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August 23, 2018

Governing Board Chairman William A. Burke
South Coast Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765
CC: SCAQMD Governing Board Members

Re: SUPPORT for the elimination of MHF and HF alkylation within four years of PR 1410 adoption

Dear Chairman Burke:

I am writing to convey SEIU Local 721's support for a Proposed Rule 1410 that replaces hydrofluoric acid (HF) and modified HF (MHF) alkylation with a safe alternative within four years of rule adoption. Over 95,000 workers comprise the membership of SEIU Local 721 - making it the largest public sector union in Southern California. SEIU Local 721 represents people working in hospitals, foster care, mental health, courts, law enforcement, libraries, street services, beach maintenance, sanitation, water treatment, parks services and watershed management. Our members understand the importance of the political process and how it directly impacts them both on the job and in their communities.

The South Bay and Harbor areas have been trying to eliminate HF alkylation dangers for three decades; that's long enough. According to the Chemical Safety Board, a catastrophic MHF release nearly occurred Feb. 18, 2015. If things had gone a bit differently, a lethal HF cloud would have hit 23 schools and innumerable residences and businesses all the way to the Redondo pier. Mass casualties could have occurred. "Ash" from the explosion fell over a wider area, so HF exposure could have occurred within an even larger region. Tens of thousands would have required immediate medical treatment for possible HF exposure. Panic and evacuations would have followed. Our economy and property values would have crashed; unplanned shutdowns of the MHF alkylation units at both refineries would ensue. All this would cause far greater suffering, damage, gas price hikes and disruption to California's economy than an orderly planned MHF replacement will.

A MHF release is no farther away than the next powerful earthquake. Millions of Southern California residents are unnecessarily at risk, because three safe commercially available alternatives exist. With a little planning, California drivers and our economy will not suffer during the temporary disruption a MHF replacement will entail.

The Torrance refinery has experienced repeated explosions, chemical releases, and fires in the last several years. Valero has reported measurable MHF/HF releases every year. HF risk is unacceptable in our densely populated area. Time is of the essence. I urge the SCAQMD to expedite the rulemaking process and adopt a timely replacement or cessation of MHF and HF alkylation to protect refinery workers, residents, and the California economy.

Thank you for undertaking this important rulemaking process.

Sincerely,



Bob Schoonover

SEIU Local 721 President