



Alliance of Nurses for Healthy Environments
Bringing Science and Passion to the Environmental Health Movement

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Affiliations added for identification
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April 20, 2018

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

CC: SCAQMD Governing Board Members
Re: SUPPORT for the elimination of MHF and HF alkylation within four
years of PR 1410 adoption

Dear Chairman Burke:

On behalf of the Alliance of Nurses for Healthy Environments (ANHE), I am writing to convey our support for a *Proposed Rule 1410 that replaces hydrofluoric acid (HF) and modified HF (MHF) alkylation with a safe alternative within four years of rule adoption*. ANHE represents approximately 3000 nurses from across the country and approximately 300 from across the state of California. We are the only national nursing organization focused on the intersection of the environment and health. As nurses, we find that the initial rule concept presented by the SCAQMD on 1/20/2018 is not acceptable. HF mitigation systems are *inadequate protection* for the densely populated South Bay and Harbor areas.

The South Bay and Harbor areas have been trying to eliminate HF alkylation dangers for three decades; that's long enough. According to the Chemical Safety Board, a catastrophic MHF release nearly occurred Feb. 18, 2015. The release would have exposed residences, businesses, and over 20 schools in session to a lethal HF cloud. For the first 8 miles outside of the epicenter, HF concentration could have been high enough to result in death after just a short-term exposure. A public health disaster would have followed, with mass casualties and tens of thousands requiring immediate medical treatment for possible HF exposure. The Agency for Toxic Substances & Disease Registry deems HF a "serious systemic poison." After being inhaled or easily absorbed through the skin, it can have severe health effects due to fluoride ions penetrating deep tissue. The chemical poses a heightened risk to groups especially vulnerable to chemical exposures, such as children, pregnant women, and the elderly. As nurses, we believe it is unacceptable to risk exposing community members and workers to MHF, which we know to be no safer than HF.

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. Regardless of the mitigation systems attempt, such as sirens or alert systems, the continued use of MHF/HF places millions of Southern California residents at unnecessary risk on a daily basis. Three safe and commercially available alternatives exist which could eliminate the need for people to live in fear and apprehension of the next accident.



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As nurses, we believe that all people have the right to health and healthy environments, and our role as nurses is to promote these rights for our patients and their communities. It is in this spirit that we urge the SCAQMD to expedite the rulemaking process and adopt a timely replacement or cessation of MHF and HF alkylation to protect the health and safety of Southern California residents and refinery workers.

Sincerely,

Sara E. DeLaney, RN, MSN/MPH
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