

James Chavez

From: Mohan Balagopalan
Sent: Thursday, May 7, 2026 1:44 PM
To: Clerk of Board
Subject: Re: In Re: Torrance Refining Co. (Case No. 6060-22) - Consent Filing

Hi,
Yes, to Consent Hearing.

Mohan Balagopalan

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From: Clerk of Board <Front_PC@aqmd.gov>
Sent: Thursday, May 7, 2026 11:42:39 AM
To: Mohan Balagopalan <mbalagopalan@aqmd.gov>
Cc: Clerk of Board <Front_PC@aqmd.gov>
Subject: FW: In Re: Torrance Refining Co. (Case No. 6060-22) - Consent Filing

From: McDonough, Michael S. [REDACTED]
Sent: Thursday, May 7, 2026 11:42 AM
To: Kathryn Roberts <KRoberts@aqmd.gov>; Clerk of Board <Front_PC@aqmd.gov>
Cc: [REDACTED]; [REDACTED]; Rubenstein, Debra
Subject: [EXTERNAL] RE: In Re: Torrance Refining Co. (Case No. 6060-22) - Consent Filing

Madame Clerk:

With respect to Comment #3, AP informs us:

Damage to the demister pads does not create a potential for excess VOC emissions from the deaerator vent. The demister pads are mechanical liquid-entrainment control devices designed to prevent liquid carryover and protect downstream purification equipment; they are not air pollution control devices and do not provide VOC capture, destruction, or removal.

The observed demister pad degradation affected unit operability by limiting achievable hydrogen production rates, but it did not increase VOC generation, alter the chemical composition of process streams, or impair the deaerator's normal stripping function.

Mike

Michael McDonough | Partner
Pillsbury Winthrop Shaw Pittman LLP
725 South Figueroa Street, 36th Floor | Los Angeles, CA 90017-5524

[REDACTED] | m [REDACTED]



From: McDonough, Michael S.
Sent: Thursday, May 7, 2026 11:31 AM
To: 'Kathryn Roberts' <KRoberts@aqmd.gov>; Clerk of Board <Front_PC@aqmd.gov>
Subject: RE: In Re: Torrance Refining Co. (Case No. 6060-22) - Consent Filing

Madame Clerk: We would join in this answer, including the correction of the start of the variance period to May 12, 2026. On Comment #3, we are working with AP to get you an answer ASAP on that.

Mike

From: Kathryn Roberts <KRoberts@aqmd.gov>
Sent: Thursday, May 7, 2026 9:07 AM
To: Clerk of Board <Front_PC@aqmd.gov>
Cc: McDonough, Michael S. <michael.mcdonough@pillsburylaw.com>
Subject: RE: In Re: Torrance Refining Co. (Case No. 6060-22) - Consent Filing

Dear Clerk of the Board,

The District provides the below responses in red to the Board Members questions and comments.

Questions

1. What is the status of the Change of Operator from Torrance Refining to Air Products West Coast Hydrogen (AP) and the Title V permit for AP? At the last hearing in 2023, we were informed that it was pending policy decisions.
The draft Title V permit and SOB are being finalized and expected to be submitted to EPA next week for their 45-day review as Minor Permit revision. Although change of operator is normally an administrative permit revision per Rule 3000(b)(1)(B), to process these change of operator applications, we had to add conditions to clarify how the emissions from heater 24F-1 (device D50) and gas turbine 24J-1 (device D926 on TORC's permit) will be apportioned for each facility, which elevated it to a Minor Permit Revision.
2. How is Rule 209 being addressed? It states that "When equipment which has been granted a permit is altered, changes location, or no longer will be operated by the permittee, the permit shall become void". Air Products has submitted Change of Ownership applications. The District's interpretation is that this facility is allowed to operate under the terms of the previous permit until the District issues them their own stand-alone permit. The District also refers the Hearing Board to testimony from the District's Sr. Engineering and Permitting Manager Bhasker Chandan, who addressed this issue in a prior hearing regarding the same facility (Case No. 6060-17) [please see testimony starting at 53:50 [here](#)].
3. I suggest adding language stating that AP is an Interim TV facility and has an application shield pursuant to Rule 3002(b). Also, to list the ID number for the AP facility and TV application number(s) and that the TV permit for TORC includes the permit for AP as a workaround until the AP TV permit is issued, and the TV responsible person for AP is xxxxxxxx for any questions, violation notices, etc.
AP is not an applicant for a variance, and is not before the Hearing Board as a party. The District respectfully notes that the Hearing Board does not have jurisdiction to enter an order requiring actions by a third party not before the Board.

Comments.

1. In the proposed Findings and Decision document, Conclusion and Order, Paragraph A states that the Variance period commences May 1, 2026. My understanding is that any Hearing Board decision is not granted retroactively and is based on the hearing date or another date beyond the hearing date.
The District agrees with this comment, and believes this is the result of inadvertent error. The variance should run from May 12, 2026 (the date of the hearing) if the Board grants the variance.
2. Condition 4 states that a make-up source test shall be conducted. Is there going to be a previous test prior to the make-up test?
Condition 4 refers to the delayed source test as make-up test, because it is for making up the test that was due in April. It is not an additional test, and there is not going to be any test prior to the make-up test.
3. If the demister pad is degraded and damaged, is there not a potential for excess VOC emissions?
The District defers this question to the Facility.

Respectfully Submitted,
Kathryn Roberts

Kathryn Roberts, Esq.
Principal Deputy District Counsel
Office of the General Counsel
South Coast Air Quality Management District
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From: Clerk of Board <Front_PC@aqmd.gov>
Sent: Wednesday, May 6, 2026 1:03 PM
To: Kathryn Roberts <KRoberts@aqmd.gov>; Michael McDonough [REDACTED] >
Cc: Clerk of Board <Front_PC@aqmd.gov>
Subject: FW: In Re: Torrance Refining Co. (Case No. 6060-22) - Consent Filing

From: Mohan Balagopalan <>
Sent: Wednesday, May 6, 2026 12:56 PM
To: Clerk of Board <Front_PC@aqmd.gov>
Subject: Re: In Re: Torrance Refining Co. (Case No. 6060-22) - Consent Filing

Hi,
I have a few questions and comments.

1. What is the status of the Change of Operator from Torrance Refining to Air Products West Coast Hydrogen (AP) and the Title V permit for AP? At the last hearing in 2023, we were informed that it was pending policy decisions.

2. How is Rule 209 being addressed? It states that "When equipment which has been granted a permit is altered, changes location, or no longer will be operated by the permittee, **the permit shall become void**".
3. I suggest adding language stating that AP is an Interim TV facility and has an application shield pursuant to Rule 3002(b). Also, to list the ID number for the AP facility and TV application number(s) and that the TV permit for TORC includes the permit for AP as a workaround until the AP TV permit is issued, and the TV responsible person for AP is xxxxxxxx for any questions, violation notices, etc.

Comments.

1. In the proposed Findings and Decision document, Conclusion and Order, Paragraph A states that the Variance period commences May 1, 2026. My understanding is that any Hearing Board decision is not granted retroactively and is based on the hearing date or another date beyond the hearing date.
2. Condition 4 states that a make-up source test shall be conducted. Is there going to be a previous test prior to the make-up test?
3. If the demister pad is degraded and damaged, is there not a potential for excess VOC emissions?

Thank you for your responses to my question.

Mohan Balagopalan

From: Clerk of Board <Front_PC@aqmd.gov>
Sent: Tuesday, May 5, 2026 2:07 PM
Cc: Clerk of Board <Front_PC@aqmd.gov>
Subject: FW: In Re: Torrance Refining Co. (Case No. 6060-22) - Consent Filing

Good afternoon,

The parties are requesting Torrance #6060-22 to be placed on consent calendar. Attached are the documents for review.



Clerk of the Boards
South Coast AQMD
T: (909) 396-2500
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From: Kathryn Roberts <KRoberts@aqmd.gov>
Sent: Tuesday, May 5, 2026 1:57 PM
To: Clerk of Board <Front_PC@aqmd.gov>
Cc: [REDACTED]
Subject: In Re: Torrance Refining Co. (Case No. 6060-22) - Consent Filing

Dear Clerk of the Board,

Attached for filing in the above referenced matter, scheduled for hearing May 12, 2026, please find:

1. Stipulation for Consent Calendar
2. [Proposed] Findings and Decision for a Short Variance and AOC
3. Declaration of Valerie Tse in Support of Short Variance and AOC

Pursuant to Hearing Board Rule 2, undersigned counsel will provide 8 hard copies of these documents in advance of the hearing.

Respectfully Submitted,

Kathryn Roberts

Kathryn Roberts, Esq.
Principal Deputy District Counsel
Office of the General Counsel
South Coast Air Quality Management District
Phone: 909.396.2734
Email: kroberts@aqmd.gov

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