



Torrance Refining Company LLC
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April 7, 2020

VIA E-MAIL AND OVERNIGHT MAIL

Wanye 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 first quarter 2020 update regarding the voluntary modified hydrogen fluoride (“MHF”) alkylolation 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. TORC is closely monitoring Engineering, Construction, and Materials availability in connection with the COVID-19 pandemic, and will notify the South Coast AQMD of any potential impacts that could result in schedule delays.

Safety Enhancements	First Quarter 2020 Status
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"> • Funding approved for Detailed Engineering and Procurement • Detailed engineering in progress • Underground verifications for foundation design is in progress • Enhancement currently on schedule for implementation in 2021

Safety Enhancements	First Quarter 2020 Status
Settler Area Water Mitigation Dome and Curtain Settler Area Enhanced HF/MHF Detection System	<ul style="list-style-type: none">• Funding approved for Detailed Engineering and Procurement• Detailed engineering in progress• Underground verifications for piping and electrical design is in progress• Specialty equipment supplier selected• Enhancement currently on schedule for implementation in 2021

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
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Michael Krause, South Coast AQMD