

NOTICE OF THE SCAQMD REFINERY COMMITTEE MEETING

REFINERY COMMITTEE: Dr. Clark E. Parker, Sr., Chair Mayor Larry McCallon, Vice Chair Mayor Ben Benoit Dr. Joseph K. Lyou Mayor Pro Tem Judith Mitchell Dr. William A. Burke, Ad Hoc Member

Saturday, April 28, 2018 - 9:00 a.m.

Torrance City Council Chambers 3031 Torrance Boulevard Torrance, CA 90503

#### AGENDA

Items are expected to be completed in the order listed below. However, items may be taken in any order.

1.	Welcome / Opening Remarks	Dr. Clark E. Parker, Sr. Committee Chair
2.	Introduction	<i>Wayne Nastri</i> <i>Executive Officer</i>
3.	Staff Presentation - Status Update of PR1410	Dr. Philip M. Fine Deputy Executive Officer Planning and Rules
4.	Health Effects from Exposure to Sulfuric Acid and Hydrofluoric Acid (HF)	Dr. Craig A. Merlic Professor Department of Chemistry and Biochemistry UCLA

5.	Elected Officials	(3 minutes each)
6.	Refineries	TORC Valero
		(10 minutes each)
7.	TRAA Presentation	Dr. Sally Hayati President (10 minutes)
8.	Union Representatives	(10 minutes)
9.	Public Comments Members of the public may address the Committee concerning any agenda item before or during consideration of that item (Govt. Code Section 54954.3). Speakers may be limited to one (1) minute each. The agenda for this meeting is posted at SCAQMD Headquarters, 21865 Copley Drive, Diamond Bar, CA, and Torrance City Council Chambers at 3031 Torrance Boulevard, Torrance, CA, at least 72 hours in advance of the meeting. At the end of the agenda, an opportunity is provided for public comment on matters within the Committee's authority.	(1 minute each)
10.	Refinery Committee Discussion	Committee Members

- 10. Refinery Committee Discussion
- 11. **Closing Remarks**

Adjournment

#### Document Availability

All documents (i) constituting non-exempt public records, (ii) relating to an item on the agenda, and (iii) having been distributed to at least a majority of the Committee after the agenda is posted, are available prior to the meeting for public review at the South Coast Air Quality Management District Public Information Center, 21865 Copley Drive, Diamond Bar, CA 91765, and will also be available at the meeting site on the day of the meeting.

*Committee Members* 

#### Americans with Disabilities Act

The agenda and documents in the agenda packet will be made available, upon request, in appropriate alternative formats to assist persons with a disability [Govt. Code Section 54954.2(a)]. Disability-related accommodations will also be made available to allow participation in the meeting. Any accommodations must be requested as soon as practicable. Requests will be accommodated to the extent feasible. Please contact Denny Shaw at 909-396-2386 from 7 a.m. to 5:30 p.m. Tuesday through Friday, or send the request to dshaw@aqmd.gov.



# Status Update on PR1410 – Hydrogen Fluoride Storage and Use at Petroleum Refineries



# SCAQMD REFINERY COMMITTEE

April 28, 2018 Torrance, California

# SUMMARY OF JANUARY 20<sup>TH</sup> 2018 REFINERY COMMITTEE MEETING

- SCAQMD staff presented initial rule concepts
- Approximately 100 speakers testified with almost an equal number of people supporting or opposing a ban of MHF
- Refinery Committee direction to staff:
  - Return to the Refinery Committee in 90 days
  - Work with key stakeholders to reach consensus
  - 8 year implementation timeframe is too long
  - If consensus cannot be reached, the Refinery Committee will direct staff on how to proceed

## SCAQMD MEETINGS SINCE THE LAST REFINERY COMMITTEE

### Torrance Refining Company (TORC)

SCAQMD staff February 7, 2018

SCAQMD technical staff March 7, 2018

> SCAQMD staff April 5, 2018



SCAQMD staff February 1, 2018

SCAQMD staff March 8, 2018

Dr. Parker and SCAQMD staff April 4, 2018

### Torrance Refinery Action Alliance

SCAQMD staff March 23, 2018

Dr. Parker and SCAQMD staff April 4, 2018

### SUMMARY OF STAFF'S INITIAL RULE CONCEPT



### **REFINERIES' RESPONSE TO INITIAL RULE CONCEPT**



### TRAA'S RESPONSE TO INITIAL RULE CONCEPT



KEY ISSUE #1 REFINERIES ASSERT THEY CANNOT CONVERT TO EMERGING TECHNOLOGIES BECAUSE THEY ARE NOT COMMERCIALLY AVAILABLE AND PROVEN

### **RESPONSE:**

- Sulfuric acid alkylation is commercially available
- Further demonstration of emerging technologies at scale is desirable
- Proposed Rule 1410 can include phase-out with:
  - Technology assessment
  - Participation of refineries in demonstration projects

## STATUS OF TECHNOLOGIES

### Sulfuric acid alkylation currently available

- Approximately 50 refineries in the nation use sulfuric acid alkylation units
- With the exception of TORC and Valero, all other California refineries use sulfuric acid
- Valero's refineries in Louisiana and Texas are completing installation of new sulfuric acid alkylation units

### • Emerging technologies

- Solid acid catalyst alkylation being used at a petrochemical plant in China Application is 2,700 bpd in 2015
- Ionic liquid catalyst at Chevron Salt Lake City refinery in Utah 5,000 bpd HF Alkylation conversion 2017 to 2020

KEY ISSUE #2 REFINERIES CANNOT SUPPORT A PHASE-OUT BECAUSE CONVERSION TO SULFURIC ACID WILL NOT GENERATE ANY RETURN ON INVESTMENT

### **RESPONSE:**

- In addition to capital and operating costs, the decision to phase-out MHF should consider public safety and health effects
- Difficult to quantify the financial impact of the risk associated with an off-site release of MHF
- TORC's Burns and McDonnell study<sup>1</sup> estimated the conversion cost of a sulfuric acid alkylation unit of \$600 million with an additional \$300 million for acid regeneration

### SULFURIC ACID ALKYLATION COST ESTIMATES



- Burns & McDonnell estimate included alkylation unit and post processing equipment Estimated Cost: \$600 Million
- SCAQMD staff and Norton
   Engineering agree post processing
   replacement not needed for
   conversion
   Estimated Cost: \$300 Million
- Installation at Valero more challenging than TORC due to space constraints

## POTENTIAL BENEFIT OF NEW TAX CUT AND JOBS ACT

- New Tax Cut and Jobs Act "full expensing" provision allows the deduction of 100% cost of investments from taxable income in every year for <u>up to five years</u>
- Estimated cost of sulfuric acid alkylation approximately \$300 million dollars Amortized over 5 years:

	Millions of Dollars	
	<b>Capital Expenses</b>	Tax Savings
Annual Average	~\$70	~\$15
Five-Year Total	~\$350	~\$75

 TORC's most recent turnaround cost was more than \$250 million – Extraordinary turnaround that included the majority of its refinery process units KEY ISSUE #3 A RULE THAT AFFECTS ONLY 2 REFINERIES GIVES A MARKET ADVANTAGE TO THE OTHER REFINERIES AND WILL INCREASE GASOLINE PRICES



### **RESPONSE:**

- Any impacts would be temporary
- Can incorporate a staggered implementation schedule to reduce supply impacts, if any
- Planned phase-out is different than an unplanned shutdown – less disruptive
  - Refineries can stockpile or purchase alkylate to minimize downtime
- Future California gasoline demand projected to decrease<sup>1</sup> minimizing potential supply impacts, if any

# ACCIDENTS HAPPEN

- "Near-miss" accident at Exxon Mobil in 2015<sup>1</sup>
  - 40 ton piece of electrostatic precipitator landed within 5 feet of the MHF acid settler
- Sulfuric acid alkylation accident at Tesoro Martinez in 2014<sup>2</sup>
  - Released 84,000 pounds of sulfuric acid injured two employees
- HF Release at Marathon Petroleum Corporation, Texas City in 1987<sup>3</sup>
  - Vapors emitted under pressure for over 2 hours
  - More than 1,000 people injured
- Explosion at Valero Texas City April 19, 2018<sup>4</sup>
  - Early reports stated fire erupted in refinery's depropanizer tower
  - Uncertain at this time if HF was released from alkylation unit



<sup>&</sup>lt;sup>1</sup> Chemical Safety Board - ExxonMobil Torrance Refinery Investigation Report, 2017

<sup>&</sup>lt;sup>2</sup> Chemical Safety Board - Tesoro Martinez Refinery Process Safety Culture Case Study, 2016

<sup>&</sup>lt;sup>3</sup> Texas City Journal; Where a Chemical Leak Seems an Acceptable Risk, 1987

<sup>&</sup>lt;sup>4</sup> San Antonio Business Journal; Fire at Valero's Texas City Refinery Remains Under Investigation, 2018

### TOP THREE U.S. REFINERIES USING HF/MHF ALKYLATION IN DENSELY POPULATED AREAS

### #1

Philadelphia Energy Solutions



#### Torrance Refining Company

#2



#### #3

Valero Wilmington Refinery



Alkylate: 26,500 BPD 298,000 People within 3 Miles Nearest Residence ~3,200 Feet Alkylate: 25,500 BPD 245,000 People within 3 Miles Nearest Residence 1,500 Feet Alkylate: 20,000 BPD 153,000 People within 3 Miles Nearest Residence ~4,100 Feet

# **RELATIVE RISK OF HF AND MHF**

MHF modestly increases rainout - HF exposure would still occur
Material Safety Datasheets for HF and MHF list the same hazards

Honeywell Material Safety Data Sheet MODIFIED HYDROFLUORIC ACID 1. CHEMICAL PRODUCT AND COMPANY IDENTIFICATION PRODUCT NAME: Modified Hydrofluoric Acid OTHER/GENERIC NAMES: MHF, Modified HF, Modified Hydrogen Fluoride, Modified HF Acid Additized HF Alkylation Catalyst MANUFACTURER: Honeywell International Industrial Products 101 Columbia Road Box 1053 Morristown, New Jersey 07962-1053 FOR MORE INFORMATION CALL: (Monday-Friday, 8:00am-4:30pm EST) IN CASE OF EMERGENCY CALL: HF Technical Service Department For Medical Emergencies 800-622-5002 Or visit the Honeywell HF website (24 Hours/Day, 7 Days/Week) http://www.HFacid.com 800-498-5701 For Transportation Emergencie 800-424-9300 (CHEMTREC for US) 2. COMPOSITION/INFORMATION ON INGREDIENTS 613-996-6666 (CANUTEC for Canada INGREDIENT NAME Hydrofluoric Acid Trace imposities and additional material names not listed above may also appear in the Regulatory Informativ transition of a statement of a s Trace impusities and additional material names not listed above may also appear in the Regulatory Information Sec towards the end of the MSDS. These materials may be listed for local "Right-To-Know" compliance and for other / WEIGHT 9 ction 15 EMERGENCY OVERVIEW: Clear, coloriess, corrosive fuming / EMERGENCY OVERVIEW: CRar, coloriess, corrosive turning liquid with an extremely actid odor. Forms dense while vapor clouds if released. Both liquid and vapor Attenticity acrist outor, Forms online white vapor chouds in reveased, form industry across severe burns to all parts of the body. Specialized medical treatment is require from an assessment.

**EMERGENCY OVERVIEW:** Clear, colorless, corrosive fuming liquid with an extremely acrid odor. Forms dense white vapor clouds if released. Both liquid and vapor can cause severe burns to all parts of the body. Specialized medical treatment is required for all exposures.

# CURRENT STAFF RECOMMENDATION FOR TWO POSSIBLE RULE APPROACHES

#### Option A: Tier 1+ Mitigation with Phase-out in 5 years

- "Tier 1+" Mitigation: Enhancements to existing and some automated mitigation implemented within 1 year
- Phase-out MHF no longer than 5 years
- Option B: Tier 1 and 2 Mitigation with Longer Phase-out
  - Tier 1 Mitigation: Enhancements to existing mitigation implemented within 1 year
  - Tier 2 Mitigation: Automated mitigation implemented within 2-3 years
  - Technology assessment in 2 years
  - Phase-out MHF no longer than 6 years
  - If technology assessment concludes additional time needed, phase-out MHF no longer than 8 years

# TWO POSSIBLE RULE CONCEPTS TO CONSIDER

