

1 OFFICE OF THE GENERAL COUNSEL
SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
2 KURT R. WIESE, State Bar No. 127251
GENERAL COUNSEL
3 E-mail: kwiese@aqmd.gov
KARIN C. MANWARING, State Bar No. 226585
4 SENIOR DEPUTY DISTRICT COUNSEL
Email: kmanwaring@aqmd.gov
5 DAPHNE P. HSU, State Bar No. 247256
SENIOR DEPUTY DISTRICT COUNSEL
6 Email: dhsu@aqmd.gov
21865 Copley Drive
7 Diamond Bar, California 91765
Tel: (909) 396-3400 • Fax: (909) 396-2481
8
9 Attorneys for Petitioner
South Coast Air Quality Management District

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12 **BEFORE THE HEARING BOARD OF THE**
13 **SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT**
14

15 **In the Matter of**

16 SOUTH COAST AIR QUALITY
17 MANAGEMENT DISTRICT,

18 Petitioner,

19 v.

20 TORRANCE REFINING COMPANY LLC
[Facility ID No. 181667],

21 Respondent.

Case No. 6060-5

**STIPULATED ORDER FOR
ABATEMENT AND FINDINGS AND
DECISION OF THE HEARING BOARD**

Rule 402 and California Health and Safety Code
Section 41700

Hearing Dates: February 15 & 16, 2017
Time: 9:00 a.m.
Place: SCAQMD
21865 Copley Drive
Diamond Bar, CA 91765

1 **FINDINGS AND DECISION OF THE HEARING BOARD**

2 This petition for an Order for Abatement was heard on February 15 & 16, 2017, pursuant to
3 notice and in accordance with the provisions of California Health and Safety Code Section 40823
4 and District Rule 812. The following members of the Hearing Board were present:
5 Edward Camarena, Chair; Julie Prussack, Vice Chair; Patricia Byrd; Hon. Nate Holden; and
6 Roger L. Lerner, M.D. Petitioner, Executive Officer of the South Coast Air Quality Management
7 District, (hereinafter referred to as “District” or “Petitioner”), was represented by Daphne Hsu,
8 Senior Deputy District Counsel, and Karin Manwaring, Senior Deputy District Counsel.
9 Respondent Torrance Refining Company LLC, a Delaware limited liability company, (hereinafter
10 referred to as “Respondent” or “TORC”), was represented by Michael McDonough of Pillsbury
11 Winthrop Shaw Pittman LLP. The public was given the opportunity to testify. The matter was
12 submitted and evidence received. The Hearing Board finds and decides as follows:

13 **FINDINGS OF FACT**

14 1. Petitioner is a body corporate and politic established and existing pursuant to Health
15 and Safety Code sections 40000, *et seq.* and sections 40400, *et seq.*, and is the sole and exclusive
16 local agency with the responsibility for comprehensive air pollution control in the South Coast
17 Basin.

18 2. Respondent is in the business of petroleum refining and owns and operates the
19 refinery located at 3700 W. 190th Street, Torrance, California 90504 (the “Facility” or “Refinery”),
20 with Facility ID no. 181667. The Respondent’s Facility is within the District’s jurisdiction and
21 subject to the District’s regulations. Respondent acquired the Refinery from ExxonMobil Oil
22 Corporation on July 1, 2016. The Refinery is a large industrial complex, sitting on approximately
23 750 acres. It is bordered by a residential community to the north and a residential street to the
24 south; otherwise, the Refinery is surrounded by commercial and industrial areas.

25 3. Respondent operates multiple process units within the Refinery including: crude
26 distillation, fluid catalytic cracking, alkylation, gas production, and steam production. The Facility
27 is equipped with a flaring system that is used to depressurize process units in the event of an
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1 emergency. Flaring is considered an essential safety feature at a refinery.

2 4. The Refinery receives power from Southern California Edison (“SCE”). SCE owns
3 and operates much of the electrical infrastructure that delivers power to Refinery units, including
4 two 66 kV substations (i.e., “Compress” and “MobilOil”), and 12 kV and 16 kV electrical system
5 within the Refinery. SCE’s La Fresa Substation serves the Refinery and local community of
6 approximately 160,000 customers in five cities. The La Fresa Substation’s incoming power is 220
7 kilovolts (“kV”) and outgoing power to the Refinery is at 66 kV and to other customers at lower
8 voltages. There are two substations (Compress and MobilOil) serving the Refinery from the La
9 Fresa Substation. At the La Fresa Substation, the Refinery is on the A-Bus, which also serves
10 approximately 60,000-70,000 customers.

11 5. **Health & Safety Code Section 41700 and District Rule 402** state, “a person shall
12 not discharge from any source whatsoever such quantities of air contaminants or other material
13 which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to
14 the public, or which endanger the comfort, repose, health or safety of any such persons or the
15 public, or which cause, or have a natural tendency to cause, injury or damage to business or
16 property.”

17 6. District Rule 1118, last amended November 4, 2005, applies to all flares used at
18 petroleum refineries, sulfur recovery plants and hydrogen production plants. It is intended to
19 monitor and record data on refinery and related flaring operations, and to control and minimize
20 flaring and flare related emissions. It expressly states that “provisions of this rule are not intended
21 to preempt any petroleum refinery, sulfur recovery plant and hydrogen production plant operations
22 and practices with regard to safety.” Flaring is a safety feature at refineries and the District, by this
23 petition, is not alleging that TORC violated District Rule 1118.

24 7. Flaring events followed power disruptions on SCE’s electrical system outside the
25 Refinery on at least three occasions in 2016: in March, September, and October. TORC was the
26 operator of the Refinery during only the September and October events. No flaring events
27 following power disruptions have been reported at the Refinery thus far in 2017.

1 8. On March 16, 2016, a Mylar balloon came in contact with a SCE subtransmission
2 power line located outside the Refinery and caused a system disruption that resulted in a flaring
3 event at the Refinery while the Refinery was owned and operated by ExxonMobil. The District did
4 not allege a violation of Health & Safety Code section 41700 or District Rule 402 following this
5 event.

6 9. On September 19, 2016, the Refinery again experienced a power supply interruption
7 due to event on SCE's electrical system outside the Refinery. The power supply interruption
8 resulted when SCE experienced an insulator arc-over on its 66kV system (called a "flashover")
9 outside the Refinery during a heavy fog. The flashover directly impacted the Refinery's incoming
10 66kV power feed. The District did not allege a violation of Health & Safety Code section 41700 or
11 District Rule 402 following this event.

12 10. On October 11, 2016, the Refinery again experienced a power supply interruption.
13 The power supply interruption resulted when SCE experienced a sudden and unexpected power
14 supply interruption outside the Refinery from SCE's La Fresa substation due to an SCE wiring
15 error. The Refinery was without power from SCE for a total of 26 minutes.

16 11. A District compliance officer issued Notice of Violation P63409 on October 13,
17 2016, to TORC for alleged violations of District Rule 402 and Health & Safety Code section
18 41700, for the alleged public nuisance that resulted from the flaring event that occurred on October
19 11, 2016.

20 12. As a result of the October 11, 2016, power interruption, TORC's safety systems
21 were activated and power to all major process units had been lost. To avoid atmospheric releases
22 and potential process safety issues, TORC diverted process gases in Refinery process units and
23 equipment to the Refinery's flares, 65F-3 and 65F-4.

24 13. On October 11, 2016, because of the impact of the SCE power interruption on the
25 Refinery, the City of Torrance issued an emergency notification at about 6:45 a.m. directing people
26 who live near the Refinery to shelter in place. "Stay inside buildings, shut all doors and windows,
27 turn off air conditioners, and turn off all air handling systems," the alert stated. The order lasted
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1 nearly thirty minutes and was lifted at 7:12 a.m.

2 14. Due to the volume of process gases being flared and the loss of the Refinery's steam
3 system due the SCE power interruption, the flaring resulted in black smoke that could be seen from
4 miles away. Respondent typically uses steam to prevent black smoke when flaring, however, the
5 loss of power supply from SCE prevented the Refinery from generating steam, which resulted in
6 the black smoke.

7 15. As a result of the SCE power outage, Respondent's Flare 65F-3 flared for more than
8 four hours on the morning of October 11, 2016. The flare opacity exceeded 20 percent during
9 flaring. That morning, the District conducted a visible emissions evaluation ("VEE") pursuant to
10 United States Environmental Protection Agency ("EPA") Method No. 9 on Flare 65F-3 to evaluate
11 the opacity of the black smoke plume being emitted at that time. The District concluded that the
12 approximate density of the plume at 7:50 a.m. on October 11, 2016 was a shade corresponding to
13 Ringelmann No. 4 (i.e., at least 80 percent opaque).

14 16. Respondent's Flare 65F-4 flared over the course of at least two days, but did not
15 result in excess opacity or black smoke.

16 17. The District received a total of sixty-seven complaints related to the flaring event.

17 18. Emissions at the Refinery resulting from the SCE power outage occurred entirely on
18 October 11 through 13. Allowable and Rule 1118-exempt emissions from the flares were 56.995
19 million scf of gases; 66,054 pounds of SOx;¹ and 2,032 pounds of VOC. In addition, during this
20 time, the Refinery's two vapor recovery compressors shut down as a result of the power outage,
21 and as a result, more than 2.1 million standard square cubic feet ("scf") of excess gases of flow was
22 not recovered, resulting in excess emissions of 3,831 pounds of excess sulfur oxides ("SOx"), 45
23 pounds of particulate matter ("PM"), 263 pounds of excess nitrogen oxides ("NOx"), 259 pounds of
24 excess volatile organic compounds ("VOC"); and 1,433 pounds of excess carbon monoxide
25 ("CO").

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27 ¹ TORC anticipates that the SOx emissions numbers from the flares will ultimately be fewer than
28 17,000 pounds, when using an alternative method of reporting.

1 19. Although flaring is considered a safety feature at refineries, the District seeks to
2 minimize flaring when possible due to emissions and the potential for opacity concerns. Some
3 flaring events at TORC's Refinery are caused by SCE power interruptions. The District alleges
4 that such flaring events have the potential to recur, and that such flaring events may have the
5 tendency to cause injury, detriment, nuisance, or annoyance to a considerable number of persons
6 and to the public, and that such discharges further endanger the comfort, repose, health and safety
7 of people and the public.

8 20. In response to the recent SCE power outages, TORC and SCE have been working
9 together on a proposal to minimize the potential for future power supply interruptions from SCE's
10 electrical system. SCE and TORC propose to work together to build a 220 kV service and a new
11 SCE switching station located on TORC property and exclusively serving the Refinery. TORC
12 also proposes to replace and upgrade its existing electrical distribution network within the Refinery
13 (collectively, "220 kV Proposal").

14 21. TORC and Edison are providing the District with further information on the 220 kV
15 Proposal to allow the District to further understand how the 220 kV Proposal will improve
16 electrical reliability.

17 22. Consistent with the terms and conditions ordered of TORC below, TORC agrees to
18 take steps within the Refinery to improve its ability to cope with electrical power interruptions from
19 SCE and reduce flaring, including but not limited to, identifying and evaluating feasible and cost-
20 effective enhancements, upgrades, or improvements to its critical utility systems, and ensuring its
21 uninterruptible power supply ("UPS") systems are maintained and operable. TORC further agrees
22 to conditions that address training related to response to loss of power and enhanced public
23 outreach regarding its planning and progress of its 220 kV Proposal.

24 23. The parties have stipulated to the issuance of this Order for Abatement, pursuant to
25 Health and Safety Code Section 42451(b).

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1 **CONCLUSIONS**

2 1. The parties have jointly agreed to enter into this Stipulated Order for Abatement out
3 of a desire to improve the reliability of electricity at the Refinery and to reduce the consequences
4 of any SCE power outages.

5 2. This Stipulated Order for Abatement is not and does not act as a variance.

6 3. The issuance of this Stipulated Order for Abatement, upon a fully noticed hearing,
7 will not constitute a taking of property without due process of law.

8 4. The issuance of this Stipulated Order for Abatement is not expected to result in the
9 closing or elimination of an otherwise lawful business.

10 **ORDER AND CONDITIONS**

11 THEREFORE, subject to and based on the aforesaid Findings of Fact, Conclusions, and
12 additional evidence and testimony, and good cause appearing, this Board orders Respondent to
13 refrain from any operation of the Torrance Refinery that would result in violation of District Rule
14 402 and California Health and Safety Code Section 41700 as a result of an SCE power outage, or in
15 the alternative, comply with the actions and conditions set forth below:

- 16
- 17 1. Respondent shall meet the following conditions:
- 18 a. Comply with all applicable California Electrical Code and industry reliability
19 standards in designing its portions of the 220kV Proposal;
- 20 b. Within 180 days from the issuance of this Order, model for its portions of its 220 kV
21 Proposal, using electrical modeling tools such as SKM Systems Analysis, Inc.
22 (“SKM”) or electrical transient analysis program (“ETAP”) software, and provide
23 the model results to the District within 30 days of completion;
- 24 c. Within 180 days from the issuance of this Order, estimate the predicted mean time
25 between failure (“MTBF”) and mean time to repair (“MTTR”) by asset type (i.e.,
26 between failure (“MTBF”) and mean time to repair (“MTTR”) by asset type (i.e.,
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1 transformers, switchgears, cables, etc.), and provide its estimate to the District within
2 30 days of completion; and

3 d. Design its portions of its 220 kV Proposal such that there are no single points of
4 failure.

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6 2. Respondent shall, within 60 days from the issuance of the Order, provide to the District a
7 written communications protocol between itself and SCE that covers the following topics:

8 a. For the 220kV Proposal, Respondent shall take all reasonable steps to ensure weekly
9 meetings and/or telephone conferences continue until the Respondent and SCE have
10 agreed to the design, construction schedule, and received requisite regulatory
11 approvals for SCE's portion of the project;

12 b. Respondent shall seek SCE's agreement to provide at least 24-hour advance
13 notification to Respondent of any SCE electrical system work, including upgrades,
14 maintenance, and/or new facilities that may have the potential to limit or impact
15 Respondent's Torrance Refinery operations;

16 c. Respondent shall provide at least 24-hour advance notification to SCE of any
17 maintenance at its Torrance Refinery that may have the potential to limit SCE's
18 electrical system stability and operations;

19 d. Respondent shall provide the names, telephone numbers, and e-mail addresses of the
20 SCE and Respondent contacts that should be notified; and

21 e. Respondent shall provide to the District Respondent's and SCE's contacts who shall
22 manage and coordinate the dissemination of emergency notices, who is responsible
23 for acting upon the information regarding an emergency, and what actions are
24 required to be taken, in the event of an emergency.
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1 3. Respondent shall, within 270 days from the issuance of this Order, conduct and complete an
2 evaluation of the Torrance Refinery's safety critical devices to determine which safety critical
3 devices rely solely on electrical power with no UPS backup.

4 a. Respondent shall, within 30 days of completing this evaluation, provide this
5 evaluation to the District.

6 b. Respondent shall, within 365 days, from completing the evaluation in 3.a above, for
7 UPS installation work that does not require a permit modification or permit, or
8 turnaround, install the identified UPS on those safety critical devices without backup.
9 Respondent shall commence construction within 45 days of receipt of all necessary
10 equipment for each UPS installation.

11 c. Respondent shall, within 30 days from the installation of all UPS on safety critical
12 devices without backup UPSs in 3.b above, provide documentation to the District of
13 these UPS installations.

14 d. For those UPS installations identified in 3.a above that require a permit modification
15 or permit, Respondent shall submit the appropriate applications for the identified
16 UPSs within 90 days from the completion of the evaluation in 3.a. Within 365 days
17 from the issuance of such permit modification or permit, if a turnaround is not
18 required, Respondent shall complete the UPS installation work. Respondent shall
19 commence construction within 45 days of receipt of all necessary equipment or
20 issuance of a permit modification or permit, whichever is later.

21 e. Respondent shall, within 30 days from the installation of all UPS on safety critical
22 devices without backup UPSs in 3.d above, provide documentation to the District of
23 these UPS installations.

- 1 f. For those UPS installations identified in 3.b above that require a turnaround,
2 Respondent shall install these identified UPSs at the next scheduled turnaround for
3 its associated equipment or process unit.
- 4 g. Respondent shall, within 30 days from the installation of all UPS on safety critical
5 devices without backup UPSs in 3.f above, provide documentation to the District of
6 these UPS installations.
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8 h. Upon receipt of the permit modification or permit application from Respondent for
9 3.d and/or 3.f above, the District will endeavor to use its best efforts to review and
10 issue any required permit modification or permit in an expedited manner.

11 4. Respondent shall, within the time periods provided below, conduct and complete an
12 evaluation of the Torrance Refinery's critical utility systems to determine potential feasible and
13 cost-effective enhancements, upgrades, or improvements to these systems that will enable these
14 systems to remain operable as long as possible during an SCE electrical power outage to minimize
15 flaring during such an SCE power outage, and provide the evaluation to the District within 30 days
16 of completion.

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18 a. In the evaluation, the Respondent shall evaluate the following Torrance Refinery
19 critical utility systems within the time periods provided below:

- 20 i. Within 270 days from the issuance of this Order, evaluate:
- 21 • Steam systems, including but not limited to boilers, critical steam
22 turbines, and flare quenching systems;
 - 23 • Boiler feed water system;
 - 24 • Instrument air system; and
 - 25 • Flare knockout pots draining systems.

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27 ii. Within 365 days from the issuance of this Order, evaluate:

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- Nitrogen supply and generation system; and
 - Fire water monitor and Alkylation Unit deluge systems.
- b. Respondent shall, within 365 days of the completion of each evaluation in 4.a.i. and ii., above, respectively, for the identified enhancements, upgrades, or improvements to these critical utility systems that do not require a permit modification, permit, or turnaround, Respondent shall complete the identified feasible and cost-effective enhancements, upgrades, or improvements on the Torrance Refinery’s critical utility systems. Respondent shall commence construction within 45 days of receipt of all necessary equipment.
- c. Respondent shall, within 30 days of the completion of the identified enhancements, upgrades, or improvements on the Torrance Refinery’s critical utility systems in 4.b above, provide documentation to the District of completion of these enhancements, upgrades, or improvements.
- d. For enhancements, upgrades, or improvements on the Torrance Refinery’s critical utility systems identified in 4.a above that require permit modifications or permits, Respondent shall submit the appropriate applications for the identified feasible and cost-effective enhancements, upgrades, or improvements within 90 days from the completion of the evaluation in 4.a. Within 365 days from the issuance of such permit modifications or permits, if a turnaround is not required, Respondent shall complete the identified enhancements, upgrades, or improvements. Respondent shall commence construction within 45 days of receipt of all necessary equipment or receipt of permit modification or permit, whichever is later.
- e. Respondent shall, within 30 days of the completion of the identified enhancements, upgrades, or improvements on the Torrance Refinery’s critical utility systems in 4.d

1 above, provide documentation to the District of completion of these enhancements,
2 upgrades, or improvements.

3 f. For enhancements, upgrades, or improvements on the Torrance Refinery's critical
4 utility systems identified in 4.a above that require a turnaround, and that are feasible
5 and cost-effective, Respondent shall comply with 4.d above, and install the identified
6 enhancements, upgrades, or improvements at the next scheduled turnaround for its
7 associated equipment or process unit.

8 g. Respondent shall, within 30 days from the completion of the identified
9 enhancements, upgrades, or improvements on the Torrance Refinery's critical utility
10 systems in 4.f above, provide documentation to the District of these enhancements,
11 upgrades, or improvements on the Torrance Refinery's critical utility systems.
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13 h. Upon receipt of the permit modification or permit application from Respondent for
14 4.b and/or 4.f above, the District will endeavor to use its best efforts to review and
15 issue any required permit modification or permit in an expedited manner.
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17 5. Respondent shall immediately commence and use its best efforts to complete an evaluation
18 within 180 days of the issuance of the Order to identify a feasible and cost-effective temporary
19 supply of steam to the Refinery Flares 65F-3 and 65F-4 during an SCE power outage. Should
20 Respondent be unable to complete its evaluation within this timeframe for any reason, it shall
21 present such reasons, with credible evidence at the status and modification hearing on September 7,
22 2017. Within two weeks of completing this evaluation, Respondent shall provide the evaluation to
23 the District for review.
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25 6. For existing Torrance Refinery safety critical devices with UPS back up, within 190 days
26 from the issuance of the Order, Respondent shall provide evidence covering a period of six months
27 that documents that the Torrance Refinery's UPSs are maintained and operable at all times.
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1 Respondent shall also, upon request, provide to the District records pertaining to the maintenance
2 and operability of these UPSs. Upon the completion of the UPSs as provided in 3 above,
3 Respondent shall ensure that these new UPSs are maintained, operable at all times, and upon
4 request, provide to the District documentation of these UPSs maintenance and operability.

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6 7. Respondent shall:

7 a. Within 180 days from the issuance of the Order, provide the appropriate Torrance
8 Refinery personnel refresher training and refresher simulations regarding the
9 Torrance Refinery's loss of power procedures, and upon request, provide to the
10 District documentation of these refresher trainings and refresher simulations;

11 b. Within 270 days from the issuance of the Order, perform a tabletop drill at the
12 Torrance Refinery, simulating at site wide power outage.

13 i. Respondent shall provide the District at least 14 days advance notice of such
14 drill to District Inspector Steve Tsumura (stsumura@aqmd.gov) and allow
15 the District to participate in or observe the drill.

16 ii. Respondent shall provide its critique of the drill to the District within 30 days
17 (approximately one month) from the completion of the drill.

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19 8. Within 90 days from the issuance of the Order, Respondent shall:

20 a. complete a public outreach and community relations plan regarding the 220 kV
21 Proposal to update the public on the planning and progress of the project, and shall
22 include:

23 i. Updates to the Torrance Refinery Community Advisory Panel when it meets;

24 ii. Quarterly updates to the Torrance City Council; and

25 iii. Regular updates to the Torrance Refinery's website.
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- 1 b) Respondent shall log calls that the Torrance Refinery receives to its hotline and
2 responses thereto regarding the 220 kV Proposal.
3 c) Respondent shall provide quarterly reports of its updates and hotline calls and
4 responses thereto regarding the dedicated 220kV Proposal to District Inspector Steve
5 Tsumura (stsumura@aqmd.gov).

7 9. Respondent shall permit site visits by the District to verify that Respondent is
8 complying with the Order.

9 10. Respondent shall pay to expedite all permit applications to the extent necessary.

10 11. Respondent shall, for all increments requiring reports, notices, or other submittals to
11 the District, submit via email to Daphne Hsu at Dhsu@AQMD.gov, or via other methods to other
12 persons agreed to in writing by the Parties, unless specified otherwise within this Order.

13 12. The District and TORC shall endeavor to informally resolve disagreements such as
14 methods of evaluation or evaluations of specific proposals, if any. If the parties are unable to resolve
15 such disagreements, either party may petition the Hearing Board for a modification of this order.
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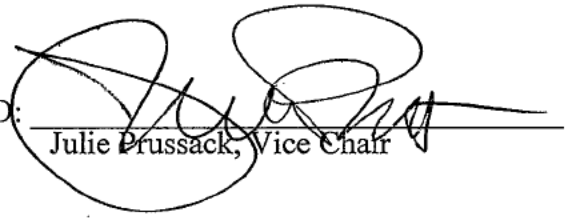
17 13. The Parties shall return to the Board for a status and modification hearing on
18 **September 7, 2017**, or as soon thereafter as this matter may be heard. At the status hearing, the
19 Parties (separately if no agreement can be reached) may propose further increments of progress for
20 Respondent's portions of the 220 kV Proposal to be adopted as part of a modification to this Order.
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22 14. The Hearing Board may modify this Order for Abatement without the stipulation of
23 the parties upon a showing of good cause therefore, and upon making the findings required by the
24 Health and Safety Code § 42451(a) and District Rule 806(a). Any modification of the Order shall
25 be made only at a public hearing held upon 10 days published notice and appropriate written notice
26 to the Respondent and the District.
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1 15. This Order for Abatement (Stipulated) is not intended to be, nor will it act as, a
2 variance. Respondent is subject to all rules and regulations of the District and to all applicable
3 provisions of California law. Nothing herein shall be deemed or construed to limit the authority of
4 the District to issue Notices of Violation, to seek civil penalties or injunctive relief, or to other
5 administrative or legal relief. The Findings of Fact are based on evidence presented by Petitioner
6 and Respondent as of the date hereof.
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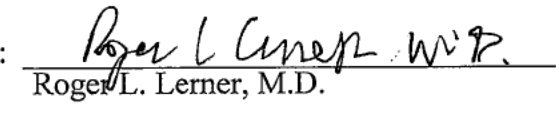
8 16. The Hearing Board shall retain jurisdiction over this matter until compliance with the
9 terms of this Order is achieved.

10 Good cause appearing, it is so ordered.

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13 FOR THE BOARD: 
14 Julie Prussack, Vice Chair

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16 DATED: 2/21/17

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18 I VOTE NO: 
19 Hon. Nate Holden

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21 I VOTE NO: 
22 Roger L. Lerner, M.D.

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