The Honorable Dr. William Burke  
Chair, Governing Board  
The Honorable Larry McCallon  
Chair, Refinery Committee  
South Coast Air Quality Management District  
21865 Copely Drive  
Diamond Bar, CA 91765

RE:  **Opposition to Ban or Phase-out of Modified Hydrofluoric Acid (MHF) and Support Safety Enhancements through Memorandum of Understanding**

Dear Chairman Burke and Refinery Committee Chairman McCallon,

On behalf of the Los Angeles Area Chamber of Commerce, I am writing to express our support for the South Coast Air Quality Management District (SCAQMD) to move forward with a Memorandum of Understanding (MOU) with the refineries impacted by Potential Rule (PR) 1410.

The Chamber supports an MOU over PR 1410 because it will:
- Allow mitigation concepts to be designed for each refinery;
- Be the best approach to rapidly implement safety technology enhancements;
- Accommodate the unique footprint of each refinery and take into account that there is no “one-size-fits-all” engineering solution.

If adopted, the Proposed Rule 1410 would drastically alter the operations of two local refineries by forcing them to implement radically different refining methods to produce gasoline that meets California’s stringent fuel requirements. According to the California Energy Commission, a transition of this magnitude would likely cause these two refineries to cease operations, which would have severe ramifications for our community.

These refineries employ hundreds of people in good paying jobs, a permanent closure or reduction in workforce would have significant ramifications for the local economy. More broadly, if implemented, residents and businesses could soon be paying 26 cents more per gallon of gas, raising the costs of food, transportation and a variety of basic needs.

Increased business and commuting costs, compounded with job losses is not good for the economic health of our region. For these reasons, we strongly urge SCAQMD to move forward with an MOU with the two refineries and oppose PR 1410.

Sincerely,

Jessica Duboff  
Vice President, Center for Business Advocacy