



First Lutheran Church and School

A caring community of Christian faith for all people

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June 17, 2019

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

Re: Proposed Rule 1410 Hydrogen Fluoride Storage and Use at Petroleum Refineries

Dear Dr. Burke and Members of the Governing Board:

I am writing to express our grave concern over recent reports regarding hazardous chemicals threatening our Torrance community, and especially those living near the Torrance Refinery on Crenshaw Boulevard and Del Amo Boulevard.

I serve as Senior Pastor and Mission Director of First Lutheran Church and School (FLCS), a neighborhood ministry that has been located in Torrance for more than 90 years. FLCS is a faith-based religious and educational community -- including a congregation of 900 members, a parochial school serving 350 students from Kindergarten through Eighth Grade, a preschool center serving 150 children from infancy through Age 4, and daycare facilities serving nearly 100 children. We are located only two miles from the Torrance Refinery. We represent over 2,500 people here in the South Bay community, of all ages – people who have a right to expect that their children, elders and families will be safe and protected when they come to our campus and neighborhood.

For this reason, and because we take seriously our civic responsibility to our constituents and our neighbors, expect and insist that SCAQMD immediately require enhanced mitigation efforts at the local refinery site, and that all the refineries under your accountable care immediately take all necessary steps to eliminate the use of toxic Hydrofluoric Acid. We take this action for one simple reason: because elimination of HF is the only 100% fail-safe measure for community safety, and because our children, adults and elders deserve no less from any business that would deem itself a worthy community partner and responsible corporate citizen.

As the science makes crystal clear, HF/MHF alkylation is a critical risk in LA County, one of the most densely populated urban areas in the US, and recognized by government and experience as a earthquake hotspot. The US Chemical Safety Board and SCAQMD have both affirmed that a MHF release in our area would likely be catastrophic – holding the spectre of killing tens of thousands and permanently harming hundreds of thousands of people and other living things. According to the LA County Department of Health, “emergency responders, emergency rooms and burn centers would be overwhelmed and unprepared” in the event of a catastrophic

Mission: We welcome all God's children to embrace the grace of Jesus called and sent to serve and speak God's love in daily life

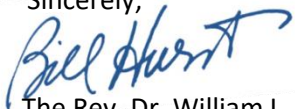
release. ***The simple fact is that evacuation would be impossible, due to high population density, as well as the rapid dispersion of these chemicals into the atmosphere.***

Catastrophic Release scenarios, by definition, include Earthquakes, Accidents and Terrorist attacks. Within each of these events it is probable that mitigation (including automated mechanisms), could malfunction -- whether by electrical supply failure, mechanical failure, deferred maintenance or other causes -- as we have previously seen in past Refinery incidents. ***Even with the best of intentions, mitigation systems do fail.*** For instance, during the HF release in 1987 at the Marathon Refinery, falling equipment broke off two pipes at the top of an HF tank, while also damaging its emergency water spray system. And during the 2009 CITGO Refinery HF release, their water suppression system ran out of water due to efforts at fighting both the fire and an acid spill. Past mitigation measures also failed in the Union Carbide, Bhopal, and the Chernobyl nuclear disasters.

Residents have been trying to eliminate HF alkylation since 1987. Commercially viable and affordable alternatives include conventional or advanced sulfuric acid, ionic liquids, and solid acid catalyst. ***We urge the AQMD to propose changes to the proposed Rule 1410 that would immediately require enhanced mitigation and implement a phase-out of MHF within 4 years.***

History is rife with examples of the terrible consequences of short-sighted, self-serving, and ill-conceived actions by corporations who failed to discharge their civic duty to assure their neighbors and communities of proper safety. With all the information at your disposal – and with safer options available to avert a potential disaster – it would be equally tragic and inexcusable to fail to do your civic duty, taking reasonable and prudent steps to ensure that facilities will withstand disasters that we all hope will not befall us – in the certainty that such events can and will occur. All the hand-wringing, regrets, and “thoughts and prayers” in the world will not change the catastrophic effects of such a failure of corporate courage. We call on you to do what both we and you know is right: to act promptly and responsibly to protect your customers, neighbors, and fellow citizens. Nothing less will do, and failure to act with the honesty and integrity you owe to this community will be a failure remembered for a long time to come.

Sincerely,



The Rev. Dr. William L. Hurst
Senior Pastor and Mission Director