



January 30, 2019

The Honorable Dr. William Burke and Dr. Clark Parker
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765

Subject: Oppose To Any Ban or Phase-out of MHF and Recommend SCAQMD Move Forward with a MOU with Refineries Impacted

Dear Chairman Burke and Refinery Committee Chairman Parker:

On behalf of the Long Beach Area Chamber of Commerce, I am writing with regard to Proposed Rule (PR) 1410 and the possible ban or phase-out of Modified Hydrofluoric Acid (MHF). We have a long standing position of opposing any ban or phasing-out of Modified Hydrofluoric Acid (MHF). At this time, we encourage South Coast Air Quality Management District move forward with a Memorandum of Understanding (MOU) with the refineries impacted by the rule.

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 in Torrance and Wilmington – if this were to happen, the state would most likely lose thousands of local jobs, and it could cause higher gasoline prices at the pump for California residents, businesses, and government.

Banning the use of an already approved, highly regulated substance on the basis of unsubstantiated claims is unfair to workers, families, and communities – such as ours – across California. California's refineries adhere to the strictest regulations in the world, including safety measures that protect their workers and the communities that surround them. A MOU would allow mitigation concepts to be designed for each refinery which accommodates the unique footprint of each and takes into account that there is not a "one-size-fits-all" engineering solution.

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 and recommend you move forward with the MOU process.

If you have any questions at all about our position, I am available to discuss.

Sincerely,

A handwritten signature in black ink that reads "Randy Gordon". The signature is written in a cursive, flowing style.

Randy Gordon
President/CEO