

October 13, 2017

Governing Board Chairman William A. Burke
South Coast Air Quality Management District
21865 Copley Dr., Diamond Bar, CA 91765

CC: SCAQMD Governing Board Members

Re: Support for Proposed Rule 1410 to ban MHF and HF alkylation

Dear Chairman Burke:

I am writing our organization's support of the SCAQMD Proposed Rule 1410 banning hydrofluoric (HF) and modified hydrofluoric acid (MHF) alkylation in refineries. The South Bay has been trying to eliminate HF alkylation dangers for three decades and that's long enough! We want timely adoption of an HF alkylation ban with no more than three years for replacement by any of the three safer alternatives.

According to the Chemical Safety Board, a catastrophic MHF release nearly occurred February 18th, 2015. At least 23 schools were in the main debris field formed by that explosion. If things had gone a bit differently, a lethal HF could have hit all those schools and innumerable residences and businesses. Mass casualties could have occurred. "Ash" from the explosion fell over a wider area, so HF exposure could have occurred within an even larger region. Hundreds of thousand might have required immediate medical treatment for HF exposure. Panic and evacuations would have followed. Property values would have plummeted and unplanned shutdowns of the MHF alkylation units at both refineries would follow. All this would have caused far greater suffering, damage, gas price hikes and disruption to California's economy than an orderly planned MHF replacement will.

An MHF release is no farther away than the next powerful earthquake. Millions of Southern California residents are unnecessarily at risk, because three safe commercially available alternatives exist. With a little planning, California drivers and our economy will survive the temporary disruption an MHF replacement will entail.

The Torrance refinery has experienced repeated explosions, chemical releases and fires in the last several years. Valero has reported measurable MHF/HF releases every year. HF risk is unacceptable in our densely populated area. Time is of the essence. I urge the SCAQMD to expedite the rule making process and adopt a timely ban on the use of MHF and HF alkylation with a short transition to protect refinery workers, residents and the California economy.

Thank you for undertaking this important rulemaking process.

Sincerely,

Khin Khin Gyi, M.D., Ph.D.

Elected Delegate from the 54th AD to the California Democratic Party

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