Message

**From**: Lawrence, Kathryn [Lawrence.Kathryn@epa.gov]
**Sent**: 4/4/2018 10:50:19 PM
**To**: Bazley, Greg [Bazley.Greg@epa.gov]
**Subject**: Fwd: Letter re: 2017-03-27, Notice of Inspection Findings and Request for Information for Torrance Refining Company.
**Attachments**: Sally Hayati Signature.png; ATT00001.htm; 2018-04-03 TRAA letter to EPA re 2017 Inspection Rpt.pdf; ATT00002.htm

Sent from my iPhone

Begin forwarded message:

> **From:** "Manzanilla, Enrique" <Manzanilla.Enrique@epa.gov>
> **To:** "Meer, Daniel" <Meer.Daniel@epa.gov>, "Lawrence, Kathryn" <Lawrence.Kathryn@epa.gov>, "Minor, Dustin" <Minor.Dustin@epa.gov>, "Maldonado, Lewis" <Maldonado.Lewis@epa.gov>
> **Subject: FW: Letter re: 2017-03-27, Notice of Inspection Findings and Request for Information for Torrance Refining Company.**

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> **From:** Strauss, Alexis
> **Sent:** Wednesday, April 4, 2018 9:19 AM
> **To:** Jordan, Deborah <Jordan.Deborah@epa.gov>
> **Cc:** Quast, Sylvia <Quast.Sylvia@epa.gov>; Johnson, Kathleen <Johnson.Kathleen@epa.gov>; Manzanilla, Enrique <Manzanilla.Enrique@epa.gov>; Miller, Amy <Miller.Amy@epa.gov>
> **Subject:** Fwd: Letter re: 2017-03-27, Notice of Inspection Findings and Request for Information for Torrance Refining Company.

> Sent from my iPhone
>
> Begin forwarded message:
>
> > **From:** Sally H <sallyhayati@gmail.com>
> > **Date:** April 3, 2018 at 7:30:47 PM PDT
> > **To:** Elkins.Arthur@epa.gov, elkins.arthura@epa.gov, Strauss.Alexis@epa.gov, OIG_Hotline@epa.gov
> > **Cc:** Joey Apodaca <joey.apodaca@mail.house.gov>, Francisco Lopex <Francisco.Lopez@mail.house.gov>, "Cloud, Hamilton" <hamilton.cloud@mail.house.gov>, Arsenio Mataka <arsenio.mataka@doj.ca.gov>, Al Muratsuchi <amuratsuchi@gmail.com>, Samuel.Liu@sen.ca.gov, Kip.Lipper@sen.ca.gov, tim Goodrich <timg@arroyoins.com>, "Weideman, Kurt" <KWeideman@torranceca.gov>, CityCouncil@citymb.info, citycouncil@hermosabch.org, RB Mayor Bill Brand <bill.brand@redondo.org>, Christian Horvath <christian.horvath@redondo.org>, Todd Loewenstein <todd.loewenstein@redondo.org>, Nils Nehrenheim <nils.nehrenheim@redondo.org>, john.gran@redondo.org, laura.emdee@redondo.org
> > **Subject: Letter re: 2017-03-27, Notice of Inspection Findings and Request for Information for Torrance Refining Company.**

Alexis Strauss April 3, 2018
Acting Regional Administrator, Environmental Protection Agency (EPA), Region 9
75 Hawthorne St., San Francisco, CA 94105

Arthur A. Elkins, Jr.
Office of the Inspector General, Environmental Protection Agency
1200 Pennsylvania Ave, N.W. (2410T), Washington, DC 20460

Dear Ms. Strauss and Mr. Elkins:

The attached letter (hard copy also sent by certified mail) is written by the Torrance Refinery Action Alliance (TRAA) on behalf of LA's South Bay community to raise concerns over serious and ongoing violations of the Clean Air Act and the Risk Management Program (RMP) at the PBF Energy Torrance Refining Company, LLC (Torrance Refinery or ToRC) located at 3700 W. 190th Street, Torrance, California. Other signatories to this letter include the Environment Integrity Project, Environment California, California League of Conservation Voters, Communities for a Better Environment, Sierra Club, SoCal 350 Climate Action, and Del Amo Action Committee.

Specifically, we request:

1. Modification of the ToRC modified hydrofluoric acid (MHF) RMP report to reflect the correct hydrofluoric acid (HF) worst-case toxic endpoint distance for their alkylation unit
2. Revision of ToRC's RMP plan to ensure that safe operating procedures are developed and implemented for the MHF unit
3. The EPA should prioritize new audits and inspections of the Valero, Wilmington refinery

ToRC's lack of compliance, noted in EPA's March 27, 2017 Notice of Inspection Findings, poses a serious public safety risk and warrants a final determination of revisions per the EPA's RMP Inspection guidance.[1] The EPA inspection team found that Torrance's toxic MHF endpoint distance has been significantly underestimated. The vulnerable zone is significantly larger than the zone that is currently reported. Based on the EPA's documentation and the amount of MHF in the acid settler tanks, the computed endpoint should be 16 miles, significantly higher than the current 3.2-miles, reported by the EPA as having "no clear basis." Details of these computations can be found on page 4. The Valero, Wilmington reports a similarly low toxic distance of 4.3 miles for an even larger MHF release of 55,000 lb. The HF toxic distance for that release is approximately 17 miles. These discrepancies violate the Community Right-to-Know law's guarantee of accurate information on industrial hazards and its use to facilitate emergency preparedness.

ToRC is located in the second most densely populated HF refinery area in the US; the Valero, Wilmington is located in the third most densely populated HF refinery area in the US. Millions more people and dozens of cities, including multiple environmental justice communities, lie within the larger HF risk zone, which are not within the smaller zone of the existing RMP. Due to our dense population and severe earthquake hazards, the danger posed to the public by HF alkylation is greater here than anywhere else in the US. Yet due to unsupported safety claims

for MHF, our communities are largely unaware of and wholly unprepared for any HF release. This violates the communities' right to understand and respond appropriately to industrial hazards.

For the reasons outlined in our attached letter, the Torrance Refinery Action Alliance, Environment Integrity Project, Environment California, California League of Conservation Voters, Communities for a Better Environment, Sierra Club, SoCal 350 Climate Action, and Del Amo Action Committee request that EPA Region 9 immediately initiate enforcement against the ToRC facility for the serious and ongoing violations discovered during the December 2016 inspection. There has already been a serious accident on site due to mismanagement, resulting in a near miss that could have caused catastrophic loss of life.

Our community recently became aware of a letter ToRC delivered to the City of Hermosa Beach stating, "Since receiving EPA's preliminary findings related to the refineries currently filed RMP WCS... ToRC and EPA have had frequent meetings and conference calls to clarify and resolve the preliminary findings. This cooperative and robust dialogue is contingent currently continuing, consistent with the agreed-to path forward between ToRC and EPA."

The South Bay public and media have not been included in this dialogue, which is unfortunate. The 2017 inspection report identified serious concerns about the possibility of a MHF release and its potential impact, which could harm significant numbers of people and areas of the South Bay and beyond. TRAA met with the EPA at its request on September 19, 2016 at the joint SCAQMD and EPA meeting on ExxonMobil's RMP report. But since then, we have reached out without success to EPA officials we met, seeking an update on the 2016 inspection findings, the 2017 Inspection Report, and plans for EPA corrective actions to MHF RMP reports. Our community looks forward to the public being included as a stakeholder in the dialogue to determine a path forward. Our lives depend on it.

Do not hesitate to contact us with questions.

Sincerely,