



Torrance Refinery Action Alliance

VIA EMAIL: PFurey@TorranceCA.Gov; Cc: Torrance City Council Members

August 14, 2017

Hon. Patrick Furey, Mayor of Torrance
3031 Torrance Blvd., Torrance, CA 90503

Dear Mayor Furey:

Thank you for hosting the Torrance CC Refinery Workshop on August 5 on a weekend and with extra time. We suggest a more interactive workshop would be useful in the future, to include a limited duration Q&A period after each presentation. For example, Dr. Philip Fine of the AQMD made a slip of the tongue, saying “HF” was vented to the flare, instead of H₂. Because this error could cause misunderstanding in audience members, after Dr. Fine finished speaking Dr. Jim Eninger raised his hand in a polite attempt to advise him. But you swiftly silenced Dr. Eninger. A brief clarification could have avoided possible alarm. Requiring community members to use comment time for questions is not optimal for fostering a meaningful public engagement. Dr. David Hannum’s question during his public comment would have gone unanswered if not for Councilman Herring’s intercession.

At the Workshop’s end you responded to public comments by declaring the city won’t act based on “rhetorical statements, attacks, and word of mouth.” Not one council member spoke up to publicly counter this dismissive assessment of concerned and informed citizens. The anger heard from a few individuals at the workshop comes from valid concerns, aggravated by the city’s lack of response and promotion of discredited safety claims made by the refinery for modified hydrofluoric acid (MHF). Your continued declarations that the 1990 Torrance-Mobil Consent Decree binds the city’s hands and that Torrance (being merely a city) is helpless to act are wholly unconvincing. Even the Consent Decree Safety Advisor acknowledged an earthquake could cause a MHF release and the simultaneous failure of mitigation systems (page 41, 1995 report). Even ToRC’s lowball official EPA report acknowledges a 3.2-mile path of serious and irreversible injuries possible from a 5,200 lb. release. The City of Richmond developed its own refinery regulations, but Torrance so far refuses even to throw its support behind AQMD PR 1410 and AB 1645 to ban MHF *or to prepare the community for an accidental MHF release*.

TRAA’s case against MHF is built on solid scientific evidence, which is why the Norton report and the conclusions of investigations by the US EPA, US Chemical Safety Board, and AQMD are consistent with our conclusions. The experts have spoken. The EPA acknowledged MHF RMP reports *significantly understate community risk* and said *MHF mitigation is not permissible for a worst-case release report* (<http://bit.ly/2o4fKGj>). I am on the AQMD PR 1410 Working Group, which was recently told staff’s “initial conclusion” on MHF (as I said in public comments) is that *MHF must go*. See page 5 of the attached briefing, posted on the AQMD website (<http://bit.ly/2wBHeUh>).

The Greater South Bay was told the dangers of HF alkylation had been all but eliminated in 1997 in Torrance and 2007 in LA at the Valero, Wilmington refinery. But the risk posed by MHF is identical to that of HF alkylation. A release of 50,000 lb. MHF from a single tank could result in 16-mile path of serious and irreversible injuries. Failure by the City to act responsibly in the face of scientific facts and evidence regarding the known impact of an MHF release on the citizens, businesses, and workers in Torrance and surrounding cities leaves the City open to fiscally disastrous lawsuits and legal claims. Relying on self-interested and unsupported assurances of the refinery, discredited by the EPA, the AQMD, and independent experts, doesn’t satisfy the City’s duty to its constituents.

It is vitally important Torrance pass a resolution in support of a MHF ban and plan and practice drills for MHF emergency preparedness. The AQMD Board needs all the support it can get to act on the staff’s recommendation.

Sincerely,

Sally Hayati, Ph.D.
President, TRAA