

**Coalition For A Safe Environment
California Kids IAQ
Community Dreams
EMERGE
American Legion Post 6
Wilmington Improvement Network
San Pedro & Peninsula Homeowners Coalition
NAACP- San Pedro-Wilmington Branch # 1069
California Safe Schools
St. Philomena Social Justice Ministry**

February 1, 2019

Governing Board
South Coast AMD
21865 Copley Drive
Diamond Bar, CA
cob@aqmd.gov

Re: Agenda 25. Proposed Approach to Address Hydrogen Fluoride Storage and Use at Petroleum Refineries

Su: CFASE et al Rule 1410 Public Comments Submission

Dear South Coast AQMD Governing Board:

On behalf of the undersigned organizations we would like to submit our public comments on Agenda 25. Proposed Approach to Address Hydrogen Fluoride Storage and Use at Petroleum Refineries.

1. Wilmington and Torrance Environmental Justice Organizations and the community Support an AQMD Rule that will Phase-Out MHF within 3-4 years. The estimated cost based on information provided by other refineries to switch over to a safer technology is \$100-\$400 million. AQMD has the authority to adopt a Rule to Phase-Out MHF.
2. We DO NOT Support the use of an MOU under any condition. EJ Organizations and the Public did not request the AQMD to consider an MOU as implied by AQMD Staff.
3. AQMD Staff has provided No Scientific Evidence that proves that the proposed Mitigation Measures will work in a worst-case-scenario such as a catastrophic accident, natural disaster or act of terrorism. AQMD Staff has Proposed No Back-Up Systems for a worst-case-scenario.
4. AQMD staff failed to advise the Public and AQMD Board of the following:

The National Institute for Occupational Safety & Health (NIOSH) has a more comprehensive definition of worker public health dangers from chemical exposure.

Methodology for Setting IDLH Values (IDLH - Immediately Dangerous to Life or Health)

“poses a threat of exposure to airborne contaminants when that exposure is likely to cause death or immediate or delayed permanent adverse health effects or prevent escape from such an environment,

Current Intelligence Bulletin 66: Derivation of Immediately Dangerous to Life or Health (IDLH) Values, DHHS (NIOSH) Publication Number 2014-100

IDLH values represent a maximum level above which workers should not be exposed without highly reliable respiratory protection. The values are also intended to ensure that workers can escape from IDLH conditions even if their respiratory protection fails.

Rule 1410 and Rule 1180 Refinery Fenceline Air Monitoring Plan Guidelines fail to acknowledge this NIOSH definition.

- 5. We DO NOT Support the inclusion of the AQMD Staff proposed Performance Standard. EJ Organizations and the Public did not request the AQMD to consider a Performance Standard as implied by AQMD Staff. If MHF is released we are all dead so a Performance Standard is useless. AQMD can require Mitigation Measures Modeling and Testing now without a Performance Standard.**
- 6. The Proposed Performance Standard is unacceptable and does not comply with NIOSH Current Intelligence Bulletin 66: Derivation of Immediately Dangerous to Life or Health (IDLH) Values, DHHS (NIOSH) Publication Number 2014-100 for the advisement of life threatening lethal dangers.**
- 7. The Proposed Performance Standard AIHA Emergency Response Planning Guidelines is unacceptable because MHF can kill everyone in less than 5 minutes and as far as 2-3 miles. The guidelines reference to 10 minutes response time is unacceptable.**

AQMD Staff failed to require in Rule 1410, Rule 1180 and acknowledge that there is 1 minute detection and reporting instrumentation available. For maximum public and worker safety detection and notification we request that they be required to use an Atmosfir Optics D-Fenceline System which can achieve true real-time parts-per-billion (ppb) measurements for every chemical, conduct Data QA Validation and Reporting in 1-minute intervals.

- 8. The Proposed Detection Limits are unacceptable because they are based on Air Quality Monitoring Instruments that only have ppm detection and reporting capability and not ppb (Parts Per Billion).**

AQMD Staff failed to require in Rule 1410, Rule 1180 and acknowledge that there is ppb instrumentation available. For maximum public and worker safety detection and notification we request that they be required to use an Atmosfir Optics D-Fenceline System which can achieve true real-time parts-per-billion (ppb) measurements for every chemical, conduct Data QA Validation and Reporting in 1-minute intervals.

- 9. The Proposed Public Notification Thresholds are unacceptable because they are based on a 1-hour average. Some chemical averages are significantly higher than the Acute REL. MHF can kill everyone in less than 5 minutes and as far as 2-3 miles.**

AQMD Staff failed to require in Rule 1410, Rule 1180 and acknowledge that there is 1 minute detection and reporting instrumentation available. For maximum public and

worker safety detection and notification we request that they be required to use an Atmosfir Optics D-Fenceline System which can achieve true real-time parts-per-billion (ppb) measurements for every chemical, conduct Data QA Validation and Reporting in 1- minute intervals.

10. The Acute Exposure Levels for HF for 10 minutes to the 10 power reference is unacceptable because MHF can kill everyone in less than 5 minutes and as far as 2-3 miles.

AQMD Staff failed to require in Rule 1410, Rule 1180 and acknowledge that there is 1 minute detection and reporting instrumentation available. For maximum public and worker safety detection and notification we request that they be required to use an Atmosfir Optics D-Fenceline System which can achieve true real-time parts-per-billion (ppb) measurements for every chemical, conduct Data QA Validation and Reporting in 1- minute intervals.

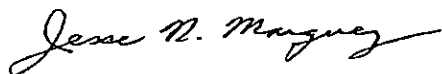
11. All submitted Draft Oil Refinery Fenceline Air Monitoring Plans and Public Notification System proposals were unacceptable. Each refinery failed to include an acceptable detailed description of their proposed Types of Public Notification and Methods of Public Notification.

The Coalition For A Safe Environment et al submitted Public Comments with our requested description of the Types of Public Notification and Methods of Public Notification. See Attachment.

12. Ultramar/Valero can reduce manufacturing and product storage capacity to create extra space for cleaner and safer alternative technologies. Due to current state policies in reducing greenhouse gases and zero emissions freight and public transportation there will be a significant reduction in the use of fossil fuels in the future.

For any questions or information please send all correspondence or questions to me as principal contact regarding these public comments.

Respectfully Submitted,



Jesse N. Marquez
Executive Director
Coalition For A Safe Environment
1601 N. Wilmington Blvd., Ste. B
Wilmington, CA 90744
jnm4ej@yahoo.com
310-590-0177

Ricardo Pulido
Executive Director
Community Dreams
1601 N. Wilmington Blvd., Ste. B3
Wilmington, CA 90744
mr.rpulido@gmail.com
310-567-0748

Magali Sanchez-Hall, MPH
Executive Director
EMERGE
913 East O Street
Wilmington, CA 90744
mssanchezhall7@gmail.com
646-436-0306

Anabell Romero Chavez
Wilmington Improvement Network
Board Member
1239 Ronan Ave.
Wilmington, CA 90744
anab3ll310@yahoo.com
310-940-4515

Joe R. Gatlin
Vice President
NAACP
San Pedro-Wilmington Branch # 1069
225 S. Cabrillo Ave.
San Pedro, CA 90731
joergatlin45k@gmail.com
310-766-5399

Drew Wood
Executive Director
California Kids IAQ
1601 N. Wilmington Blvd., Ste. B4
Wilmington, CA 90744
californiakidsiaq@gmail.com
916-616-5813

Chaplain Anthony Quezada
American Legion Post 6
1927 E. Plymouth St.
Long Beach, CA 90810
m.in.usa.aq@gmail.com
310-466-2724

Dr. John G. Miller, MD
San Pedro & Peninsula Homeowners Coalition
President
1479 Paseo Del Mar
San Pedro, CA 90731
igornla@cox.net
310-548-4420

Modesta Pulido
Chairperson
St. Philomena Social Justice Ministry
22106 Gulf Ave.
Carson, CA 90745
vdepulido@gmail.com
310-513-1178

Robina Suwol
Executive Director
California Safe Schools
P.O. Box 2756
Toluca Lake, CA 91610
robinasuwol@earthlink.net
818-261-7965

Coalition For A Safe Environment

Emergency Public Notification Proposal

Types of Public Notification

- Tier I** **Emergency. Incident that poses a threat of exposure to airborne contaminants when that exposure is likely to Cause Immediate Death (Public Health & Safety Threshold Exceeded/Natural Disaster)**
- No longer than 1 minute from detection.**
- Tier II** **Emergency. Incident that poses a threat of exposure to airborne contaminants when that exposure is likely to cause immediate or delayed Permanent Adverse Health Effects (Public Health & Safety Threshold Exceeded/Natural Disaster)**
- No longer than 5 minutes from detection.**
- Tier III** **Equipment Failure or Malfunction, Power Failure, Weather Impact, Internet Outage etc.**
- No longer than 10 minutes from detection.**
- Tier IV** **The posting of new information such as Report Availability, Planned Maintenance, New Equipment Purchase, Public Tour etc.**
- No longer than 1 hour after availability.**

Methods of Public Notification

Emergency (In order of priority)

- a. Direct Phone Call To Home or Residence**
- b. Direct Phone Call To Cell Phone**
- c. Direct Phone Call To Designated Person/Guardian**
- d. Direct Phone Call To Work or Field Location**
- e. Text Message To Cell Phone**
- f. Community Door-to-Door Advisement**
- g. Facility Public Loud Audio Announcement**
- h. Facility Public Loud Audio Alarm**
- i. Off-Site Public Location Loud Audio Announcement**
- j. Off-Site Public Location Loud Audio Alarm**
- k. Drone Aerial Loud Audio Announcement/Alarm**
- l. Mobile Vehicle Speaker Announcement**
- m. Police/Emergency Response Vehicle Speaker Announcement**

Non-Emergency (In order of priority)

- a. Personal Email**
- b. Identified Listed Social Media**
- c. US Postal Mail**
- d. Door-to-Door Drop-Off**