From: VanessaRodriguez <info@sustainableeconomy.energy>
Date: September 11, 2018 at 9:20:21 AM PDT
To: <info@sustainableeconomy.energy>
Subject: Message to the SCAQMD Opposing Any Ban or Phase-out of MHF
Reply-To: <info@sustainableeconomy.energy>

Dear Chairman Burke and Refinery Committee Chairman Parker:

I am writing in regards 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 aerospace, 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 a MHF ban or phase-out could cause.

Thank you.

Vanessa Rodriguez

From: GesuinaParas <info@sustainableeconomy.energy>
Date: September 11, 2018 at 9:34:42 AM PDT
To: <info@sustainableeconomy.energy>
Subject: Message to the SCAQMD Opposing Any Ban or Phase-out of MHF
Reply-To: <info@sustainableeconomy.energy>

Dear Chairman Burke and Refinery Committee Chairman Parker:

As a Torrance resident and Torrance Refining Company employee, I am writing in regards to Proposed Rule (PR) 1410, and recommend the SCAQMD move forward with a Memorandum of Understanding (MOU) with the refineries impacted by the rule. I have been following the meetings and discussions regarding this issue, and considering that there are currently no commercially available alternatives to MHF, our site's robust, redundant and sophisticated safety systems, and the shared goal of the community and refineries for safety, I request that you move forward with a MOU. Doing so allows mitigation concepts to be designed for each refinery. Also, a MOU is the best approach to quickly implement safety technology enhancements and accommodates the unique footprint of each refinery, taking into account that there is not a “one-size-fits-all" engineering solution.

I would like to respectfully remind you that there are important and fact-based reasons for opposing a ban or phase-out of MHF, such as the following:
• 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 aerospace, 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.

Regarding switching to sulfuric acid, I think it would be disingenuous for supporters of a ban to willingly accept the other risks, particularly the environmental ones, posed by a switch to sulfuric acid; please note that if this done so, they would be only voicing the opinion of a few while the impacts of a switch to sulfuric acid will be broad and far-reaching, impacting many other communities. I, for one, as a Torrance resident do not agree with a switch to sulfuric acid for many of the reasons presented and discussed at the Working Group meetings and prior Refinery Committee meetings, including that of the California Energy Commission's (CEC).

According to the CEC, a ban of MHF could cause two Southern California refineries to cease operations. Unlike others who choose to dismiss this, I recognize that in our current socioeconomic climate, this is in fact a possibility. 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 a MHF ban or phase-out could cause. The facts of the matter have not changed, and this has been discussed thoroughly with much public input; I think it's time to move forward a realistic, reasonable and positive solution.

Thank you.

Gesuina Paras