



April 27, 2018

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

Greetings Chairman Burke and the SCAQMD Governing Board:

We are writing to convey Health Care for All - Los Angeles's support for a *Proposed Rule 1410 that replaces modified HF (MHF) alkylation with a safe alternative within four years of rule adoption*. The initial rule concept presented by the SCAQMD on 1/20/2018 is not acceptable. HF mitigation systems *cannot protect* our densely populated areas. There are no failsafe mitigation measures; an eight- year transition is far too long.

As the Los Angeles Chapter Directors of an organization with a commitment to health and well being of all California residents, we are concerned that a MHF release could have devastating health effects on our population. Our members reside throughout the Los Angeles area including the South Bay and adjacent communities. While our specific advocacy is health care reform for a more equitable and accessible system, we are in solidarity with all efforts advocating for the protection of human

health and the promotion of a sustainable secure existence for all residents.

As a registered nurse formerly employed by the LA County Department of Health Services in Public Health Clinics and as a disaster responder to Hurricane Katrina, I have seen first hand the health problems resulting from community neglect, lack of adequate administrative planning and the ensuing environmental devastation. In addition, I am a native of the south bay area and remember the oil storage tank fires raging for months in 1967 blackening the sky with oil residue and creating respiratory hazards for many residents, young and old. I currently have family, friends and former neighbors residing in several south bay communities. My grandchildren are living not far from the Torrance Refinery.

Our generation has witnessed the widespread and long term disasters of Hiroshima, Agent Orange, Depleted Uranium contamination, Love Canal, Chernobyl, Bhopal, Nuclear Testing fallout cancer clusters, numerous mine disasters and a variety of explosions involving toxic chemicals. Too often responsible agencies have not done the job of protecting people from these threats. Because we possess the knowledge to circumvent this specific potential disaster at the Torrance Refinery, it is imperative that every measure to create the safest environment possible is adopted to protect human life and health. We urge you to adopt Rule 1410 as a responsible alternative to the initial rule.

If accidentally released, HF and MHF become airborne in a dense, ground-hugging fog that could cause death or irreparable injury for miles. The South Bay and Harbor areas and beyond are at risk. This is unacceptable and *unnecessary*, since three safe alternatives exist. HF is especially hazardous because it is a systemic poison. Severe delayed symptoms can arise after relatively minor exposure. This increases the burden on medical response teams and on the facilities necessary to care for an

injured population. Given our high population density delivering the immediate treatment needed by survivors would be an insurmountable challenge.

As we have seen with the ubiquitous presence of strontium 90 in US children from the nuclear testing of the 1950's, children are especially susceptible to toxins and face even greater danger from MHF than adults. Their sensitivities are not reflected in HF toxicity ratings. Children are more susceptible to contaminants like HF which is absorbed through the skin. They receive larger doses from the same exposure because of greater lung surface to weight, and are more vulnerable because of the smaller diameter of their airways and their faster respiration rate.

Over the 64 years my family has lived near the Torrance Refinery there have been repeated safety issues and the 2015 explosion was a near-miss on 50,000 lb. MHF that could have been *catastrophic*, according to the Chemical Safety Board. The EPA investigation into the Torrance refinery's RMP report found the MHF risk zone is significantly understated and that the HF risk distance should apply instead. MHF alkylation must be eliminated before a MHF release causes a disaster of Bhopal like proportions in the South Bay or Harbor areas.

If a moderate to severe MHF release occurs, the human toll would be enormous. We cannot in good conscience allow a dangerous situation of this magnitude to threaten our population. Government agencies, especially the SCAQMD, are charged with the responsibility to regulate for the safety and security of our residents.

It is our hope that you will fulfil the requirements of your commission to safeguard the public good and to honor the basic human rights of all to live in a more secure environment, minimizing serious hazards that threaten our health and well being. We urge you to act now and adopt rule 1410. It is the right thing to do.

Sincerely,

Maureen Cruise RN, Director & Co Chair  
on behalf of Kirsten Magnuson, Director & Co Chair  
Health Care for All - Los Angeles Chapter