From:	Adams, Sydnee
To:	Dressler, Jason; Sawyer, Bonnie
Subject:	FW: Remaining Community Stakeholder Concerns following SC OSHA Investigation - 3V Sigma USA, Georgetown, SC
Date:	Thursday, April 28, 2022 3:28:53 PM
Attachments:	3V Inspections & Citations.xlsx Revised Inspection Information and Narrative 0343-21with GNW comments.pdf

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I wanted to reach out to both of you first. Sheila is asking for these documents. It has become my understanding today that the SCOSHA inspection report attached has more information and less redactions than the one I received through a FOIA request to SCOSHA. It also has comments from the concerned citizen. Please also see the citizen's email to Denis Hall. I also learned that there is a subsequent SCOSHA report when I called them today. I have asked for the new report as well as the "less redacted" report regarding the 3/27/2021 release.
Please let me know if I can send this to Sheila. We also need to discuss our path forward.
Thanks.

From: Adams, Sydnee
Sent: Thursday, March 31, 2022 8:05 AM
To: Dressler, Jason <Dressler.Jason@epa.gov>; Sawyer, Bonnie <Sawyer.Bonnie@epa.gov>
Subject: FW: Remaining Community Stakeholder Concerns following SC OSHA Investigation - 3V Sigma USA, Georgetown, SC

From: Hall, Denise <halldh@dhec.sc.gov>
Sent: Friday, March 18, 2022 12:00 PM
To: Adams, Sydnee <Adams.Sydnee@epa.gov>
Subject: FW: Remaining Community Stakeholder Concerns following SC OSHA Investigation - 3V Sigma USA, Georgetown, SC
FYI

Denise H. Hall
Manager, Air Toxics Section
Bureau of Air Quality
Office: (803) 898-0341
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S.C. Dept. of Health & Environmental Control
Connect: www.scdhec.gov Facebook Twitter

From: 5 U.S.C. § 552 (b)(6) Personal Privacy
Sent: Friday, March 18, 2022 10:24 AM
To: Emily.farr@llr.sc.gov <Emily.farr@llr.sc.gov>
Cc: Justin Marshall <Justin.Marshall@llr.sc.gov>; Lesia.Kudelka@llr.sc.gov <Lesia.Kudelka@llr.sc.gov>; Reece, Myra <reecemc@dhec.sc.gov>; Thompson, Rhonda <thompsrb@dhec.sc.gov>
Subject: Remaining Community Stakeholder Concerns following SC OSHA Investigation - 3V Sigma USA, Georgetown, SC
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unexpected email. ***

Good morning Director Farr,

My name is 5 U.S.C. § 552 (b)(6) Personal Privacy and I am a resident of Georgetown County. I am 5 U.S.C. § 552 (b)(6) Personal Privacy and have no financial or other interest in 3V Sigma USA other than that of a citizen seriously concerned about safety of the employees at 3V Sigma and the safety of the surrounding community. This concern was exacerbated when Georgetown County Council recently approved a rezoning request for an 800-unit resort RV campground and marina ***located less than 3,000 feet downwind the 3V Sigma facility***.

I want to preface my concerns by expressing my deep appreciation for the professional responsiveness and courtesies extended to me by Justin Marshall and Lesia Kudelka of your staff. Both individuals are excellent representatives of SC LLR/OSHA and truly exemplify your goal of promoting communication and cooperation with the agency's stakeholders to ensure South Carolina is a safe place to work and live.

I will summarize my concerns about SC OSHA's most recent investigation of 3V Sigma USA and why concerned stakeholders in Georgetown County should question the results of that investigation. Detailed concerns are included in the attached documents.

By way of background, 3V Sigma is an Italian company that has one plant in the U.S. and three in Italy. The U.S. facility has a safety record that is much worse than the chemical industry average. In the last 25 years, the U.S. plant has had 22 incidents involving exposure to hazardous chemicals, 2 fatalities, 34 serious violations from SC OSHA, 1 willful violation and $123,050 in fines. We question whether any facility in South Carolina with approximately 100 employees has a worse safety record.

On May 27, 2021, 3V Sigma's Georgetown County facility experienced runaway chemical reactions in 3 pressure reactors that resulted in overexposure of 6 employees according to the 911 recording. One employee died as a result of overexposure to methylene chloride. Over 23,000 pounds of this chemical was released to the environment but the required notifications to the National Response Center and SC LEPC were not made in a timely manner as required by law. As a result, downwind residents and emergency responders were not made aware of the vapor cloud released.

SC OSHA initially inspected the facility on March 29, 2021 and issued their Citation and Notification of Penalty on September 20, 2021. The VP of Operations for 3V Sigma USA had also submitted a detailed 30-page report to SC DHEC on April 29, 2021 describing the incident. ***The report to DHEC and SC OSHA's report are not consistent in their explanations and, as a result, raise significant questions as to the root causes of the incident.***

In the letter to DHEC, executive management clearly indicates that three reactors were initiated simultaneously which is a direct violation of company procedures and places the blame for this decision on the deceased unit manager who was at home asleep on the Saturday morning when the failure initiated. ***There is no indication in the SC OSHA investigation reports that the operation of 3 reactors occurred or that this violated company procedures.***

Additionally, there are at least 7 failures of instrumentation and/or process control equipment that occurred during this incident. I have highlighted them on the Revised Inspection Information and Narrative. This many failures, at a minimum, raises the question of whether critical safety equipment

was being properly maintained. There is no indication whether SC OSHA examined historical alarm and maintenance records to make a determination.

By far, the most challenging question is why experienced operators would initiate three highly exothermic chemical reactors when they had prior knowledge that the plant's chilled water system was not operational. The SC OSHA report does not appear to explore this basic question.

SC OSHA records obtained through a FOIA request indicate that employees had appealed to the agency with detailed concerns about a history of important process and safety procedures being ignored by management. Previous inspections resulted in violations and fines exceeding $200,000 in total. This begs the question of what policy changes may have occurred at SC OSHA that this incident which included accidental chemical release, multiple procedure violations and a fatality only resulted in a fine of $2,500 or 1¼ % of the previous total.

Please review the attached documents and let me know if you share our community's concern that many essential safety questions remain unanswered following SC OSHA's investigation of this incident. Also, please let us know if you personally share our concerns that the investigation must be reopened in order to protect families with children utilizing the planned family campground located directly downwind of the 3V Sigma facility.

Thank you in advance for your personal attention to this matter of great importance to our community.

Regards,

5 U.S.C. § 552 (b)(6) Personal Privacy

[redacted]

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