

January 18, 2018



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

Dear Drs. Burke and Parker

Thank you for the opportunity to submit this letter and provide comments on behalf of the Wilmington Chamber of Commerce and our Business members. We are highly concerned about the South Coast Air Quality Management District's proposed ban of modified hydrofluoric acid (MHF) (PR 1410).

A ban on modified hydrofluoric acid could have a devastating impact to our Local economy resulting in the loss of thousands of high-paying local jobs, an increase in the prices for gasoline and consumer goods for all Californians. Stillwater Associates, LLC [Presentation "Impact on HF Ban on Southern California Transportation Fuels Supply."](#) Furthermore, based on the presentation by the California Energy Commission presented at the last Working Group meeting in September 2017, the report concluded that "refiners are unable to simply replace one catalyst with another. Alkylation units would have to be replaced, leading to uncertainty regarding: ability to continue operating MHF units, timing and outcome associated with the permit process, and economic viability of MHF alkylation replacement requirement."

"Loss of alkylation output (and reduced production from other refinery process units) will decrease the local and state supply of gasoline (and other refined products) for at least two years." This needs to be considered. As much as 25% of our fuel could need to be imported. Does anyone think that importing fuel produced in China or India into California is good for our economy or environment? HF has been used in manufacturing for over 250 years and 50 out of 89 refineries in the U.S. uses HF or MHF, which has proven to be safe and effective.

We are opposed to any ban of MHF!

Sincerely,



Dan Hoffman
Executive Director

CC: Mr. Wayne Nastri, Executive Officer
Dr. Phil Fine, Deputy Executive Officer Rule Development
Ms. Denise Gazaro, Clerk of the Boards