



Live Well. Health Matters.

April 24, 2018

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

Dear Chairman Burke:

Beach Cities Health District (BCHD) is a preventive health agency serving the residents of Hermosa Beach, Manhattan Beach and Redondo Beach. On behalf of the BCHD Board of Directors, I am writing to support SCAQMD's Proposed Rule 1410 to ban the use of modified hydrofluoric acid (MHF) at the Torrance Refinery.

After the Torrance Refinery explosion in 2015, where debris narrowly missed hitting a tank of MHF, our community was rightfully concerned about the safety and health effects of the toxic chemical. When released, hydrofluoric acid forms dense clouds that stay close to the ground and travel with prevailing winds. Upon skin contact, the fluoride ions readily penetrate the skin, causing damage to deep tissue layers including bone. Inhalation can damage lung tissue, and cause swelling and fluid accumulation in the lungs. Significant exposure can be lethal and long-term health effects to acute exposure range from chronic lung disease, persistent pain, bone loss and blindness.

While the additives in the modified hydrofluoric acid are intended to make the chemical less volatile and reduce the likelihood of forming dense vapor clouds in the event of an accidental release, your own assessments show that the ability to prevent the formation of a vapor cloud is uncertain and your "best-case" scenario estimations hypothesize that 11% of the hydrofluoric acid would still be released. Given that the border of our jurisdiction is less than a mile from the Torrance Refinery, the chance of exposure to MHF in our community is not something we are willing to risk.

BCHD is concerned about the safety and well-being of our residents in the event of an accidental release of MHF given the volatile and hazardous nature of hydrofluoric acid and the proximity of the Torrance Refinery to our community. We urge you to place a prohibition on the use of MHF with Proposed Rule 1410.

Respectfully,

A handwritten signature in black ink, appearing to read "Vanessa Poster", is written over a large, light blue circular watermark or stamp.

Vanessa Poster
President Pro Tem
Beach Cities Health District



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CC: Dr. Clark E. Parker, Vice-Chair, SCAQMD Board Member
Marion Ashley, SCAQMD Board Member
Ben Benoit, SCAQMD Board Member
Joe Buscaino, SCAQMD Board Member
Michael A. Cacciotti, SCAQMD Board Member
Dr. Joseph K. Lyou, SCAQMD Board Member
Larry McCallon, SCAQMD Board Member
Judy Mitchell, SCAQMD Board Member
Shawn Nelson, SCAQMD Board Member
Dwight Robinson, SCAQMD Board Member
Janice Rutherford, SCAQMD Board Member
Hilda L. Solis, SCAQMD Board Member