



9/20/18

Chairman Burke and Refinery Committee Chairman Parker  
South Coast Air Quality Management District (SCAQMD)  
21865 Copley Drive  
Diamond Bar, CA 91765

## RE: PR 1410 – BizFed Support for an MOU and Opposition to MHF Ban

Dear Chairman Burke and Refinery Committee Chairman Parker:

We are writing you on behalf of BizFed, the Los Angeles County Business Federation. We are an alliance of over 170 business organizations who represent over 390,000 employers with 3.5 million employees in Los Angeles County. We are writing in regards to Proposed Rule (PR) 1410, and recommend the SCAQMD move forward with a Memorandum of Understanding (MOU) with the refineries impacted by the rule as opposed to a phase-out/ban of Modified Hydrofluoric Acid (MHF).

As you are well aware – BizFed strongly **OPPOSES** the phase out of Modified Hydrofluoric Acid (MHF). The Torrance and Valero refineries in the South Bay have served Los Angeles County residents well - supplying hundreds of jobs, millions of dollars in taxpayer revenue, and low gas prices that keep our lives moving. There has never been a single release of MHF at either of the refineries. The refineries already adhere to strict standards and are not opposed to working with cities, residents and regulatory bodies to ensure that the refinery is even safer. The refineries have demonstrated their commitment to this by already implementing safety measures and diligently working with the district and staff to ensure safety at the refineries.

Banning MHF will lead to the loss of these refineries and result in higher gas prices, the loss of jobs and less revenue for important public services. If safety is the primary concern of the committee – we suggest continuing to work with the refineries to enhance safety measures instead of an unnecessary ban that will dramatically impact the economics of the region. Los Angeles County residents cannot afford the loss of these two refineries.

We believe that the MOU is the best solution forward to make sure that our refineries continue to operate for years to come. We **support** the MOU for the following reasons:

- A MOU allows mitigation concepts to be designed for each refinery;

**BizFed's Member Alliance**  
Action Apartment Association  
AIA - Los Angeles  
Airlines for America  
Alhambra Chamber  
American Beverage Association  
American Hotel & Lodging Association  
Antelope Valley Board of Trade  
Angeles Emeralds  
Apartment Association, California Southern Cities  
Apartment Association of Greater Los Angeles  
Arcadia Association of Realtors  
Asian Business Association  
Association of Independent Commercial Producers  
Azusa Chamber  
Beverly Hills Chamber  
Beverly Hills / Greater LA Association of Realtors  
BNI/SUCCESS  
Burbank Association of Realtors  
Building Industry Association, LA / Ventura Counties  
Building Owners & Managers Association, Greater LA  
Business & Industry Council for Emergency Planning & Preparedness  
CalAsian Chamber  
California Apartment Association, Los Angeles  
California Asphalt Pavement Association  
California Business Roundtable  
California Cannabis Industry Association  
California Construction Industry and Materials Association  
California Contract Cities Association  
California Employers Association  
California Fashion Association  
California Grocers Association  
California Hotel & Lodging Association  
California Independent Oil Marketers  
California Independent Petroleum Association  
California Life Sciences Association  
California Metals Coalition  
California Restaurant Association  
California Small Business Alliance  
California Sportfishing League  
California Trucking Association  
CALInnovates  
Carson Chamber of Commerce  
Carson Dominguez Employers Alliance  
CDC Small Business Finance  
Central City Association  
Century City Chamber of Commerce  
Cerritos Chamber  
Citrus Valley Association of Realtors  
Construction Industry Air and Water Quality Coalitions  
Consumer Healthcare Products Association  
Council on Trade and Investment for Filipino Americans  
Downey Association of Realtors  
Downtown Long Beach Alliance  
Downtown Pomona Owners Association  
El Monte/South El Monte Chamber  
Employers Group  
Engineering Contractor's Association  
F.A.S.T.-Fixing Angelinos Stuck In Traffic  
FilmLA  
Foreign Trade Association  
FuturePorts  
Gateway to LA  
Glendale Association of Realtors  
Glendale Chamber  
Glendora Chamber  
Greater Antelope Valley AOR  
Greater Lakewood Chamber  
Greater Los Angeles African American Chamber  
Greater Los Angeles New Car Dealers Association  
Harbor Association of Industry and Commerce  
Harbor Trucking Association  
Historic Core BID  
Hollywood Chamber  
Hong Kong Trade Development Council  
Hospital Association of Southern California  
Hotel Association of Los Angeles  
Independent Cities Association  
International Manufacturers Council  
International Warehouse Logistics Association  
Investing in Place  
Irwindale Chamber  
Japan Business Association of Southern California  
La Canada Flintridge Chamber  
LAX Coastal Area Chamber  
League of California Cities  
Local Search Association  
Long Beach Area Chamber  
Los Angeles Area Chamber  
Los Angeles Cleantech Incubator  
Los Angeles County Bicycle Coalition  
Los Angeles County Board of Real Estate  
Los Angeles County Waste Management Association  
Los Angeles Gateway Chamber of Commerce  
Los Angeles Gay & Lesbian Chamber of Commerce  
Los Angeles Latino Chamber  
Los Angeles Parking Association  
Maple Business Council  
Motion Picture Association of America  
MoveLA  
NAIFA - OC  
NAIOP Southern California Chapter  
National Association of Royalty Owners  
National Association of Tobacco Outlets  
National Association of Women Business Owners  
National Association of Women Business Owners, LA  
National Hispanic Medical Association  
National Latina Business Women's Association  
Netherlands-America Foundation  
Orange County Business Council  
Pacific Merchant Shipping Association  
Pacific Palisades Chamber  
Panorama City Chamber  
Paramount Chamber of Commerce  
Pasadena Chamber  
Pasadena-Foothills Association of Realtors  
PhRMA  
Planned Parenthood Southern California Affiliates  
Pomona Chamber  
Rancho Southeast Association of Realtors  
Recording Industry Association of America  
Regional Black Chamber - San Fernando Valley  
Regional San Gabriel Valley Chamber  
Rosemead Chamber  
San Gabriel Chamber  
San Gabriel Valley Civic Alliance  
San Gabriel Valley Economic Partnership  
Santa Clarita Valley Chamber  
Santa Clarita Valley Economic Development Corp.  
San Pedro Peninsula Chamber  
Santa Monica Chamber  
Santa Monica Junior Chamber  
Sherman Oaks Chamber of Commerce  
South Bay Association of Chambers  
South Bay Association of Realtors  
Southern California Contractors Association  
Southern California Golf Association  
Southern California Grantmakers  
Southern California Minority Supplier Development Council Inc.  
Southern California Water Coalition  
Southland Regional Association of Realtors  
The Young Professionals at the Petroleum Club  
Torrance Area Chamber  
Town Hall Los Angeles  
Tri-Counties Association of Realtors  
United Chambers San Fernando Valley  
United States-Mexico Chamber  
Unmanned Autonomous Vehicle Systems Association  
US Resiliency Council  
Valley Economic Alliance  
Valley Economic Development Corp.  
Valley Industry & Commerce Association  
Vernon Chamber  
Vietnamese American Chamber  
Warner Center Association  
West Hollywood Chamber  
West Los Angeles Chamber  
West San Gabriel Valley Association of Realtors  
West Valley Warner Center Chamber  
Western Manufactured Housing Association  
Western States Petroleum Association  
Westside Council of Chambers  
Westwood Village Rotary Club  
Wilmington Chamber  
World Trade Center  
Young Professionals in Energy - LA Chapter

- A MOU is the best approach to quickly implement safety technology enhancements;
- A MOU accommodates the unique footprint of each refinery and takes into account that there is not a "one-size-fits-all" engineering solution.

We respectfully urge you and the other SCAQMD Governing Board Members to support the installation of enhanced safety measures and to implement them through a MOU to achieve timely and tangible safety benefits, while preventing the negative economic consequences a MHF ban or phase-out could cause.

Thank you.

Sincerely,



Hilary Norton  
BizFed Chair  
Fixing Angelenos  
Stuck in Traffic (FAST)



David Fleming  
BizFed Founding Chair



Tracy Hernandez  
BizFed Founding CEO  
Impower, Inc.

CC:  
SCAQMD Refinery Committee;  
Wayne Nastri;  
Philip Fine;  
Michael Krause;  
Susan Nakamura