



City of Hermosa Beach

Civic Center, 1315 Valley Drive, Hermosa Beach, CA 90254-3885

March 13, 2018

Dr. William A. Burke, Chairman
Members of the Governing Board
South Coast Air Quality Management District (SCAQMD)
21865 Copley Drive
Diamond Bar, CA 91765

RE: PR 1410 — SUPPORT MHF Replacement within 4 Years NOT 3 Tiers of Mitigation

Dear Chairman Burke and Members of the Governing Board:

The City of Hermosa Beach joins with neighboring South Bay cities, local organizations and residents to urge the South Coast Air Quality Management District Board and Staff to adopt a Rule replacing hydrofluoric acid (HF) and Modified HF (MHF) alkylation with a safe alternative within four years of rule adoption. HF is hazardous and poses an extreme danger to our local communities; no mitigation can provide adequate protection for our densely populated region.

According to the US Chemical Safety Board, our community narrowly missed a catastrophic MHF release during the 2015 ExxonMobil explosion. The US EPA 2017 Inspection report found that the Torrance refinery's official MHF risk estimate is understated, has "no clear basis," and that an HF risk estimate should be used instead. It also identified many serious safety lapses by ToRC's management of the alkylation unit. The AQMD staff's scientific assessment of MHF in August 2017 was that MHF safety claims have not been proven; that it poses a health risk to a significant numbers of persons, and therefore it is a necessity to phase it out. We urge you, therefore, to expedite rule making to mandate MHF replacement.

Hermosa Beach residents, workers, and visitors are at constant risk of a MHF release from the Torrance refinery, just 3.5 miles from city limits. It is unacceptable to risk a disaster of Bhopal-like proportions in the South Bay.

Sincerely,

Jeff Duclos, Mayor
City of Hermosa Beach