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Letter to the Carson Community:**USW Members Committed to Safety at Torrance Refinery**

United Steelworkers Locals 675 and 407 proudly represent 320 members who work at the Torrance Refinery and related logistics operations in Southern California.

We are your neighbors. We live and volunteer in local communities. Our children go to nearby schools and enjoy playing in local parks. Our families and neighbors are among the reasons why everyone in the USW is committed to operating the refinery safely.

We know you want to live in a safe community - similarly we want to work in a safe workplace, so safety is a priority we share with you.

Torrance Refining Company LLC (TORC), the operator of the Torrance refinery, is committed to working closely with us and each job our members perform involves safety. TORC listens – we talk about operations and our voices are heard and respected. As part of their commitment to improving reliability, the company invested more than \$200 million in the refinery earlier this year. Now they are investing in our members through an extensive training program.

Just like some other members of the community, we are concerned about the hydrofluoric acid (HF) that some refineries use as an alkylation catalyst. However, Torrance uses a safer form of catalyst called modified hydrofluoric acid (MHF).

The safety and use of MHF has been the subject of speculation and misrepresentation by this newspaper, certain public officials, and community activists, none of whom have any refining experience.

In contrast, the USW is well-qualified to understand the risks and explain our position on this complex technical issue because we have been monitoring technical developments related to alkylation for 70 years. Today we have 7,000 members working in 28 refineries that utilize alkylation catalysts based on HF, which includes both “HF” and “MHF.”

Our members work with MHF on the Torrance alkylation unit. We know MHF has an effective additive that prevents the mixture from vaporizing if accidentally released. Instead, the additive helps form droplets that fall to the ground as a liquid, rather than creating a vapor cloud. Barriers at Torrance also stop MHF from forming a cloud.

There are about 140 refineries in the U.S. today and 89 of them have alkylation units for making cleaner-burning gasoline. Fifty of them use either HF or MHF as a catalyst, while 39 use sulfuric acid, which is also extremely dangerous. If Torrance switched to sulfuric acid, as some suggest, more than 1,400 tanker trucks carrying sulfuric acid would travel past Torrance homes, churches and schools every month, versus six trucks today.

Despite claims by others who are unauthorized to speak on our behalf, since 2013 we have been recommending that refineries switch from HF to the MHF used by the Torrance and Valero Wilmington refineries today.

This newspapers and local activists have attempted to discredit the effectiveness of MHF by attacking the scientific testing, modeling, and related data that support MHF, as well as the people involved in those initiatives. However, results of these research findings were reviewed and affirmed by a highly-qualified, independent court-appointed Safety Advisor and consultants for the City of Torrance Fire Department. The Safety Advisor’s recommendation to the

Court became the basis for the Consent Decree governing the Torrance refinery that requires MHF to be used in the alkylation unit, an agreement that is still in effect. Additionally, the South Coast Air Quality Management District (AQMD) issued air permits to the Torrance refinery in 1997 and Valero Wilmington refinery in 2007 to allow the use of MHF as an alkylation technology.

There’s never been a refinery anywhere in the world that converted from MHF to sulfuric acid alkylation. In our opinion, if AQMD now requires refiners to build or convert to sulfuric acid alkylation, the decision would lead to shutdowns of both refineries, forcing the loss of thousands of direct and indirect jobs. And there’s no guarantee an air permit would be issued because sulfuric plants create more emissions than MHF alkylation units.

In a report on the AQMD website, the California Energy Commission estimates that motorists and businesses would pay added costs of \$5.6 billion if the refineries shut down. This would be similar to 2015 and 2016 when Torrance was partially shut down following an incident under prior ownership, when California had to rely on fuel imported from other regions and countries to meet demand.

For these and other reasons, the USW and its South Bay locals oppose forcing either refinery to build a sulfuric acid alkylation plant.

Although two promising alternatives we support have been in development for decades, licensors of both technologies reported at the August 2nd AQMD meeting that neither process is commercially proven. We also confirmed through reputable labor and industry sources there is no solid acid catalyst alkylation unit in the UK, despite erroneous claims by an AQMD consultant.

The AQMD seems to have forgotten their own findings and agreements supporting MHF, which they termed an “environmental justice initiative” when Valero agreed to voluntarily convert its Wilmington HF alkylation unit to MHF in 2003. Former AQMD Executive Officer Barry Wallerstein praised the “enforceable agreement” in the District’s 2003 news release:

“Once (Wilmington) stops using concentrated hydrogen fluoride (HF), we will have virtually eliminated the potential for a catastrophic accidental release of this compound in our region.”

“Switching to modified HF will minimize the possibility of a catastrophic accidental release not only at the refinery, but along Southland transportation corridors, as the additive is added to the chemical before shipping.”

The record shows the Torrance refinery alkylation unit has been safely operating without any offsite HF release since 1966 when the unit started up, through the Sylmar (1971) and Northridge (1994) earthquakes, and 20 years of MHF use since 1997.

Our members are proud to make the cleanest gasoline, jet fuel, and diesel in the world, literally fueling California’s economy and our quality of life. We work with MHF every day and know the additive is safe and effective. The USW will continue supporting our members and their families while promoting MHF alkylation as the safest alkylation catalyst available until an inherently safer and commercially viable alternative is proven, available, and cost-effective.

