



January 30, 2019

Dr. William Burke, Chairman
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765

RE: South Coast Air Quality Management District (AQMD) Proposed Rule (PR) 1410

Dear Chairman Burke,

We are writing on behalf of the Valley Industry & Commerce Association (VICA), representing more than 400 businesses in the San Fernando Valley and throughout Los Angeles County. VICA remains opposed to any ban or phase-out of Modified Hydrofluoric Acid (MHF) under Proposed Rule 1410.

For generations, oil production and refining have been key components of California's economy and a ban on MHF would have a significant impact California family that depend on those jobs.

According to the California Energy Commission, banning MHF could cause two Southern California refineries to cease operations. The economic impact would be felt across the state costing thousands of jobs and increasing gasoline prices for California residents and businesses by an estimated 26 cents per gallon.

Hydrogen Fluoride (HF) has been in use for over 250 years and many industries use this chemical to make common consumer products including computers, cell phones, and pharmaceuticals. Of the 89 United States refineries with alkylation units, 50 use HF or MHF. Both California refineries use the modified version of HF.

PR 1410 should focus on enhancing and implementing safety measures through a Memorandum of Understanding (MOU), which would allow mitigation concepts to be designed for each refinery impacted by PR 1410.

Banning MHF is unnecessary and the wrong approach to improving refinery safety. We urge you and the SCAQMD Governing Board Members to oppose any such ban or phase-out and encourage you to move forward with a MOU to accommodate the unique footprint of each refinery.

Sincerely,

Lisa Gritzner
VICA Chair

Stuart Waldman
VICA President

CC: SCAQMD Refinery Committee Chairman Parker