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Torrance Refining Company LLC

BEFORE THE HEARING BOARD
OF THE
SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

In the Matter of

TORRANCE REFINING COMPANY, LLC
(Facility ID No. 181667)

Petitioner,

Case No. 6060-22

**DECLARATION OF VALERIE TSE IN
SUPPORT OF TORRANCE REFINING
COMPANY'S PETITION FOR SHORT
VARIANCE AND ALTERNATIVE
OPERATING CONDITIONS**

Hearing Date: May 12, 2026
Time: Consent Calendar

I, Valerie Tse, hereby declare:

1. I am the Process Safety and Environmental Manager for Torrance Refining Company, LLC's ("TORC") Torrance, California petroleum refinery, located at 3700 West 190th Street, Torrance, California 90504 (the "Refinery"). I have personal knowledge of the facts stated herein and, if called as a witness, could and would testify competently thereto under oath.
2. I am familiar with the contents of the Petitions for Short Variance ("Variance") and Alternative Operating Condition ("AOC") ("collectively, "Petitions") filed by TORC in this case on April 22, 2026.
3. This Declaration is submitted pursuant to District Hearing Board ("Board") Rule 4 in support of TORC's Petitions, and for its consideration on the Board's Consent Calendar.

4. TORC owns and operates the Refinery, which is in the business of petroleum refining. 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.

5. TORC owns and operates the Refinery, but the on-site Hydrogen Plant at issue in this petition, commonly referred to as Unit 24, is currently 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 remains under TORC's Title Facility Permit. TORC has coordinated with AP on all matters associated with this Variance Petition and the accompanying Alternative Operating Condition ("AOC") Petition.

6. A copy of the relevant sections of the Refinery's Permit to Operate ("Permit") is attached to the Variance Petition as Exhibit 1.

7. TORC has filed the Petitions to seek relief to allow a short extension of the present April 30, 2026, deadline to perform and report the results of the annual VOC compliance testing required by District Rule 1189 on the Unit 24 Hydrogen Plant (Process 6, System 2 in the permit).

8. The extension is necessary because, 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 or early July, 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.

9. Condition S13.5 of the Refinery's Title V Permit, 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."

10. District Rule 1189 requires annual source testing of hydrogen plant process vents to demonstrate compliance with the Rule's VOC limits. Under Rule 1189 Attachment A, this source testing "must be conducted under normal operating conditions," and "hydrogen production must not be less than the annual operating hourly average."

11. TORC 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 at the Refinery. Such hydrogen supply is critical to removing sulfur from crude feedstocks as they are refined into low-sulfur transportation fuels.

12. AP and the Refinery anticipate that diagnosis and repair of Unit 24 demister damage and unit degradation, the subsequent start-up, and reaching above annual operating average cannot be completed until late June 2026 or early July 2026, meaning that it will be beyond their reasonable control to comply with Rule 1189 and Permit Condition S13.5 unless a variance is granted allowing for an extension to conduct the compliance testing after April 30, 2026.

13. As a result, TORC also expects non-compliance with District Rules 203(b), 2004(f)(1) and 3002(c), which generally require compliance with all permit conditions.

14. No excess emissions will be generated during the variance period, and the Unit 24 Hydrogen Plant is not an emissions control device.

15. The Refinery and AP expect that, after unit diagnosis, repairs and startup, Unit 24 should be able to reach the hydrogen production rate necessary to allow Rule 1189 compliance testing hopefully by later June or early July, but in any event, no later than July 29, 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.

16. Operation under the requested relief in the Petitions is not expected to result in a violation of Health and Safety Code 41700 or any other applicable emissions limits.

17. Denial of the Petitions would cause irreparable harm to TORC and to California's citizens, with no corresponding benefit in emissions reduction, in that (a) there are no excess emissions to "reduce" if this variance is denied, (b) denial of the Petitions would deny TORC the additional time necessary to conduct an annual source test necessary to show Unit 24's compliance with important VOC emission limits in District Rules, and (c) forcing TORC instead to permanently shut down Unit 24 in an attempt to maintain strict compliance would require the refinery to operate at a minimum rate for the foreseeable future due to lack of necessary hydrogen and steam supply, resulting in a reduction of supply of gasoline, diesel, jet fuel and other transportation fuels to the California market and to the citizens who rely on those transportation fuels.

18. TORC has considered curtailing or terminating operations in lieu of obtaining the requested Variance and AOC relief, but no amount of curtailment will allow the Rule 1189 compliance testing to occur sooner. Indeed, operations already will be curtailed due to the temporary shutdown of Unit 24 for 1-2 months to allow safe worker access for diagnostic and repair work. However, this curtailment will not allow the source testing to be completed before the April 30, 2026, deadline for testing and reporting annual source test results to the District, requiring the parties to seek this short variance.

19. As discussed above, if the variance is granted, no excess emissions will occur during the variance and AOC period, as the extension of the Rule 1189 source testing to Unit 24 does not impact the operation of any pollution control device nor adversely impact 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.

20. TORC and the District have agreed to a set of proposed Variance Conditions, which are attached to the Petition as Exhibit 4.

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

Executed this 4th day of May 2026, in the County of Los Angeles, State of California.



Valerie Tse