



Torrance Refinery Action Alliance

Dr. William Burke, Chair, SCAQMD Governing Board

July 8, 2019

SUBJECT: REGULATION OF OFFSITE HF EMISSIONS [RULE 1410]

Dear Chairman Burke and Members of the SCAQMD Board of Directors:

Earlier this year your Honorable Board voted 9-4 to reject a motion that would have overturned previous Board directives by restricting Staff to the pursuit of one and only one approach to resolving the longstanding issue of Hydrogen Fluoride at the Valero and Torrance Refineries. Specifically, that motion would have directed Staff to cease pursuit of a Regulation in favor of pursuing ONLY an MOU.

Your Board rejected that motion in favor of maintaining its previous directive to continuing along a dual track by having Staff bring back to the Board two options for consideration: 1) a Regulation, and 2) an MOU, both based on a Performance Standard capable of assuring the Board that all possibility of injury from offsite exposure had been eliminated by transitioning to a vastly safer alkylation catalyst or by enhanced mitigation if conceivably feasible.

On June 22, the Refinery Committee voted 3-2 to overturn the Board's previous direction by restricting Staff to bringing back only one of the Board's previously directed options — an MOU, and we would add a severely flawed MOU with a much weaker Performance Standard than all previous iterations brought forward by Staff to the Board and inconsistent with all previously submitted staff recommendations.

We write to respectfully request that the full Board clarify whether it had delegated to the Refinery Committee the authority to rescind this 9-4 Board policy by eliminating one of the two options requested by the Board only a handful of months ago — a delegation that would *de facto* eliminate the Board's discretion to consider both options either separately or in some combination when the matter is scheduled to be taken up again by the full Board in November.

We thank you in advance for considering our request for clarification.

Respectfully submitted on behalf of the Torrance Refinery Action Alliance (TRAA) by

Steve Goldsmith
TRAA Co-Founder

cc: Council Member Ben Benoit, Vice Chair, SCAQMD Governing Board
Mayor Larry McCallon, Chair, Refinery Committee
Mayor Judith Mitchell, Vice Chair, Refinery Committee
Supervisor Lisa A. Bartlett
Council Member Joe Buscaino
Council Member Michael A. Cacciotti
Senator Vanessa Delgado
Supervisor Janice Hahn
Supervisor V. Manuel Perez
Council Member Dwight Robinson
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Wayne Nastri, Executive Director