x lbs/day)
N/A	N/A	N/A	N/A

***If there are no AOC credits for the relevant pollutant(s) available in the SIP allowance bank, skip to No. 13.**

11. Explain how any emissions resulting from AOC and all other AOCs in effect will not exceed AOC credits held in the AOC Credit Bank.

N/A.

12. Based on the required attachments and calculations, summarize (in pounds) [1] the combined, monthly excess emissions, [2] mitigating emission reductions, and [3], ERC and/or emissions you are requesting to be withdrawn from the AOC SIP allowance bank, Charts 12(A) and 12 (B).

(A)

Pollutant	Month/Year (Example: 6/98)	[1] Excess Emissions From Attachments	[2] Mitigating Emission Reductions from Attachments	[3] ERC Emissions Relinquished
N/A				

- (B) Using previous Chart, calculate total emissions required from bank, if available.

Pollutant	Emissions (pounds) Required from Bank (+1-2-3)
N/A	N/A

13. Prepare a Mitigation Measure Emission Calculation Attachment (Attachment II) for emission reductions that are feasible, to the maximum extent possible, during the period of the AOC; or explain why mitigation measures are not feasible.

As discussed above, granting this AOC will not result in any excess emissions, as the Unit 24 Hydrogen Plant is neither a pollution control device nor adversely impacts emissions from other units at the Refinery.

I certify under penalty of law that I am the responsible official, or that official's designee, for this facility as defined in AQMD Regulation XXX and that based on information and belief formed after reasonable inquiry, the statements and information in this document and in all attachments are true, accurate and complete.

Dated: 4/22/26



Signature of Responsible Official

Jared Wimberley

Print Name of Responsible Official

Refinery Manager

Title of Responsible Official

Telephone: (310) 212-4500

ATTACHMENT I
EXCESS EMISSION CALCULATION

PETITIONER: TORRANCE REFINERY CORPORATION LLC

CASE NO: 6060-22

FACILITY ID: 181667

Device/Application No.(s) D151 / 582075; C1590 / 582076; C2314 / 582076

- A. List all SIP-approved, federally-enforceable, emission limits, permit conditions, and other requirements for which an AOC is sought:

Requirement Violated	Rule Violated	Rule Date
<p>As TORC understands from AP, due to previous 24C-5 demister pad damage and unexpected degradation, Unit 24 currently is being operated at a hydrogen production rate that is below the required annual operating average rate for Rule 1189 annual compliance testing. AP advised TORC on April 13, 2026, that, to restore sufficient hydrogen production to allow the Rule 1189 annual compliance testing to take place, diagnostic/root cause analysis work will need to be done and repairs to the demisters (the expected source of the run rate problem) will be needed, necessitating a unit shutdown. Because the root cause analysis and repair work cannot begin until mid-May (required for coordination with concurrent hydrotreater catalyst changeout) and may last until late June, this will make it impossible for AP (and TORC) to conduct the Rule 1189 annual compliance testing of Unit 24 on or before April 30, 2026, as required by Rule 1189(e)(1) and Condition S13.5. Thus, a variance will be necessary to conduct the source test of Unit 24 after April 30, 2026.</p>	<p>203(b), 1189(e)(1), 2004(f)(1) and 3002(c)(1) (as to Condition S13.5)</p>	<p>1-5-1990 (12-3-2004 version pending approval); 1-21-2000; 4-6-2007; 11-9-01</p>

- B. Explain below how you can reduce emissions in excess of the federally enforceable emission limits from the affected devices to the maximum extent feasible during the period of the AOC.

As discussed above, granting this AOC will not result in any excess emissions, as the Unit 24 Hydrogen Plant is neither a pollution control device nor adversely impacts emissions from other units at the Refinery.

C. List the emission limits, activity levels and/or operating conditions that you propose to comply with in lieu of the AQMD requirement(s).

The applicable conditions from the Supplement To Petition For Variance AOC #1, Question No. 3, are repeated here.

3. During the variance period, every Wednesday by 5 pm, Petitioner shall electronically mail to Inspectors Deryck Roberts (droberts@aqmd.gov) the hourly average of the hydrogen production rate of the past week up to the conclusion time of the source test.
4. Petitioner shall conduct Rule 1189 source test within thirty (30) days of reaching targeted hydrogen production rate required to conduct source test.
8. In the event U.S. EPA objects to this AOC within the 45-day review period or in response to a timely citizen petition, this AOC shall be ineffective to protect Petitioner from U.S. EPA or citizen enforcement under the federal Clean Air Act for any federally enforceable requirement.

D. Attach calculations of monthly excess emissions, done in accordance with Rule 518.2 (h)(1), from equipment subject to the AOC and summarize results here:

Pollutant	Month/Yr	Monthly Emissions (Pound)		
		[1] Based on Compliance with Rules, Existing Permit Conditions and Projected Activity Levels [518.2(h)(1)(A)]	[2] Based on Proposed Operating Conditions and Activity Levels [518.2(h)(1)(B)]	[3]* Excess Emissions (Difference)
N/A				

*Column 1 minus Column 2 = Column 3

If your proposed emission limits, operating conditions or activity levels will vary by calendar month, provide numbers for each month from the first day of non-compliance, or the day the AOC petition is submitted, whichever is later, until the last day of non-compliance.

E. Propose below the procedures you will use to monitor, record, and report excess emissions.

As discussed above, no excess emissions are expected during the variance and AOC period. However, the applicable reporting conditions from the Supplement To Petition For Variance AOC #1, Question No. 3, are repeated here.

1. Petitioner shall inform South Coast Air Quality Management District compliance personnel by calling 1-800-CUT-SMOG (Attn: Inspector Deryck Roberts) to report a Variance Notification within seventy-two (72) hours following the start of the variance period.
2. Petitioner shall notify the South Coast Air Quality Management District compliance personnel by calling 1-800-CUT-SMOG (Attn: Inspector Deryck Roberts) forty-eight (48) hours prior to day of scheduled Rule 1189 source test.
5. Petitioner shall notify South Coast Air Quality Management District compliance personnel by calling 1-800-CUT-SMOG (Attn: Deryck Roberts) at least two (2) hours prior to the start of the

Rule 1189 source test, but continuing to keep the inspector updated if the initial anticipated test start time changes.

6. Petitioner shall notify the Air Quality Inspector Deryck Roberts (droberts@aqmd.gov) via electronic mail, and by calling 1-800-CUT-SMOG (Attn: Deryck Roberts) to report Variance Notification within two (2) hours of achieving final compliance and completion of the AOC period.
7. Petitioner shall notify the Clerk of the Board in writing within five days of achieving final compliance as referenced in Condition 6.

During the AOC period, compliance with the applicable District Rules and Title V Permit limits will continue to be monitored and quantified consistently with and using the existing certified CEMS.

ATTACHMENT II

MITIGATION MEASURE EMISSION CALCULATION

PETITIONER: TORRANCE REFINERY CORPORATION

CASE NO: 6060-22

FACILITY ID: 181667

- A. Describe proposed mitigation measures that reduce emissions to maximum extent possible from equipment not in violation of an applicable requirement and the affected device/application no.(s):

As discussed above, granting this AOC will not result in any excess emissions, as the Unit 24 Hydrogen Plant is neither a pollution control device nor adversely impacts emissions from other units at the Refinery.

- B. List proposed operating conditions and activity levels for each of the above affected activities or device/application no(s).

The applicable conditions from the Supplement To Petition For Variance AOC #1, Question No. 3, are repeated here.

3. During the variance period, every Wednesday by 5 pm, Petitioner shall electronically mail to Inspectors Deryck Roberts (droberts@aqmd.gov) the hourly average of the hydrogen production rate of the past week up to the conclusion time of the source test.
4. Petitioner shall conduct Rule 1189 source test within thirty (30) days of reaching targeted hydrogen production rate required to conduct source test.
8. In the event U.S. EPA objects to this AOC within the 45-day review period or in response to a timely citizen petition, this AOC shall be ineffective to protect Petitioner from U.S. EPA or citizen enforcement under the federal Clean Air Act for any federally enforceable requirement.

- C. Attach calculations of monthly emission mitigations, done in accordance with Rule 518.2 (h)(2)(D), from equipment not in violation of an applicable requirement and summarize results here:

Pollutant	Month/Yr	Monthly Emissions (Pound)		
		[1] Baseline Emission Rate	[2] Post Reduction Emission Rate X Activity Level	[3]* Intra-Facility Emission Reduction (Difference)
N/A	N/A	N/A	N/A	N/A

*Column 1 minus Column 2 = Column 3

If emissions reductions you are committing to will vary by calendar month, provide numbers for each month from the first day of non-compliance, or the day the AOC petition is submitted, whichever is later, until the last day of non-compliance.

D. Propose below the procedures you will use to monitor, record, and report mitigating emission reductions.

As discussed above, no excess emissions are expected during the variance and AOC period. However, the applicable reporting conditions from the Supplement To Petition For Variance AOC #1, Question No. 3, are repeated here.

1. Petitioner shall inform South Coast Air Quality Management District compliance personnel by calling 1-800-CUT-SMOG (Attn: Inspector Deryck Roberts) to report a Variance Notification within seventy-two (72) hours following the start of the variance period.
2. Petitioner shall notify the South Coast Air Quality Management District compliance personnel by calling 1-800-CUT-SMOG (Attn: Inspector Deryck Roberts) forty-eight (48) hours prior to day of scheduled Rule 1189 source test.
5. Petitioner shall notify South Coast Air Quality Management District compliance personnel by calling 1-800-CUT-SMOG (Attn: Deryck Roberts) at least two (2) hours prior to the start of the Rule 1189 source test, but continuing to keep the inspector updated if the initial anticipated test start time changes.
6. Petitioner shall notify the Air Quality Inspector Deryck Roberts (droberts@aqmd.gov) via electronic mail, and by calling 1-800-CUT-SMOG (Attn: Deryck Roberts) to report Variance Notification within two (2) hours of achieving final compliance and completion of the AOC period.
7. Petitioner shall notify the Clerk of the Board in writing within five days of achieving final compliance as referenced in Condition 6.

During the AOC period, compliance with the applicable District Rules and Title V Permit limits will continue to be monitored and quantified consistently with and using the existing certified CEMS.

(E: HB:Petitions:AOC Supplement: Revised October 5, 2007)

