

Dear Honorable Board:

My name is Catherine Leys and I am co-founder of Families Lobbying Against Refinery Exposures ("FLARE"). FLARE is a grassroots organization formed following the April 2016 AQMD Board Hearing on the Torrance Refinery ("Refinery") explosion and re-start. FLARE is growing rapidly. It currently consists of nearly 2,500 community members and reaches up to 22,000 each week.

We thank you for your attention to the ongoing issues occurring at Torrance Refinery which greatly impact the community. A 10,000 foot overview of recent events at the Refinery follows.

1. On April 11, 2014, Exxon and SCAQMD entered into a negotiated "Final Executed Settlement Agreement", under which Exxon committed to approximately \$22.6 million in relief. (Exhibit One, Final Executed Settlement Agreement). The agreement details the Refinery's failure to meter approximately half of the vent gas feeding its flares over many years. Under paragraph 3(b)(ii) of the agreement, the Refinery agreed to spend \$7.25 million of the \$22.6 million in relief on flare mitigation projects.
2. On February 18, 2015, the well-documented explosion at the Refinery occurred, blanketing the surrounding community in industrial ash. The Chemical Safety Board reports there was a near miss on a tank containing tens of thousands of pounds of MHF. (Exhibit Two, "Chemical Safety Board Press Release"). My children, and many neighborhood children, were out playing at local playgrounds and were at school the morning of the explosion and ash began raining from the sky. Some members have reported to me that their kids asked them why it was "snowing". I can speak from experience that there was a delay in communicating any alert or shelter-in-place directive to the public via the local emergency alert system.
3. On April 29, 2016, the SCAQMD assessed its Rule 1118 cap of \$4 million against the Torrance Refinery for sulfur dioxide emissions. (Exhibit Three, "Sulfur Dioxide Exceedance Letter").
4. A June 24, 2016 email attached as Exhibit Four confirms that rather than use the \$7.25 million in flare mitigation project money set aside under the Final Executed Settlement Agreement (detailed in paragraph one above) to perform flare mitigation projects, Exxon instead elected to directly pay the \$7.25 million to SCAQMD under a fallback clause.
5. On October 13, 2016, an SCAQMD compliance officer issued a Notice of Violation to the Refinery for an "alleged public nuisance" related to a black smoke flaring event following a power supply interruption. (Exhibit Five, "Stipulated Order of Abatement"). Paragraphs 8 through 10 of the Stipulated Order of Abatement detail some of the flaring events related to power interruptions. Despite repeated power interruption flaring events dating back to at least November 2010, it was not until February 2017 that the Refinery finally entered into the Stipulated Order of Abatement to begin a review and upgrade of the Refinery's electrical supply. The initial review and upgrade is scheduled to take approximately 2.5 years, with a full solution taking approximately 9 years.

6. On November 15, 2016, a fire broke out at the Refinery. Initial reports indicate that the fire was near the alkylation unit, which is where MHF is utilized at the Refinery. (<http://ktla.com/2016/11/15/firefighters-battle-blaze-at-torrance-refinery/> ).
7. On January 4, 2016, an unidentified quantity of Naptha/sulfur was released by the Refinery into nearby neighborhoods. (Exhibit Six, Hazardous Materials Spill Report). (<http://www.dailybreeze.com/business/20170105/smelly-chemical-release-fromtorrance-refinery-lingers-on-minds-of-residents>).
8. On February 1, 2017, a fire broke out at the Refinery's tank farm, reportedly in a pool of water. (<http://www.dailybreeze.com/general-news/20170201/firefighters-smotherblaze-in-torrance-refinery-tank-farm>).
9. On February 18, 2017, on the two year anniversary of the 2015 explosion, another fire broke out at the Refinery. (<http://www.dailybreeze.com/business/20170218/fireerupts-at-torrance-refinery-just-hours-before-protest-rally>).
10. SCAQMD is currently working on an amended Rule 1118 to further curb sulfur oxide emissions. Recently, on February 28, 2017, SCAQMD reported estimated sulfur oxide emissions at the Refinery of approximately 487 tons for 2016. (see page 19 of AQMD's "First Working Group" presentation at: <http://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1118/PAR1118WG-1.pdf?sfvrsn=4> ). This preliminary number exceeds the total emissions from the six other refineries within SCAQMD's jurisdiction combined. If this number holds, another \$4 million Rule 1118 fine is possible.
11. In addition, there has been a crane collapse at the Refinery and multiple citations by OSHA against the Refinery over the last few years.

Submitted this 31st Day of March, 2017.  
Catherine Leys