



Torrance Refining  
Company LLC  
3700 W. 190<sup>th</sup> Street  
Torrance, CA 90504  
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***VIA HAND-DELIVERY***

January 18, 2018

Dr. Clark E. Parker, Sr.  
Chair of the Refinery Committee  
South Coast Air Quality Management District  
21865 Copley Drive  
Diamond Bar, CA 91765

**Re: South Coast Air Quality Management District's Proposed Rule 1410 Rulemaking**

Dear Dr. Parker:

I hope this message finds you well and enjoying 2018.

The Torrance Refinery team looks forward to seeing you at the upcoming South Coast Air Quality Management District (District) Refinery Committee meeting on Saturday, January 20, 2018, where District staff will be discussing Proposed Rule 1410 - Hydrogen Fluoride Storage and Use at Petroleum Refineries (PR 1410), which only impacts two of the five Southern California refineries – Torrance Refining Company LLC's (TORC) Torrance Refinery and Valero Energy Corporation's (Valero) Wilmington Refinery. We appreciate District staff releasing their presentation on January 12<sup>th</sup> to give us and other stakeholders the opportunity to review prior to the January 20<sup>th</sup> Refinery Committee meeting.

In preparation for the January 20<sup>th</sup> meeting, we have prepared two documents, which are attached for your review. The first document (Attachment I) provides an update on Torrance Refinery activities and accomplishments. A tremendous amount has been achieved during our short period of ownership. The second document (Attachment II) includes our preliminary comments regarding District staff's presentation that was released on January 12<sup>th</sup>. We have reviewed the District staff's presentation and are encouraged by the focus of enhancing safety systems as the rulemaking conceptual framework for PR 1410. Based on our current review of staff's presentation, however, we have identified several areas of concern with staff's presentation and the currently proposed PR 1410 rulemaking conceptual framework. By separate letter, we will be submitting to District staff our full concerns and comments.

Also in preparation for the January 20<sup>th</sup> meeting, we are sending copies of the following documents (Attachment III) that we, California Energy Commission, and UOP have provided to District staff related to the PR 1410 rulemaking process for your awareness.

- Tab 1: Alkylation Study Estimate and Reports, Burns & McDonnell, June 2017
- Tab 2: Economic Impact of the Torrance Refining Company LLC Torrance Refinery, Capital Matrix Consulting, August 2017

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- Tab 3: Impact of an HF Ban on Southern California Transportation Fuels Study, Stillwater Associates, LLC, July 2017
- Tab 4: Potential Transportation Fuel Supply and Price Impacts of HF Ban, California Energy Commission, September 2017
- Tab 5: Torrance Refinery Alkylation Overview Presentation, 2017
- Tab 6: Torrance Refinery MHF Fact Sheet, 2018
- Tab 7: Torrance Refinery Overview Presentation, 2017
- Tab 8: TORC letter to Philip Fine, Ph.D, September 20, 2017
- Tab 9: TORC letter to Philip Fine, Ph.D, December 12, 2017
- Tab 10: TRAA presentation referenced in TORC Letter to Philip Fine, Ph.D, December 12, 2017
- Tab 11: UOP LLC letter to Michael Krause, September 18, 2017
- Tab 12: Press Release "Highly Toxic Chemical to be Phased Out at Valero Refinery: District, February 7, 2003

In addition, with this letter you will be receiving a presentation from TORC called "*Setting the Record Straight, The Truth About Torrance Refinery MHF,*" (Attachment IV) which takes TRAA presentations and provides the facts behind their myths about MHF, which is still the newest, commercially viable alkylation technology available globally. Our report presents the facts based on testing, modeling, and research by qualified experts, correcting misinformation in the presentations by TRAA ("The Case Against MHF, -ARF-SRI-and Barriers-" (January 4, 2017) and TRAA's feedback to Torrance Fire Department (February 28, 2017). Our document provides factual information for use in the District's PR 1410 rulemaking process. The District staff has all the supporting documentation referenced in the report, and related work done by the District in the past that supports the safe use of MHF.

We look forward to continue working collaboratively and openly with SCAQMD to keep the PR 1410 rulemaking focused on enhancing safety, based on sound science and the current state of Alkylation technologies.

If you have any questions regarding the Torrance Refinery, its MHF Alkylation Unit, or MHF, please call, email or text Clark Wrigley or me at your convenience. Our cell phone numbers are (215) 385-4230 (Clark) and (562) 277-0012 (Betsy).

Sincerely,



Betsy A. Brien  
Manager, Western Region External Relations  
PBF Energy Western Region LLC  
[Betsy.Brien@pbfenergy.com](mailto:Betsy.Brien@pbfenergy.com)

Attachments (5)

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cc: Larry McCallon - Governing Board Member, Vice Chair Refinery Committee  
Ben Benoit – Governing Board Member, Refinery Committee  
Dr. Joseph K. Lyou - Governing Board Member, Refinery Committee  
Judy Mitchell – Governing Board Member, Refinery Committee  
Dr. William A. Burke – Governing Board Chairman, via overnight mail  
Wayne Natri – Executive Officer, via overnight mail  
Dr. Philip Fine – Deputy Executive Officer, via overnight mail