GUEST COMMENT

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For years, the US Environmental Protection Agency (EPA) has overseen a regulation known as the Risk Management Plan (RMP). The RMP is a safety performance standard that applies to fuel refineries and a litany of other US manufacturers that use high volumes of certain chemicals. RMP sites are expected to make continuous investments and improvements in safety performance, which is a good thing. Refiners fall under RMP jurisdiction for several chemicals, two of which are catalysts that facilities use to produce alkylate – an irreplaceable component in the cleanest US gasoline and high-octane aviation gas. It is because of alkylate and the EPA's upcoming proposal to change the RMP that the Biden administration might soon find itself making an unforced energy error.

The two primary and commercially-proven catalysts that refiners use to produce alkylate are hydrofluoric acid (HF) and sulfuric acid. Both are on the RMP list, but HF tends to draw more attention and is the focus of major refinery safety investments, training, and risk mitigation technology.

Refiners account for less than 2% of global HF consumption. HF is near ubiquitous in large-scale manufacturing. It is used in agriculture and also to produce computer chips, refrigerants, hydrogen fuel cells, pharmaceuticals, branded aluminium cans, and even drinking water. Even still, HF in fuel manufacturing draws a disproportionate share of regulatory interest.

The EPA's RMP proposal is expected to single out HF alkylation at fuel refineries, and saddle facilities with an expensive, unconstructive new paperwork burden. Regulators know full well that requiring alternative alkylation technology assessments at refineries that are already up and running will consume valuable man hours, impose significant costs, and yield nothing in terms of actionable results or safety improvements. The point is simply to put a barrier in the way of HF alkylation. This is precisely what some anti-refining groups are lobbying for.

A loss or major reduction in HF alkylation would have devastating consequences for US and global fuel supplies and for affordable energy advocates everywhere. Most policymakers have no idea that those are the stakes with the RMP.

Nearly half of the alkylate produced in the US is made with HF catalyst. Refineries with HF alkylation units account for nearly 40% of US fuel manufacturing. Facilities cannot seamlessly transition from one alkylation technology to another. It is a massive undertaking that could approach US$1 billion – a cost so extreme that it could push some refineries to close. Even if a transition was feasible, safety would not be better served. Alkylation risk would simply be shifted to other parts of the supply chain.

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Those who oppose HF alkylation wrongly believe that allowing use of this technology means compromising on safety. Refiners do not accept that. We have done more than any other industry to formalise and evolve HF safety guidelines, such as through API Recommended Practice 751. Our safety procedures are consistently reviewed and enhanced every few years as we gather intel from real-world experiences and capitalise on advancements made in risk-reducing technologies.

Because of all the steps that refiners take to keep employees and community neighbours safe, HF alkylation units pose less life-threatening risk to their local public than vehicle collisions, lightning strikes and sharp objects, just to name a few. When refiners say safety is our priority, we mean it.

EPA regulations must reflect how thoroughly HF is managed by US refiners. Policy that incorrectly presumes the opposite could put in jeopardy significant US fuel manufacturing, and our ability to produce the cleanest possible gasoline and aviation fuels in the US. The effect for consumers would be tighter fuel supplies and potentially higher prices. There is no way that could be considered a win by the Biden team.