



Torrance Refinery Action Alliance

Comment - Proposed Amendment to RMP Rule CRF 40 68

Torrance Refinery Action Alliance (TRAA), <https://traa.website/> was launched in the South Bay region of Los Angeles County after an explosion at the then ExxonMobil refinery on February 18, 2015 nearly release a massive amount of highly toxic hydrogen fluoride (HF) into the community. HF is used in 43 refineries in 20 states in the US. If adopted and fully implemented, TRAA's proposed amendment to EPA's Risk Management Plan (RMP) would require the conversion of all HF refineries to a vastly safer alternative within four years.

FUNDAMENTAL ARGUMENTS FOR URGENT ACTION TO PHASE OUT HF

1. An exceptionally hazardous substance, HF used in large quantities in refineries which have historically been subject to large explosions, and are additionally at risk for future accidents, natural disasters, or intentional acts.
2. Forming low-hanging toxic clouds, HF puts large populations at risk for imminent death or serious injury for many miles.
3. Communities surrounding HF Alky units rank high for environmental justice burden per the EPA's EJSCREEN
4. The numerous near misses as well as actual massive releases, narrowly averting human population = alarms bells!
5. Communities surrounding HF Alky units contain workforces important for National Defense & Economy
6. Mitigations have been shown to be insufficient to prevent a mass release (per US CSB report on Philadelphia Refinery explosion).
7. There are 5 vastly Safer Alternative Technologies actively marketed by large multinational corporations
8. Local regulatory attempts have failed to date, thus requiring Federal action.
9. So-called "Modified HF" used by a few refiners is essentially similar to and as dangerous as HF
10. Truck transport of HF over 1000s of miles each week puts 100s of communities at risk, along with 1000s of local first responders, who may not be equipped to handle such a dangerous chemical.
11. Large number of highly respected organizations, regulatory bodies, elected officials, and general population have urged special attention to require conversion to vastly safer commercially available chemicals.
12. Phase 1 of this Rule, aimed at initiating steps to effect HF conversion of all HF alkylation units deemed to meet the establish criterion, could be funded with infrastructure funds.