April 8, 2005

Review and response to JCI letter dated Feb. 17, 2005. 1)

Hazard Assessment

Documents reviewed

Dated	Description
2/17/05	JCI letter 2/17/05
4/16/04*	JCI - PHA * As noted in the 50217 JCI letter, this is the same PHA sent to ~~EPA~~ (by JCI) on Aug. 19, 2004. and reviewed by...
5/7/2003 30507_JCI	JCI internal memo ~~addressing~~ reviewing "Recent CSB Cl_2 findings", specifically transfer hose, emergency shutdown and response issues associated with a Cl_2 release in 2002 (@ a competitor's facility).
6/8/2004 40608_LFR to ~~40~~ JCI	Letter report from LFR to JCI RE: OCA analysis for JCI (11 facilities). - ~~Re~~ Recvd by EPA on August 23, 2004.
9/3/2004	Letter of responses from JCI to EPA (KA) (EPA letter dated 9/1/04) which discusses the hazard assessment process @ JCI - JCI personnell defined a number of ARSceanarias and LFR modeled the sceanarias w. RMP* Comp.

H/A Documents

Cont'd on Next pg/

also IFR determined pop. impacts.

April 8, 2004

Haz. Assessment (Cont'd) 2)

The documentation received on 2/22/2005 [50217_JCI] was reviewed and found to be fundementally the same ~~information~~ data as was supplied by JCI on Sept. 23, 2004 [50923_JCI].

From ~~To~~	To	Descript.
40819_JCI	40823_EPA	- Copy of PHA dated 4/16/2004. - Copy of OCA done by LFR [48608_LFR] - Copy of Description of WOS/ARS provided to LFR. Undated + titled but list WOS/ARS alternatives for 11 facilities that JCI wanted LRR to analyze.
50217_JCI		Letter of transmittal of docs to KH [Rec'd 02/22/2005]. Cover letter plus 10 attachments. Cover letter, ~~and~~ attach. 1 and 2 relevant to Haz. Assessment review.

Reviewed original copy received 9/23/04. → Attach 1 - PHA 4/16/04

HA / Documents

April 8, 2005

Haz. Assess. (ctd) 3)

Cover letter supplemented the PHA by providing references to sections of the PHA linked to the haz. assess.

- Attch. 2 JCI internal e-mail [30507_JCI].

PHA Documents

April 8, 2005

Haz. Assess. 4/

Summary and conclusion

The documentation provided by JCI [50217_JCI] was reviewed and the same conclusions were reached that resulted in the violations cited in the ESA.

JCI's ~~fundamental~~ conclusion that "Based on this ... no such ~~[illegible]~~ scenario [ARS] existed that resulted in a release ... reach an endpoint offsite ..." ~~appears~~ is ~~flawed~~ based on an ~~incorrect~~ flawed understanding and interpretation ~~of Sc~~ 40 CFR 68.28 [ARS], 68.39 (Document) and 68.67 (PHA).

~~To better understand the correct process for the~~

~~In order to select and analyze an ARS the O/O must identify~~

~~The purpose of the ARS is to [insert 1]. The O/O must I~~ The scenarios must be "resonable and defensible [insert 2]"