



**Torrance Refinery Action Alliance,
4733 Torrance Blvd. #200, Torrance, Ca 90503**

February 6, 2022

Attention: Members, House Energy and Commerce Committee

Chair Cathy McMorris Rodgers, House Energy and Commerce Committee

Jeff Duncan, Energy, Climate, & Grid Security Subcommittee Chair

Bill Johnson, Environment, Manufacturing, & Critical Materials Subcommittee
Chair

Frank Pallone Jr., Ranking Member of the Energy, Climate, & Grid Security
Subcommittee

Rep. Diana DeGette, and Ranking Member of the Environment,
Manufacturing, & Critical Materials Subcommittee

Rep. Paul Tonko

I speak to you from a non-partisan community organization that is dedicated to protecting the community and refinery workers at Hydrogen Fluoride (HF/MHF) refineries by bringing about conversion to a vastly safer alternative technology in the alkylation process.

The Torrance Refinery Action Alliance (TRAA) was formed after a "near miss" for a mass release of HF/MHF in Torrance California Feb 18, 2015. A multi-ton piece of equipment flew through the air and landed about six feet away from a large tank of HF. A major release could have resulted in mass casualties in numbers similar to what occurred in Bhopal India in 1984 (the release of a different chemical – but with similar properties resulted in 15,000 dead and over 100,000 people injured.) In all communications with the public and with members of the House of Representatives, TRAA endeavors to only use statements made or confirmed by industry or government.

A proposed bill under consideration by your committee Section 112(r)(7)(B) of the Clean Air Act (42 U.S.C. 7412(r)(7)(B)) states "... The owner or operator of a stationary source described in subclause (II) shall not be required by the regulations under this subparagraph to include in any hazard assessment under clause (ii) an assessment of safer technology and alternative risk management measures

applicable to eliminating or reducing risks from the use of hydrofluoric acid in an alkylation unit. "

There are at least six commercially proven alternative technologies available for conversion. These alternatives are being actively marketed by Chevron/Honeywell, KBR, Well Resources, and Lummus Technologies.

HF is an exceptionally dangerous chemical used in massive quantities in refineries that inherently have the potential for explosions and are also vulnerable to natural disasters and terrorist attacks. Given the risk associated with its use, it is unfair to communities to allow refineries to continue its use when there are alternatives available. There are 40 such refineries with an estimated 14 million people living within the circles of risk.

It also seems unfair to the companies that have, at great expense, developed and installed alternatives that are vastly safer. Under this bill, the HF refineries would not even have to assess whether these products would save them money and save the community worry and perhaps death and economic ruin.

Vendors of the alternatives state:

1. Alternative methods are inherently safer
2. Alternative methods are more energy efficient
They produce more alkylate than HF does with the same feedstock, and have greater feedstock flexibility.
3. Alkylation will be increasing in market demand in the coming decade,
4. Alternatives reduce cost by eliminating construction, maintaining safety mitigations, reporting on Risk Management Plan, and the cost of training staff in the danger and preventative processes.
5. Of course it saves the cost of liability (generally self-insured) from a corporate apocalypse resulting from the unlikely but extremely consequential result of a release.

(There have been at least six major near misses in US refineries and at least two foreign releases resulting in significant fatalities.)

Although the three Committee Chairs; Rodgers, Duncan, and Johnson do not have HF refineries in their District, there are about 10 members of the committee who do. The American Petroleum Institute states there are "Commercially Proven Alternatives" - API also says that converting would be prohibitively expensive. However since other refineries have converted,

apparently it is not prohibitively expensive. Vendors of Alternatives say that down time for a conversion would be comparable to a normal turnaround. **It seems that this is a good business decision. It seems that upgrading is a good business plan by these refineries and would likely reduce gas prices and improve profitability. The committee should draft legislation that would drive conversion with maximum speed.**

For the 10 Congressmembers who have HF in one of the refineries in your district, your communities as well as the oil industry as a whole would be greatly served by assessing the alternatives and Incentivizing HF users to convert to one of the commercially proven alternatives with all possible haste. (You may have other refineries in your district, and it is very likely that they do not use HF but an alternative to HF for Alkylation),

As Fukushima event resulted in the sudden closing of numerous nuclear plants, a major release of HF with mass casualties would likely disrupt the continued use of HF in many if not all of the HF refineries in the US. The risk of this disruption to the US Energy Supply is unacceptable and can only be removed by assessing and requiring conversion from HF to one of the major corporate alternative technologies.

To exclude hazard assessment would be to the detriment of the corporations who are marketing the alternatives. Of course, the public safety and the benefits of transparency for concerned community members is served best by assessing dangers and alternatives but as well, the energy dominance sought by this amendment is also well served by an industry wide upgrade from this antiquated alkylation technology.

We urge your committees to correct this grave error, and not eliminate Hazard and Safer Technology Alternatives Assessment but add to the bill incentives that will result in HF refineries upgrading from this exceptionally hazardous and out of date technology.

We have attached material which supports this argument, we are available for further communication at info@traa.website, WWW.TRAA.Website

Sincerely,

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San Pedro Rotary Club, PP Hawthorne 2006-07
[HF release video at now closed Philly refinery \[Link\]](#)

Attached or included

1. A brief summary statement on HF/MHF by TRAA

HF is an exceptionally hazardous chemical capable of causing thousands of casualties, is used in large quantities in only 27% of US refineries. Refineries are vulnerable to accidents (many have occurred) natural disasters (near misses) and terrorist acts (unknown). There are multiple vastly safer commercially proven alternatives. Not only should HF not be exempt from Hazard Analysis but this bill should carry a bi-partisan amendment requiring a 3rd party assessment of alternatives and subsequent conversion be prioritized over a short period of time."

2, **Fact sheet summary** with links to key government/industry videos about the exceptional danger.

3. Additional Risks to **National Security Concerns** - from experts

4. Description of the **alternatives** - from industry vendors

5. Presentation **by API** to OMB (stating "commercially proven alternative" - but does have some misstatements)

7. A power point for a quick review of HF, its dangers and the cost savings alternatives

For a link to in depth review - Science Panel Blog WWW.TRAA.blog

- www.TRAA.website