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September 18, 2018

William A. Burke, Ed.D,
Chair, SCAQMD Board
Dr. Clark E. Parker, Sr.
Chair, Refinery Committee
South Coast Air Quality Management District
21865 Copley Dr.
Diamond Bar, CA 91765

Dear Chairman Burke and Refinery Committee Chairman Parker:

I am writing on behalf of the Foreign Trade Association with regard to Proposed Rule (PR) 1410 and the possible ban or phase-out of Modified Hydrofluoric Acid (MHF).

I oppose banning or phasing-out Modified Hydrofluoric Acid (MHF) and encourage you to continue allowing its use.

Oil production and refining have been key components of California's economy for generations and remain important economic engines for the state, literally helping to power our high quality, mobile way of life.

According to the California Energy Commission, banning MHF could cause two Southern California refineries to cease operations—if this were to happen, the state would probably lose thousands of jobs, and it could cause higher gasoline prices at the pump for California residents, businesses, and government.

I understand that HF has been in use for over 250 years and many other industries also use this chemical to make common consumer products such as computers, cell phones, and pharmaceuticals. There are 89 U.S. refineries with alkylation units and of those, fifty use HF or MHF. Both California refineries use the modified version of HF (MHF).

California's refineries adhere to the strictest regulations in the world, including safety measures that protect their workers and the communities that surround them. PR 1410 should focus on enhancing these measures, while ensuring California refineries are able to remain in business to produce the fuels we need to sustain our economy and way of life.

Banning MHF is unnecessary and is the wrong approach to refinery safety. I respectfully urge you and the other SCAQMD Governing Board Members to oppose any such ban or phase-out.

Sincerely,

A handwritten signature in blue ink, appearing to read "Glenn Patton", is positioned below the word "Sincerely,".

Glenn Patton
FTA President, 2018