UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 1
5 Post Office Square, Suite 100
Boston, MA 02109-3912

Urgent Matter - Prompt Reply Necessary
Certified Mail - Return Receipt Required

DEC 08 2014

ATTN: Rand Glucroft
Vice President of Finance
Jelliff Wire Products
354 Pequot Ave.
Southport, CT 06890

Re: Request for Information Issued Pursuant to Section 114(a)(1) of the Clean Air Act (CAA), 42 U.S.C. § 7414(a)(1)

Dear Mr. Glucroft:

On July 15, 2014, a representative from the United States Environmental Protection Agency (EPA) conducted an inspection of Jelliff Wire Products located in Southport, CT. During the inspection EPA representatives observed an ammonia tank on the premises, and further information regarding this tank and associated piping is requested.

The purpose of this inspection was, in part, to determine Jelliff Wire Products' compliance with the Emergency Planning and Community Right to Know Act's Toxic Release Inventory requirements. However the ammonia tank, the hydrogen cylinders and associated piping on site are also covered under Section 112(r)(1) of the amended Clean Air Act (CAA), 42 U.S.C. § 7412(r)(1). CAA Section 112(r)(1) mandates a federal focus on the prevention of chemical accidents. The objective of Section 112(r)(1) is to prevent accidental releases of substances that can cause serious harm to public health and the environment. Under these requirements, industry has the obligation to prevent chemical releases by (1) identifying hazards that might result in such releases, using appropriate hazard assessment techniques; (2) designing and maintaining a safe facility; and (3) minimizing the consequences of releases that do occur.

Section 114(a)(1) of the CAA, 42 U.S.C. § 7414(a)(1), gives EPA the authority to require a company to submit such information as EPA may reasonably require to determine its compliance with the CAA. To enable EPA to determine the compliance status of Jelliff Wire Products, responses to the enclosed list of questions (Attachment 2) **must be furnished within 30 days after receipt of this letter**.

Compliance with this Information Request is mandatory. Failure to respond fully and truthfully, or to adequately justify any failure to respond to this letter by November 14, 2014 can result in an enforcement action by EPA pursuant to Section 113 of the CAA, 42 U.S.C. § 7413. This statute permits EPA to seek the imposition of penalties. This reporting requirement is not subject to Office of Management and Budget review under the Paperwork Reduction Act. Please be further advised that provision of false, fictitious, or fraudulent statements or representations may subject you to criminal penalties.

You may, if you desire, assert a business confidentiality claim covering part or all of the information requested, in the manner described by 40 C.F.R. § 2.203(b). You should read the above-cited regulations carefully before asserting a business confidentiality claim, since certain categories of information are not properly the subject of such a claim. If no such claim accompanies the information when it is received by EPA, the information may be made available to the public by EPA without further notice to you.

You are required to submit the above-referenced information to:

Chris Rascher, RCRA, EPCRA and Federal Programs Unit
Office of Environmental Stewardship (Mail Code OES 05-1)
U. S. Environmental Protection Agency, Region I
5 Post Office Square, Suite 100
Boston, Massachusetts 02109-3912

As part of your response, please complete the enclosed declaration (Attachment 1) and provide a cover letter carefully specifying what documentation is included to answer each question. If you have any questions with regard to this Information Request, please contact Mr. Chris Rascher of my staff at (617) 918-1834.

Sincerely,

Susan Studlien

Susan Studlien, Director
Office of Environmental Stewardship

Enclosures

cc: Chris Rascher, EPA

ATTACHMENT 1

Instructions: Complete and Include With Your Response

DECLARATION

I declare under penalty of perjury that I am the

_____ of _____,
[Title] **[Name of Facility]**

that I am authorized to respond on behalf of

_____, and
[Name of Facility]

that the foregoing is a complete, true, and correct response.

Executed on _____ _____
[Date] **[Signature]**

_____
[Type Name and Title]

ATTACHMENT 2

Guidance on How to Respond. You must submit all responsive documents. Please respond separately to each of the questions, referencing each question by number in your answer. The response must include copies of all records and information which you reference in your response or which you feel are relevant to the information being requested. "Records" and "information" and "document" means the original or an identical and readable copy thereof, and all non-identical copies (whether different from the original by reason of notation made on such copies or otherwise), of any writings or records **(including electronic records)** of any type or description, however created, produced or reproduced.

As part of your response, please complete the enclosed declaration (Attachment 1) and provide a cover letter carefully specifying what documentation is included to answer each question. (If documents requested in response to one item duplicate those requested by another question, submit only one copy of the documentation.) Your submission must be a self-explanatory, complete response that is dated and signed by an authorized facility official.

Continuing Obligation to Provide/Correct Information. If additional information or documents responsive to these questions become known or available after answering this request, including, but not limited to, specific information that may be deemed *unknown* at the time of your response, EPA hereby requests, pursuant to Section 114(a)(1) of the CAA, 42 U.S.C. § 7414(a)(1), that you supplement your response to EPA within ten (10) days of discovering such information. If at any time after the submission of this response, you discover or believe that any portion of the submitted information is incomplete or misrepresents the truth, notify Chris Rascher of this fact as soon as possible and provide EPA with a corrected response. **For the period from January 1, 2009**, to the present, provide a separate numbered response to each numbered paragraph or subparagraph below. **To the extent that you believe that you have answered a question in another section, please refer to the section and answer you have provided.**

Questions

1. Provide all documents and communications between Jelliff Wire Products and Tanner regarding maintenance agreements, tank rental agreements, ammonia purchases and ammonia delivery agreements.

2. Provide any and all current site plans, facility diagrams and diagrams including piping and instrumentation of the ammonia system, including but not limited to the ammonia tank, the ammonia dissociator, ammonia detectors, relief valves and all the related piping. Include all hydrogen piping, gages, valves, etc.

3. Provide records and receipts for any maintenance performed by Jelliff Wire Products, Tanner or any other entity on the ammonia tank, its piping, the ammonia dissociator, and all hydrogen piping gauges and valves.

4. State the date(s) the ammonia tank, piping and ammonia dissociator were installed. Provide the name, make and model number for such equipment and any other information Jelliff Wire Products has in its possession about this equipment. Include the name and address of the company or other entity that installed this equipment.

5. Please describe the method and frequency that Jelliff Wire Products or other qualified individuals, such as consultants or contractors, visually inspect the ammonia system including the ammonia tank, dissociator, and piping. Describe the frequency and method of inspecting all piping, valves, pipe joints, tanks and tank fittings. State the frequency the entire ammonia system is examined for signs of corrosion, damage, wear and leaks. Provide records of these inspections and their findings.

6. For the period the ammonia tank has been present at the facility, state whether there were any ammonia releases from the facility. Describe each instance and include the date, quantity, description of cause and any corrective action or repairs made because of these releases. Likewise, indicate whether there have been any releases/incidents involving hydrogen.

7. Describe the methods and frequency of valve and valve stem maintenance.

8. List all safety and pressure relief valves in the ammonia system, and provide the expiration date on each of the valves listed in this question. State the date these valves were last replaced.

9. Hose connections must have protective caps. They provide a "secondary" closure and will sustain tank pressure as well as keeping out rain, snow, etc. Do all hose connections have these caps? List all connections that do not.

10. If present, state the color of the liquid fill valve and the vapor return valve.

11. State the temperature, pressure and volume of ammonia in the ammonia tank. Also provide the Material Safety Data Sheets/ Safety Data Sheets for ammonia.

12. Provide a copy of the bill of lading, other shipping papers, and all receipts for the ammonia shipments received and charged into the refrigeration systems since January 1, 2009.

13. Provide the name, title and telephone number for employees at the facility who have hazardous material management and/or emergency response responsibilities.

14. Identify any specific building and operation design codes and standards used to build and operate the facility's ammonia system. Identify any specific building and operation design codes and standards used to modify or make changes to the facility's ammonia system. Include the date(s) these changes were made. State where (and if) records of compliance with these codes and standards are stored and maintained.

15. Provide a copy of any process hazard analyses, reviews, or assessments for the ammonia system and the hydrogen system (collectively "(PHAs"), documentation of team members who participated in the PHAs (including their resumes identifying their area of expertise), and records that document the response to the team's findings and recommendations. Your response should include but not be limited to any hazard reviews conducted by insurance companies.

16. Provide all records and logs that document inspections, calibrations, bump tests and maintenance activities of the following components performed since January 1, 2009: (a) all fixed ammonia detectors; and (b) all portable and hand held ammonia and hydrogen detectors. Include a copy of all applicable standard operating procedures used for each of these activities as well as a copy of the applicable manufacturers' manuals. Include all alarm set points associated with each fixed ammonia detector and identify where (i.e., local and/or remote, visual and/or audible) the alarms are discernible. Be specific for each detector alarm.

    For the activities outlined above, provide a list of all persons who performed the listed activities (i.e., inspection, maintenance, and calibration), the operator's affiliation (i.e., Jelliff Wire Products employee, specific contractor employee) and a copy of initial and refresher training provided for each of the job functions he or she performed.

17. Describe all activities since the July 15, 2014 EPA inspection regarding ammonia pipe labeling, ammonia tank labeling, fencing and other protections from potential unauthorized activity, ammonia and hydrogen pipe labeling inside of the building, protection of piping and tanks from vehicular traffic, and any additional protection of ammonia and hydrogen systems. Also provide the cost breakdown for conducting these activities.

18. Since January 1, 2009 describe all communications and coordination with the local fire department and any emergency response personnel regarding responses to actual or potential releases of ammonia or hydrogen. Provide the name and dates that these communications occurred. Also provide a copy of the Facility's emergency action plan, emergency response plan or any other document used to prepare and respond to emergencies.