



January 24, 2019

William A. Burke, Ed.D,
Chair, SCAQMD Board
Dr. Clark E. Parker, Sr.
Chair, Refinery Committee
South Coast Air Quality Management District
21865 Copley Dr.
Diamond Bar, CA 91765

Dear Chairman Burke and Refinery Committee Chairman Parker:

I am writing in regard to Proposed Rule (PR) 1410 and recommend the SCAQMD move forward with a Memorandum of Understanding (MOU) with the refineries impacted by the rule for the following reasons:

- A MOU allows mitigation concepts to be designed for each refinery;
- A MOU is the best approach to quickly implement safety technology enhancements;
- A MOU accommodates the unique footprint of each refinery and takes into account that there is not a “one-size-fits-all” engineering solution.

I oppose a ban or phase-out of MHF because:

- The unmodified compound, hydrofluoric acid (HF), has been an important part of manufacturing for more than 250 years;
- HF is currently used in many other industries to make common consumer products such as computers, cell phones, electric lighting, pharmaceuticals and more;
- There are 120 HF/MHF alkylation units throughout the world. The refining industry makes up less than two percent of the HF use worldwide;
- Of the 89 U.S. refineries with alkylation units, over half (50) use HF or MHF. The remaining 39 use sulfuric acid, which also requires strict safety protocols and is the only other commercially proven alkylation technology available.

According to the California Energy Commission, a ban of MHF could cause two Southern California refineries to cease operations. If this were to happen, the state could potentially lose thousands of jobs, and it could result in higher gasoline prices at the pump for California residents, businesses, and government. Having affordable fuel that is readily available is a vital part of the California economy.

I respectfully urge you and the other SCAQMD Governing Board Members to support the installation of enhanced safety measures and to implement them through a MOU to achieve timely and tangible safety benefits, while preventing the negative economic consequences an MHF ban or phase-out could cause.

Thank you,

A handwritten signature in black ink that reads "Eileen A. Hupp". The signature is written in a cursive style with a large, sweeping flourish at the end of the word "Hupp".

Eileen Hupp
SBACC Chair