

## Communication from Public

**Name:** Makiko Okuma

**Date Submitted:** 03/09/2026 02:15 PM

**Council File No:** 25-1469

**Comments for Public Posting:** Dear Members of the Public Safety Committee, I am writing to express my deep concern about the ongoing practice of the use of chemical hazardous solvents like trichloroethylene and perchloroethylene in the soil and groundwater within our community. This action poses a significant risk to public health, safety, and the environment. There is growing evidence that exposure to this chemical can lead to respiratory issues, neurological effects, and other long-term health complications. I urge the committee to halt any further distribution of this chemical and to conduct a thorough investigation into its impacts. Please prioritize the health and safety of all residents by considering alternative methods of addressing the issue at hand. Thank you for your attention to this urgent matter. Sincerely, Makiko Okuma

## Communication from Public

**Name:** Cynthia Babich

**Date Submitted:** 03/09/2026 06:38 PM

**Council File No:** 25-1469

**Comments for Public Posting:** I have been the director of the Del Amo Action Committee for 30 years. We were formed to address impacts on our health due to the proximity of three Superfund sites (Montrose Chemical, Del Amo Waste Pits and Jones Chemical) and several legacy landfills closed or abandoned prior to stronger title 22 closure regulations (Royal Blvd., Alpine Village, Gardena Landfills #1, #2, #4 & #5). As we worked with agencies to remediate the Montrose and Del Amo sites, the warehouses increased along with truck traffic along Torrance Blvd. going right through our community. Jones Chemical tankers use this route to reach the only way in and out of the facility by using Torrance Blvd. to get to Denker Ave. The residents surrounding this facility are expected to live in fear and under the threat of their bodily harm from a chlorine gas cloud. As the Activity Log and Inspection Reports are reviewed by this committee, you will see that there have been many near misses and derailments and near derailments. Releases that can not be quantified by the owners have occurred, one last month. A facility falling apart at the seams. Inspection after inspection documents the facilities mismanagement and sloppy procedures. The best argument Jones can come up with is that they provide a service, critical to clean living and safety. The residents adjacent to this facility do not enjoy clean living and safety. Our area has been designated for chemicals and toxic waste long ago from racist redlining practices. The time has come to rectify this incompatibility. Relocate the people or the facility. This situation was created by leaders having the lack of will to make the needed changes to protect those who elected them to serve and protect. We are not being unreasonable. We have done the research and educated ourselves based on the meetings we've attended with first responders who told us if a catastrophic event occurred involving chlorine gas, we (the community) would be instructed to shelter in place. Sounds simple, except for the facts that: • a majority of the community do not know this term • depending on which side of Normandie they live on they may or may not get the alert • they have not been provided the proper tools to seal themselves into a room until the shelter in place is lifted • there remains confusion on first responder response based on the city and county bordering each other at this location and a Torrance PO even though not apart of Torrance. On the facility side the danger

begins with the facility deciding if and when they need a response; by calling 911. A full rail-car release under pressure could occur as quickly as in 6 minutes. Every wasted second matters. The facility has failed recently to file proper Cal OES paperwork needed for reporting to agencies of a problem or release. Inspections have documented Chlorine monitoring equipment has been in malfunction status or bypassed during inspections. This facility has had storm water drainage areas collapse onto itself and tankers punch through the asphalt when disconnect from the truck; it is literally falling apart because it is so old and due to lack of maintenance. Business as usual is the mantra of Jones Chemical who boast about their safety awards from the Chlorine Institute, of which they are sitting board members. They grade their own report card with our lives in the balance. We give them a F. We need bold action from the City Council and this Safety Committee. Please do the right thing and protect the residents, not the easy thing of ignoring the problem because the fix requires real work and policy change. This is long overdue. We are not willing to die for this facility's good for the many mentalities; we are the few – the few hundred living in fear and trapped in racism grasp for decades. The attached inspection report is just one of many documenting the violations: of special note is Photographs 19, 19a, 20, 21 and 22 to highlight a couple. In support of this report, our group has included the following attachments for review: Inspection Reports: Two recent facility inspection reports that document safety concerns and violations at Jones Chemicals Inc. A letter from Congresswoman [Name], highlighting community concerns and the need for immediate action regarding the facility's risks to public health and safety. Community Emergency Response Plan (CERP): A comprehensive plan developed by Del Amo Action Committee to equip the surrounding communities with emergency preparedness resources; created in the absence of an official, comprehensive emergency response plan from the facility or local authorities. Agency Activity Log: Details the history of regulatory fines and enforcement actions at Jones Chemicals Inc., providing a succinct record of the facility's non-compliance with safety and environmental standards. Spill Reports from the near-spill event in January as well as the confirmed release in February.

**US EPA Region 9 Enforcement and Compliance Assurance Division  
 Clean Air Act Section 112(r)  
 Inspection Report**

|   |  |  |
|---|--|--|
| <b>Inspection Date(s):</b>  | May 31, 2024   | <b>Inspection Announced:</b> Yes   |
| <b>Time:</b>  | <b>Entry:</b> 8:30 a.m. (PDT)                                | <b>Exit:</b> 4:15 p.m. (PDT)   |
| <b>Media:</b>   | Air  |  |
| <b>Regulatory Program(s)</b>  | Risk Management Plan (RMP) 112r                              |  |
| <b>Company Name:</b> JCI Jones Chemicals, Inc.                              |  |  |
| <b>Facility or Site Name:</b> JCI Jones Chemicals, Inc. – Torrance          |  |  |
| <b>Facility/Site Physical Location:</b> 1401 W. Del Amo Blvd.               |  |  |
| <b>(city, state, zip code)</b> Torrance, CA 90501-1630                      |  |  |
| <b>Geographic Coordinates:</b> 33.847534, -118.301613                       |  |  |
| <b>Mailing address:</b> 1401 W. Del Amo Blvd.                               |  |  |
| <b>(city, state, zip code)</b> Torrance, CA 90501-1630                      |  |  |
| <b>County:</b> Los Angeles  |  |  |
| <b>Facility/Site Contact:</b> Tim Ross, West Coast VP and Branch Manager    |  |  |
| <a href="mailto:tross@jcichem.com">tross@jcichem.com</a>                    |  |  |
| 310-523-1629  |  |  |
| <b>Facility/Site Identifier:</b> 1000 0014 1394                             |  |  |
| <b>Facility DUNS Number:</b> 2216091  |  |  |
| <b>NAICS:</b> 42469 Other Chemical and Allied Products Merchant Wholesalers |  |  |
| <b>Facility/Site Personnel Participating in Inspection:</b>                 |  |  |
| <b>Name</b>   | <b>Title</b>   | <b>Email</b>   |
| Tim Ross  | Vice President   | <a href="mailto:tross@jcichem.com">tross@jcichem.com</a>   |
| Tim Gaffney   | Executive Vice President                                     | <a href="mailto:tgaffney@jcichem.com">tgaffney@jcichem.com</a>   |
| David Huerta  | Branch Manager   | <a href="mailto:dhuerta@jcichem.com">dhuerta@jcichem.com</a>   |
| <b>Additional Persons Participating in Inspection:</b>                      |  |  |
| Alvin Dong  | Los Angeles City Fire Department (LAFD), CUPA RMPPS          | <a href="mailto:alvin.dong@lacity.org">alvin.dong@lacity.org</a>                                       |
| Diana Nguyen  | LAFD, Industrial Hygienist                                   | <a href="mailto:diana.t.nguyen@lacity.org">diana.t.nguyen@lacity.org</a>                               |
| Domenick Booker   | LA County Fire Department, Hazardous Materials Specialist II | <a href="mailto:domenick.booker-pomata@fire.lacounty.gov">domenick.booker-pomata@fire.lacounty.gov</a> |
| David Britt   | USEPA, Superfund Remedial Project Manager                    | <a href="mailto:britt.david@epa.gov">britt.david@epa.gov</a>   |

| <b>Inspector(s):</b>      |                         |  |
|---------------------------|-------------------------|--|
|                           | <b>Signature:</b>       | <b>Date:</b>   |
| Kathryn Kwiecinski        |                         |  |
|                           | USEPA<br>Lead Inspector | <a href="mailto:kwiecinski.kathryn@epa.gov">kwiecinski.kathryn@epa.gov</a><br>213-244-1848 |
| Cyntia Steiner            | USEPA<br>Inspector      | <a href="mailto:steiner.cyntia@epa.gov">steiner.cyntia@epa.gov</a><br>415-947-4112         |
| Sergio Mora               | USEPA<br>Inspector      | <a href="mailto:mora.sergio@epa.gov">mora.sergio@epa.gov</a><br>415-972-3463               |
| Kiya Opstrup              | USEPA<br>Inspector      | <a href="mailto:opstrup.kiya@epa.gov">opstrup.kiya@epa.gov</a><br>415-972-3482             |
| <b>Supervisor Review:</b> |                         |  |
|                           | <b>Signature:</b>       | <b>Date:</b>   |
| Rick Sakow                |                         |  |
|                           | USEPA<br>Manager        | <a href="mailto:rick.sakow@epa.gov">rick.sakow@epa.gov</a><br>(415) 972-3495               |

**SECTION I – INTRODUCTION**

**Purpose of the Inspection**

The purpose and scope of United States Environmental Protection Agency (USEPA) inspection was to evaluate JCI Jones Chemicals, Inc. (“Facility”) implementation of and compliance with the requirements under CAA § 112(r) Risk Management Program. The inspection focused on the Facility’s compliance with the Consent Agreement and Final Order (CAFO) which was filed on August 31, 2021 (Docket Number CAA(112r)-09-2021-0067). The inspection was announced to Facility representatives on May 16, 2024 via an email from Kathryn Kwiecinski, USEPA Region 9. The email to the Facility encouraged employee representatives to participate in all meetings, interviews, and discussions. This report documents the USEPA inspection. Representatives of the local California Certified Unified Program Agency (CUPA), Alvin Dong and Diana Nguyen of the Los Angeles City Fire Department’s Fire Prevention and Public Safety Bureau, and a representative of the county fire department, Domenick Booker of the Los Angeles County Fire Department also attended the inspection.

**Opening Conference**

The USEPA inspection team, consisting of EPA inspectors Kathryn Kwiecinski, Cyntia Steiner, Sergio Mora, and Kiya Opstrup, arrived at the Facility at 8:30 a.m. on May 31, 2024 for an announced inspection. The opening conference included the inspection team and Facility representatives (see Attachment 1). USEPA inspectors presented credentials to Facility representatives. USEPA inspectors explained that the inspection included both a Facility walk-

through and records review. Facility personnel were presented with, and signed, the Notice of Inspection and the Notice of Right to Claim Confidentiality (“CBI”) (see Attachment 1).

### **Facility/Process Description**

The JCI Jones Chemicals, Inc. facility supplies chemicals including chlorine and sodium hypochlorite to customers for disinfection of bulk water systems. The Facility receives bulk quantities of chlorine and sulfur dioxide via railcar and either repackages into smaller containers or processes the chemicals to form sodium hypochlorite (bleach). The products are shipped by truck to customers. The Facility indicated that it is a non-responding facility but staff are trained to respond to a release and don emergency response personal protective equipment (i.e., a modified Level B HAZMAT gear with self-contained breathing apparatus).

The Facility employs 27 employees and is located in Torrance, California in Los Angeles County. The latest Facility Risk Management Plan (RMP) 5-year update was submitted November 19, 2021, and the next submission is due November 19, 2026. The RMP regulated substances for the Facility are chlorine and anhydrous sodium dioxide. According to the Facility’s 2021 RMP submission, chlorine has a reported quantity of 1,916,000 pounds and sulfur dioxide has a reported quantity of 188,600 pounds.

### **Prior Enforcement History**

- The Facility entered a Consent Agreement and Final Order (“CAFO”) with USEPA effective August 31, 2021 following inspections in 2015 and 2017. See Section II.B – Document Review for further discussion of CAFO compliance tasks.
- There are no California Accidental Release Prevention Program (CalARP) violations or enforcement actions documented in California Environmental Reporting System (CERS) in the last 5 years.
- There are no enforcement actions documented in the Occupational Safety and Health Administration’s Establishment Search Database in the last 5 years.<sup>1</sup>

## **SECTION II – OBSERVATIONS**

The following observations were made by the inspection team based on the field observations and review of the documentation.

### **II.A Field Observations**

The USEPA inspection team completed a physical inspection of the Facility at approximately 9:45 a.m. The purpose of the physical inspection was to provide the USEPA contract inspection team with an “on the ground” orientation. 32 photographs of the Facility were taken during the inspection, which are documented in Attachment 2. After the inspection, Facility

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<sup>1</sup> <https://www.osha.gov/pls/imis/establishment.html>

Representative Tim Gaffney provided 14 photographs as the Facility completed projects to address areas of concern identified during the inspection, which are also documented in Attachment 2.

## **II.B - PROGRAM-SPECIFIC OBSERVATIONS – DOCUMENTATION REVIEW**

The USEPA inspection team evaluated the completion of compliance tasks set forth in the EPA's August 31, 2021 CAFO, described further below.

- *Compliance Task #1:* The inspection team observed a demonstration of LIMBLE, the Facility's Computerized Maintenance Management System (CMMS). The purpose of a CMMS is to ensure follow-through on both regularly scheduled maintenance tasks and unplanned work orders. During the demonstration, the inspection team noticed an unplanned work order related to the bleach systems gasket due that day and requested further documentation of how the order originated. At the time of inspection, a work order had not yet been produced for a chlorine sensor malfunction discovered the previous day. The Facility later provided documentation that the unplanned bleach system gasket work order arose from a monthly bleach system maintenance checklist completed April 9, 2024.
- *Compliance Task #2:* USEPA previously reviewed the Facility's updated Mechanical Integrity Manual including updates to Pipe Testing Protocol and Ultrasonic Thickness Testing (UTT). During the inspection, the inspection team noticed markings on pipes to indicate corrosion monitoring locations for UTT. The Facility reported that they have replaced sections of piping due to the results of UTT, which was performed three years in a row in order to establish corrosion rates. After the inspection, the Facility provided the latest Ultrasonic Testing results from December 2022 and the Facility reported that they plan to do Ultrasonic Testing again in 2024.
- *Compliance Task #3:* USEPA previously confirmed that the Facility developed operating procedures, safe work practices, and trainings for operators in Spanish so that operating procedures are understood. The inspection team asked if any current operators have received the Spanish training and were informed by the Facility that only the English version is being used since they no longer employ operators whose primary language is Spanish.
- *Compliance Task #4:* USEPA previously reviewed the Facility's formal document control procedure. Representatives from the Facility stated that they found these procedures helpful. The purpose of document control procedures is to ensure that important documents such as standard operating procedures are posted and distributed in their most current versions. Notably, the Railcar Connection and Disconnection Procedures posted on the Chlorine Railcar Platform did not have a revision date and did not match the current procedures in the office.

- *Compliance Task #5:* USEPA previously reviewed the Facility’s tabletop emergency response exercise and emergency response field exercise. The Facility reports annual coordination with first responders and continues to coordinate with LAFD on their Emergency Action Plan.

### SECTION III – AREAS OF CONCERN (AOC)

The presentation of areas of concern identified during the field observations and document review does not constitute a formal compliance determination or violation.

#### III.A – Risk Management Program – Clean Air Act Section 112(r) (7)

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| <b>Area of Concern #1</b>  |
| <b>Observation Summary:</b> One-ton chlorine and sulfur dioxide containers were unchocked or improperly chocked and stored closely together such that the ends are not accessible.   |
| <b>Citation:</b><br><b>40 CFR 68.65 Process Safety Information.</b><br><i>(d)(2) The owner or operator shall document that equipment complies with recognized and generally accepted good engineering practices.</i>   |
| <b>Supporting Information:</b><br>Photographs 2-9  |
| <b>Description of Observation:</b><br>Section 2.6.7 of Chlorine Institute (CI) Pamphlet 17 (“Packaging Plant Safety and Operational Guideline”), Edition 5 states, “Ton containers, which weigh between 1,300 lb. (590 kg) and 1,650 lb. (750 kg) when empty, are always stored in the horizontal position, above the ground or floor, on steel, concrete or other suitable supports. Individual ton containers or the ton containers at each end of a row of ton containers should be chocked to prevent rolling. Ton containers should be stored with each end accessible so an Emergency Kit B can be applied if necessary.”<br><br>In the warehouse, inspectors observed full, one-ton chlorine containers and full, one-ton sulfur dioxide containers chocked by pieces of wood even though proper chocks were located nearby. Inspectors observed one full, one-ton sulfur dioxide container located behind crated cylinders, unchocked. Full chlorine containers appear to be stored too close to the wall of the warehouse and too close to another row of containers for each end of each container to be accessible so an Emergency Kit B can be applied if necessary.<br><br>Near the Fill Stations, inspectors observed a row of one-ton sulfur dioxide containers, unchocked.<br><br>The Facility discarded all pieces of miscellaneous wood in the warehouse and have posted laminated signs in the warehouse and plant yard where containers are stored stating, “All Tons Must Be Chocked.” This project was completed as of June 17, 2024 and is documented in Photographs 33-35. |

The inspection team has not received documentation showing that one-ton containers are stored in a manner that each end is accessible so an Emergency Kit B can be applied if necessary.

**Area of Concern #2**

**Observation Summary:** Process piping from the Chlorine Railcar Platform is unlabeled and unsupported.

**Citation:**

**40 CFR 68.65 Process Safety Information.**

*(d)(2) The owner or operator shall document that equipment complies with recognized and generally accepted good engineering practices.*

**Supporting Information:**

Photograph 11, 23-28, 30-32

**Description of Observation:**

1. Section K314.1 of ASME B31.3 (2020) states for piping with threaded joints, "... (b) Supports shall be designed to control or minimize strain and vibration on threaded joints and seals."
  - Inspectors observed unlabeled chlorine piping shaking while walking up the stairs of the Chlorine Railcar Platform (Photograph 11).
  - Inspectors observed liquid chlorine piping leading to the bleach plant appeared to be unsupported (Photographs 23-25, 30-32).
  - Inspectors observed a caustic soda pipe floating off its support (Photograph 26) and missing a pipe strap (Photograph 27). The pipe strap appeared to have fallen off and was on the ground below the pipe (Photograph 28).

The Facility contracted a seismic engineer to conduct a structural inspection on June 19, 2024. The results of the inspection indicated two locations where additional supports were recommended. The Facility completed corrective actions by installing additional supports and bracings on two of the three areas by EPA's inspection. This project was completed July 15, 2024 and is documented in Photographs 42-46.

2. Section 3.1 of ASME A13.1 (2015) states that, "Positive identification of the contents of a piping system shall be by lettered legend, giving the name of the contents in full or abbreviated form."
  - Inspectors observed unlabeled, grey chlorine piping leading from the railcar platform (Photograph 11).

The inspection team has not received documentation showing that supports for the caustic soda pipe have been repaired and liquid chlorine piping from the railcar platform has been labeled.

| <b>Area of Concern #3</b>   |
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| <b>Observation Summary:</b> Railcar Connection and Disconnection Procedures posted on the Chlorine Railcar Platform do not match the latest versions of the operating procedures in the office.   |
| <b>Citation:</b><br><b>40 CFR 68.69 Operating Procedures.</b><br><i>(a) The owner or operator shall develop and implement written operating procedures that provide clear instructions for safely conducting activities involved in each covered process consistent with the process safety information</i><br><i>(c) The operating procedures shall be reviewed as often as necessary to assure that they reflect current operating practice, including changes that result from changes in process chemicals, technology, and equipment, and changes to stationary sources. The owner or operator shall certify annually that these operating procedures are current and accurate.</i>  |
| <b>Supporting Information:</b><br>Photograph 10<br>"Production Manual - PR VI 20 - 28 - SOP for Compressed Gas Railcar Connection Disconnection and Release - 2 October 18.pdf"<br>"Production Manual - PR VI 20 - 28 - SOP for Compressed Gas Railcar Connection, Disconnection, and Release - 24 June 2024.docx"<br>"Railcar Connection Checklist.docx"<br>"Railcar Disconnection Checklist.docx"<br>"Railcar Valve Closure System Checklist.docx"  |
| <b>Description of Observation:</b><br>Inspectors observed laminated Railcar Connection and Disconnection Procedures attached to railing on the Chlorine Railcar Platform (Photograph 10). Procedures are undated and differ from the 2018 version of the Production Manual SOP for Compressed Gas Railcar Disconnection and Release provided by the Facility, available at the time of inspection. Written operating procedures for safely conducting railcar connection and disconnection are not clear if the steps provided to the operator are different from the most up-to-date procedures.<br><br>The Facility revised the Railcar Connection and Disconnection SOP in the Production Manual and checklists posted on the Railcar Platforms to be consistent. Checklists now have a revision date at the bottom for document control. This project was completed June 24, 2024 and is documented in Photograph 41. Since the SOP in the Production Manual needed to be updated after it was found to be inconsistent with the checklist, the Facility did not review the operating procedures as often as necessary to assure that they reflected current operating practices. |

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| <b>Area of Concern #4</b>   |
| <b>Observation Summary:</b> Process equipment including hand valves, bolts, plates, and piping are corroded.  |
| <b>Citation:</b><br><b>40 CFR 68.73 Mechanical integrity.</b><br><i>(e) Equipment deficiencies. The owner or operator shall correct deficiencies in equipment that are outside acceptable limits (defined by the process safety information in § 68.65) before further use or in a safe and timely manner when necessary means are taken to assure safe operation.</i>  |
| <b>Supporting Information:</b><br>Photographs 17 -19, 26, 29  |
| <b>Description of Observation:</b><br>Several hand valves were observed to be corroded: <ol style="list-style-type: none"><li>1. The compression plate on the liquid chlorine fill valve in Chlorine Filling Station 2 is severely corroded and is disintegrated and the valve body is pitted. (Photographs 18-19).</li><li>2. The manual liquid chlorine fill valve body in Chlorine Filling Station 1 showed signs of surface and pitting corrosion (Photograph 17).</li></ol> <p>Facility staff indicated that the filling station valves are checked regularly for leaks and tracked in the LIMBLE CMMS. However, valves should not be in operation until they fail (e.g., valve leaks). Valves should be replaced or rebuilt on a regular basis.</p> <p>Corrosion was also observed as follows:</p> <ol style="list-style-type: none"><li>3. Bolts and plates of the top of the bleach plant reactor (Photograph 29).</li><li>4. Corrosion on the bottom of the caustic soda piping (Photograph 26).</li></ol> |

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| <b>Area of Concern #5</b>  |
| <b>Observation Summary:</b> The chlorine sensor in the production fill area (CL2-L2) was not operational at the time of the inspection.  |
| <b>Citation:</b><br><b>40 CFR 68.73 Mechanical integrity.</b><br><i>(e) Equipment deficiencies. The owner or operator shall correct deficiencies in equipment that are outside acceptable limits (defined by the process safety information in § 68.65) before further use or in a safe and timely manner when necessary means are taken to assure safe operation.</i> |
| <b>Supporting Information:</b><br>Field Observations<br>Photographs 20-22<br>"Torrance – Chlorine Sensor #CL2-L2.pdf"  |

**Description of Observation:**

Inspectors observed that Chlorine Monitor #2 for the “CL2 Ton – PRODUCTION Fill Area” read of “XX.X” with a warning flag reading “SYSTEM FAULT”.

Facility Staff said during the inspection that operators discovered that Chlorine Monitor #2 was bleeding liquid solution the previous day. The Facility later provided the Weekly Inspection Checklist for the week of 5/27/24 showing that the issue with Chlorine Sensor #CL2-L2 was discovered on May 30, 2024. During the document review portion, Facility Staff indicated that maintenance had not yet uploaded this error to LIMBLE and that the monitor was last calibrated April 2024.

The inspection team has not received documentation of when the issue was uploaded to LIMBLE, what maintenance was performed, when the monitor was returned to service, or what means were taken to assure safe operation while the monitor was out of service.

**Area of Concern #6**

**Observation Summary:** The Facility’s Emergency Action Plan contains contradictory information and elements inappropriate for a non-responding facility.

**Citation:**

**40 CFR 68.90(b) Non-responding stationary source.** The owner or operator of a stationary source whose employees will not respond to accidental releases of regulated substances need not comply with § 68.95 of this part provided that:

*(3) Appropriate mechanisms are in place to notify emergency responders when there is a need for a response, including providing timely data and information detailing the current understanding and best estimates of the nature of the accidental release.*

**Supporting Information:**

“CONTINGENCY Plan FINAL Torrance 5-21-24.docx”

“JCI Torrance – Emergency Action Plan.docx”

**Description of Observation:**

The Facility has been working with LAFD on their Emergency Action Plan (EAP). An EAP is required for a non-responding facilities per **40 CFR 68.90(b)**. Non-responding facilities need not comply with the same requirements as responding facilities described in 40 CFR 68.95, yet the Contingency Plan (or EAP) provided by the Facility contained language implying that Facility personnel may respond to emergencies independently without calling emergency response agencies. For example:

1. According to the Facility’s Contingency Plan dated May 21, 2024, “JCI response teams are set up to work independently or in conjunction with off-site response agencies depending on the size of the incident and the specific manpower capabilities available. JCI’s response teams are not commercial hazmat teams or clean up companies and will only respond to incidents specific to the chemicals carried at our facilities” (CP I-14).

2. The Contingency Plan states, “The Emergency Coordinator will quickly assess the situation to determine if the issue can be resolved by the facility’s Emergency Response Team or whether a Branch evacuation and or additional assistance is needed” (CP I-16).
3. On page CP I-25, the Facility distinguishes between “small incidents” and “large incidents” and only references calling 911 for large incidents. There is no definition of small or large incident but implies that a small incident could be an accidental release over the reportable quantity which would trigger notification to the National Response Center. Since the plan lists calling 911 as a specific action only for large incidents, a release may occur over the reportable quantity and the incident would be reported only to the National Response Center and not to local emergency responders.
4. The Contingency Plan also did not clearly list the Emergency Coordinator. The Contingency Plan lists Branch Manager David Huerta as the Emergency Coordinator on Page CP I-3, but this contradicts with page CP I-15 where the plan lists West Coast Vice President Tim Ross as the Emergency Coordinator. Contradictory information may lead to confusion in the event of an incident.

If Facility employees will respond to an accidental release, then the Facility must also demonstrate compliance with the requirements listed in 40 CFR 68.95 for responding facilities which includes documentation of first-aid and emergency medical treatment training; procedures for emergency response; and procedures for the use of emergency response equipment and for its inspection, testing, and maintenance.

The inspection team recommended further coordination with LAFD to eliminate sources of confusion.

The Facility has re-stated that they are a non-responding facility and revised their EAP as of July 1, 2024 and continues to coordinate with LAFD to ensure their plan clearly communicates their procedures in the event of an emergency. The revised Emergency Action Plan still contains elements inappropriate for a non-responding facility. The Facility may wish to consult OSHA’s Evacuation Plans and Procedures eTool for assistance constructing their EAP<sup>2</sup>.

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<sup>2</sup> <https://www.osha.gov/etools/evacuation-plans-procedures/expert-systems/create-eap>

**III.B – General Duty Clause – Clean Air Act Section 112(r)(1)**

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| <b>Area of Concern #7</b>   |
| <b>Observation Summary:</b> The Facility's structure above the production area has deteriorated and appears to be inadequately maintained. The railcar platforms and stairs were corroded and unsafe.   |
| <b>Citation:</b><br><b>Clean Air Action Section 112 - Maintain a Safe Facility</b><br><b>(r) Prevention of Accidental Releases (1) Purpose and General Duty</b> - It shall be the objective of the regulations and programs authorized under this subsection to prevent the accidental release and to minimize the consequences of any such release of any substance listed pursuant to paragraph (3) or any other extremely hazardous substance. The owners and operators of stationary sources producing, processing, handling or storing such substances have a general duty ... to maintain a safe facility taking such steps as are necessary to prevent releases ...  |
| <b>Supporting Information:</b><br>Field observations<br>Photographs 11-15   |
| <b>Description of Observation:</b><br>Corroded beams and a deteriorated roof were observed on the production area canopy. The overhead structure is also used to support chlorine and sulfur dioxide piping from the railcars and to production areas. The support beam for the two-ton hoist for the ton containers was observed to be corroded. EPA also observed that the stairs leading to one of the railcar platforms was corroded and unsafe (Photographs 12-15). The support railing for the same platform was also observed to be corroded, with peeling paint and pitting (Photograph 11).<br><br>Facility representative Tim Ross stated that he is in the process of obtaining building permits to build a new structure/production area, which will be built adjacent to the current production area. It is being done this way to avoid production interruptions. The Facility is actively pursuing a building permit process.<br><br>In the meantime, inspectors were told that the Facility experienced a wind event, and the existing roof structure was damaged, and it appears that it was repaired by placing unsecured roof panels on top of the structure. A loose roof panel that falls on process equipment or piping could cause a catastrophic release. During the closing conference, Tim Gaffney indicated that the Facility would evaluate the structure by hiring a third-party inspector to review the EPA concerns. While a new structure/production area is being planned, the Facility needs to maintain a safe facility taking such steps as are necessary to prevent releases.<br><br>The Facility contracted a seismic engineer to conduct a structural inspection on June 19, 2024. The results of the inspection indicated that the overhead crane rails and connections and supporting columns were structurally sound. |

The Facility installed new stairs to the Railcar Platforms and provided photographs on June 24, 2024. Photographs 36-40 show the completion of the new stairs.

The inspection team has not received documentation indicating that the roof panel repairs completed after the wind event are adequate.

## **SECTION V – LIST OF APPENDICES**

- Attachment 1: Inspection Participation Sign-in Sheet, Signed Notice of Inspection, Signed Receipt of Notice of Right to Claim Confidentiality, & Documents Review/Documents Requested
- Attachment 2: Photograph Log and Photographs

**Attachment 1:**  
**Inspection Participation Sign-in Sheet, Signed Notice of Inspection, Signed Receipt of Notice  
of Right to Claim Confidentiality & Documents Review/Request List**



**Sign-In Sheet**  
**U.S. ENVIRONMENTAL PROTECTION AGENCY**  
**Region IX**  
Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) §103;  
Emergency Planning and Community Right-to-Know Act (EPCRA) §§302-312; and  
Clean Air Act §112r Risk Management Program (CAA RMP)

DATE/TIME: 5/31/2024

INSPECTOR (NAME, ADDRESS, PHONE):

US EPA Region 9 (ENF-2-2)  
Kate Kwiecinski  
75 Hawthorne St.  
San Francisco, CA 94105  
(213) 244-1848

FACILITY NAME: JCI Jones Chemicals Inc.

FACILITY ADDRESS:  
1401 W. Del Amo Blvd.  
Torrance, CA 90501

| Name | Agency/Company | Position | Email |
|------|----------------|----------|-------|
|------|----------------|----------|-------|

|                 |          |           |                            |
|-----------------|----------|-----------|----------------------------|
| Kate Kwiecinski | U.S. EPA | Inspector | kwiecinski.kathryn@epa.gov |
|-----------------|----------|-----------|----------------------------|

|                 |          |   |                         |
|-----------------|----------|---|-------------------------|
| Cynthia Steiner | U.S. EPA | " | steiner.cynthia@epa.gov |
|-----------------|----------|---|-------------------------|

|              |          |   |                      |
|--------------|----------|---|----------------------|
| Kiya Opstrup | U.S. EPA | " | opstrup.kiya@epa.gov |
|--------------|----------|---|----------------------|

|             |          |   |                     |
|-------------|----------|---|---------------------|
| Sergio Mora | U.S. EPA | " | Mora.Sergio@epa.gov |
|-------------|----------|---|---------------------|

|             |       |     |                     |
|-------------|-------|-----|---------------------|
| DAVID BRITT | USEPA | RPM | britt.david@epa.gov |
|-------------|-------|-----|---------------------|

Name

Agency/Company

Position

Email or phone

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## NOTICE OF INSPECTION

### U.S. ENVIRONMENTAL PROTECTION AGENCY Region IX

Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) §103;  
Emergency Planning and Community Right-to-Know Act (EPCRA) §§302-312; and  
Clean Air Act §112r Risk Management Program (CAA RMP)

DATE/TIME:

5/31/2024 9:00 am

FACILITY NAME: JCI Jones Chemicals Inc.

INSPECTOR (NAME, ADDRESS, PHONE):

US EPA Region 9 (ENF-2-2)  
Kate Kwiecinski  
75 Hawthorne St.  
San Francisco, CA 94105  
(213) 244-1848

FACILITY ADDRESS:

1401 W. Del Amo Blvd.  
Torrance, CA 90501

**REASON FOR INSPECTION:** U. S. EPA is conducting this inspection for the purpose of determining compliance with the requirements of Section 103(e) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), Sections 302 through 312 of the Emergency Planning and Community Right-to-Know Act (EPCRA), and Section 112(r) of the Clean Air Act (CAA).

The scope of this inspection may include, but is not limited to reviewing and obtaining copies of documents and records; interviews and taking of statements; reviewing of chemical manufacturing, importing, processing, and/or use facilities, including waste handling and treatment operations; taking samples and photographs; and any other inspection activities necessary to determine compliance with the Acts.

INSPECTOR SIGNATURE

RECIPIENT SIGNATURE

NAME:

Kate Kwiecinski

NAME

Timothy J. Gaffney

TITLE:

Inspector

DATE SIGNED

5/31/24

TITLE

Executive U.P.

DATE SIGNED

5-31-2024



# RECEIPT OF NOTICE OF RIGHT TO CLAIM CONFIDENTIALITY

## U.S. ENVIRONMENTAL PROTECTION AGENCY Region IX

Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) §103;  
Emergency Planning and Community Right-to-Know Act (EPCRA) §302-312; and  
Clean Air Act §112r(1)(7) General Duty Clause (GDC) & Risk Management Program (RMP)

|  |  |
|--|--|
| DATE/TIME: 5/31/2024   | FACILITY NAME: JCI Jones Chemicals Inc.                              |
| INSPECTOR (NAME, ADDRESS, PHONE):<br><br>US EPA Region 9 (ENF-2-2)<br>Kate Kwiecinski<br>75 Hawthorne St.<br>San Francisco, CA 94105<br>(213) 244-1848 | FACILITY ADDRESS:<br><br>1401 W. Del Amo Blvd.<br>Torrance, CA 90501 |

**Notice of Right to Claim Confidentiality:** You may assert a business confidentiality claim covering all or part of the information requested during the course of this inspection, as provided in 40 C.F.R. §2.203(b). To make a confidentiality claim, submit the requested information and indicate that you are making a claim of confidentiality. Any document over which you make a claim of confidentiality should be marked by either attaching a cover sheet stamped or typed with a legend to indicate the intent to claim confidentiality. The stamp or typed legend or other suitable form of notice should employ language such as trade secret or proprietary or company confidential and indicate a date if any when the information should no longer be treated as confidential.

All confidentiality claims are subject to agency verification and must be made in accordance with 40 C.F.R. §2.208 which provides in part that you satisfactorily show that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so; and that the information is not and has not been, reasonably obtainable by legitimate means without your consent.

**NOTE:** Signature of this Receipt of Notice of Right to Claim Confidentiality verifies only that such notice has been received and does not waive that right.

|                               |                        |                            |                          |
|-------------------------------|------------------------|----------------------------|--------------------------|
| INSPECTOR SIGNATURE<br>       |                        | RECIPIENT SIGNATURE<br>    |                          |
| NAME<br>Kate Kwiecinski       |                        | NAME<br>Timothy J. Gaffney |                          |
| TITLE: EPCRA/RMP<br>Inspector | DATE SIGNED<br>5/31/24 | TITLE<br>Executive V.P.    | DATE SIGNED<br>5-31-2024 |



**DOCUMENT REVIEW/REQUEST LIST**  
**U.S. ENVIRONMENTAL PROTECTION AGENCY**  
**Region IX**

Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) § 103;  
 Emergency Planning and Community Right-to-Know Act (EPCRA) §§ 302-312; and  
 Clean Air Act § 112r Risk Management Program (CAA RMP)

|  |  |
|--|--|
| DATE/TIME:   | FACILITY NAME: <b>JCI Jones Chemicals Inc.</b>                               |
| INSPECTOR (NAME, ADDRESS, PHONE):<br><br>US EPA Region 9 (ENF-2-2)<br>Kate Kwiecinski<br>75 Hawthorne St.<br>San Francisco, CA 94105<br>(213) 244-1848 | FACILITY ADDRESS:<br><br><b>1401 W. Del Amo Blvd.<br/>Torrance, CA 90501</b> |

The following documents were reviewed and/or requested during the inspection unless indicate otherwise. If none of the boxes in the table are checked, the document was only reviewed onsite by the inspection team.

| Document Date | Document Description  | Reviewed Prior to Site Visit | Provided for Offsite Review | Send a Copy to EPA                  |
|---------------|---|------------------------------|-----------------------------|-------------------------------------|
|               | Limble <sup>Task</sup> #1023 Due 5/31/24 *  | <input type="checkbox"/>     | <input type="checkbox"/>    | <input checked="" type="checkbox"/> |
| 12/5/22       | Ultrasonic testing (International Insp)   | <input type="checkbox"/>     | <input type="checkbox"/>    | <input checked="" type="checkbox"/> |
| 10/2/2018     | SOP for compressed Gas Railcar <sup>connection</sup> Disconnection <sup>Release</sup> | <input type="checkbox"/>     | <input type="checkbox"/>    | <input checked="" type="checkbox"/> |
|               | (PR VI 20-28)   | <input type="checkbox"/>     | <input type="checkbox"/>    | <input checked="" type="checkbox"/> |
|               | Documentation that shows leaking sensor <sup>discovered</sup> yesterday               | <input type="checkbox"/>     | <input type="checkbox"/>    | <input checked="" type="checkbox"/> |
|               |   | <input type="checkbox"/>     | <input type="checkbox"/>    | <input type="checkbox"/>            |
|               | *Define task  | <input type="checkbox"/>     | <input type="checkbox"/>    | <input type="checkbox"/>            |
|               |   | <input type="checkbox"/>     | <input type="checkbox"/>    | <input type="checkbox"/>            |
|               |   | <input type="checkbox"/>     | <input type="checkbox"/>    | <input type="checkbox"/>            |
|               |   | <input type="checkbox"/>     | <input type="checkbox"/>    | <input type="checkbox"/>            |
|               |   | <input type="checkbox"/>     | <input type="checkbox"/>    | <input type="checkbox"/>            |

|   |                          |
|---|--------------------------|
| INSPECTOR SIGNATURE                         | RECIPIENT SIGNATURE      |
| NAME: Kate Kwiecinski                       | NAME: Timothy J. Gaffney |
| TITLE: <u>Inspector/Enforcement Officer</u> | TITLE: Executive U.P.    |
| DATE SIGNED: 5/31/24                        | DATE SIGNED: 5/31/2024   |

**Attachment 2:  
Photograph Log and Photographs**

**PHOTOGRAPH LOG AND PHOTOGRAPHS OF AREAS OF CONCERN**

|  |  |
|--|--|
| <b>Facility</b>                          | JCI Jones Chemicals Inc                            |
| <b>Facility Location</b>                 | 1401 W. Del Amo Blvd, Torrance California<br>90501 |
| <b>Photographers</b>                     | Kiya Opstrup                                       |
| <b>Camera Equipment</b>                  | Olympus TG-6 Digital Camera, Model No. IM015       |
| <b>Inspection and Photograph Date(s)</b> | 5/31/2024  |

| <b>Photo ID</b> | <b>Camera ID</b> | <b>Photograph Date</b> | <b>Description</b>  |
|-----------------|------------------|------------------------|---|
| 1               | P5310001.JPG     | 5/31/2024              | JCI Jones Inspection Start  |
| 2               | P5310002.JPG     | 5/31/2024              | Warehouse: Close-up of full, one-ton chlorine containers that are chocked with a piece of wood.   |
| 3               | P5310003.JPG     | 5/31/2024              | Warehouse: Full, one-ton chlorine containers that are chocked with a piece of wood. EPA observed proper chocks on the side of the container as indicated by the arrow.                      |
| 4               | P5310004.JPG     | 5/31/2024              | Warehouse: Full, one-ton sulfur dioxide containers that are chocked with a piece of wood.   |
| 5               | P5310005.JPG     | 5/31/2024              | Warehouse: One full, one-ton sulfur dioxide containers that is unchocked, but located behind crated cylinders.  |
| 6               | P5310006.JPG     | 5/31/2024              | Warehouse: One full, one-ton sulfur dioxide containers that is unchocked, but located behind crated cylinders.  |
| 7               | P5310007.JPG     | 5/31/2024              | Warehouse: View of full, one-ton sulfur dioxide container that is unchocked, but located behind crated cylinders.   |
| 8               | P5310008.JPG     | 5/31/2024              | Warehouse: View of full, one-ton sulfur dioxide container that is unchocked, but located behind crated cylinders.   |
| 9               | P5310009.JPG     | 5/31/2024              | Outside near Fill Stations: View of one-ton sulfur dioxide containers that are unchocked.   |
| 10              | P5310010.JPG     | 5/31/2024              | Chlorine Railcar Platform: Railcar Connection and Disconnection Procedures that are laminated and attached to railing. Sheets are undated and not certified operating procedures.           |
| 11              | P5310011.JPG     | 5/31/2024              | Chlorine Railcar Platform: View of unlabeled chlorine piping (grey). The chlorine piping was observed to vibrate/move when personnel walked up and down the stairs of the platform. Support |

**R9 Enforcement and Compliance Assurance Division**  
**PHOTOGRAPH LOG AND AREAS OF CONCERN**  
 Inspection Date: 5/31/2024

|    |              |           |  |
|----|--------------|-----------|--|
|    |              |           | railing was also observed to be corroded, with peeling paint and pitting.  |
| 12 | P5310012.JPG | 5/31/2024 | Chlorine Railcar Platform: Stairs for the platform. One of the steps was observed to be severely corroded with broken supports.  |
| 13 | P5310013.JPG | 5/31/2024 | Chlorine Railcar Platform: Overview of the stairs for the railcar platform.  |
| 14 | P5310014.JPG | 5/31/2024 | Chlorine Railcar Platform: Overview of the stairs for the railcar platform.  |
| 15 | P5310015.JPG | 5/31/2024 | Chlorine Railcar Loading/Unloading Platform: Overview of the stairs for the railcar platform.  |
| 16 | P5310016.JPG | 5/31/2024 | Chlorine Filling Station 1: Manufacturer valve tag for vacuum return valve.  |
| 17 | P5310017.JPG | 5/31/2024 | Chlorine Filling Station 1: Valves for fill station 1. Valve on right is observed to be more corroded that other valves. Other valves have missing or broken tags. The valve bonnets on the middle and right-hand valves are corroded.       |
| 18 | P5310018.JPG | 5/31/2024 | Chlorine Filling Station 2: Valves for fill station 2. Valve on right is observed to be more corroded than other valves. Other valves have missing or broken tags.   |
| 19 | P5310019.JPG | 5/31/2024 | Close-up of chlorine fill valve (middle valve in Photograph 18). The valve has significant corrosion.  |
| 20 | P5310021.JPG | 5/31/2024 | Chlorine Filling: Chlorine monitor identified as #2 (green) "Cl2 Ton-PRODUCTION FILL" on Photograph 22. The monitor indicates "XX.X." Facility staff indicated that this monitoring was discovered "leaking" the previous day.               |
| 21 | P5310023.JPG | 5/31/2024 | SO2 Filling: SO2 sensor that was observed to be flashing during the inspection. This sensor was documented as #2 (yellow) - "PRODUCTION/SO2" on Photograph 22. Facility staff indicated that the flashing light is a reminder to calibrated. |
| 22 | P5310024.JPG | 5/31/2024 | Production Area: Schematic of the chlorine and sulfur dioxide gas sensors located in the plant.  |
| 23 | P5310025.JPG | 5/31/2024 | Production Area: Liquid chlorine piping (grey) to the bleach plant. The pipe run appeared to not be adequately supported.  |

**R9 Enforcement and Compliance Assurance Division**  
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|    |               |           |  |
|----|---------------|-----------|--|
| 24 | P5310026.JPG  | 5/31/2024 | Production Area: Liquid chlorine piping (grey) to the bleach plant. The pipe run appeared to not be adequately supported.  |
| 25 | P5310027.JPG  | 5/31/2024 | Production Area: Liquid chlorine piping (grey) to the bleach plant. The pipe run appeared to not be adequately supported.  |
| 26 | P5310028.JPG  | 5/31/2024 | Production Area: Caustic soda piping that is corroded and not properly supported.  |
| 27 | P5310029.JPG  | 5/31/2024 | Production Area: Top view of caustic soda piping in Photograph X with missing pipe strap.  |
| 28 | P5310030.JPG  | 5/31/2024 | Production Area: Pipe strap under caustic pipe in Photographs 26 and 27. There is also corrosion on support base.  |
| 29 | P5310031.JPG  | 5/31/2024 | Production Area: Corrosion at the top of bleach plant reactor.   |
| 30 | P5310032.JPG  | 5/31/2024 | Production Area: Liquid chlorine piping feed from the ceiling to the bleach plant was not supported adequately. EPA observed that the inspector could move/jiggle the vertical chlorine piping making is susceptible to accidental bumping and breakage. |
| 31 | P5310033.JPG  | 5/31/2024 | Production Area: Liquid chlorine piping feed from the ceiling to the bleach plant was not supported adequately. EPA observed that the inspector could move/jiggle the piping making is susceptible to accidental breakage.                               |
| 32 | P5310034.JPG  | 5/31/2024 | Production Area: Liquid chlorine piping feed from the ceiling to the bleach plant was not supported adequately. EPA observed that the piping run was only supported in one area.   |
| 33 | IMG_1754.jpeg | 6/10/2024 | Warehouse: Close-up of full, one-ton chlorine containers with proper chocks. Signs posted on the wall stating, "All Tons Must Be Chocked." Photograph provided by the Facility via email on June 17, 2024.   |
| 34 | IMG_1755.jpeg | 6/10/2024 | Warehouse: Close-up of full, one-ton sulfur dioxide containers with proper chocks. Signs posted on the wall stating, "All Tons Must Be Chocked." Photograph provided by the Facility via email on June 17, 2024.   |
| 35 | IMG_1765.jpeg | 6/12/2024 | Outside near Fill Stations: View of one-ton chlorine containers with proper chocks. Signs posted on cones stating, "All Tons   |

**R9 Enforcement and Compliance Assurance Division**  
**PHOTOGRAPH LOG AND AREAS OF CONCERN**  
 Inspection Date: 5/31/2024

|    |                                  |           |   |
|----|----------------------------------|-----------|---|
|    |                                  |           | Must Be Chocked." Photograph provided by the Facility via email on June 17, 2024.   |
| 36 | IMG_1593.jpg                     | 6/14/2024 | Railcar Platform Spot 23: Close-up of newly installed stairs painted yellow. Photograph provided by the Facility via email on June 17, 2024   |
| 37 | IMG_1845.jpeg                    | 6/21/2024 | Railcar Platform Spot 23: View of newly installed stairs painted yellow. Photograph provided by the Facility via email on June 24, 2024.  |
| 38 | Railcar Spot 23.jpeg             | 7/1/2024  | Railcar Platform Spot 23: Complete view of newly installed stairs painted yellow. Photograph provided by the Facility via email on July 2, 2024.  |
| 39 | IMG_1844.jpeg                    | 6/21/2024 | Railcar Platform Spot 24: View of newly installed stairs painted yellow. Photograph provided by the Facility via email on June 24, 2024.  |
| 40 | Railcar Spot 24.jpg              | 7/1/2024  | Railcar Platform Spot 24: Complete view of newly installed stairs painted yellow. Photograph provided by the Facility via email on July 2, 2024.  |
| 41 | Railcar SOPs.jpeg                | 7/1/2024  | Railcar Platform: Updated operating procedures posted by Railcar Platform with revision date at the bottom of the page. Photograph provided by the Facility via email on July 2, 2024.            |
| 42 | Olweny EPA Supports.07.05.24.jpg | 7/5/2024  | Production Area: Additional bracing installed based on recommendations from structural engineering inspection. Photograph provided by the Facility via email on July 15, 2024.                    |
| 43 | Spot 24 Cl2 Bracing.jpg          | 7/15/2024 | Railcar Platform Spot 24: Additional bracing installed based on recommendations from structural engineering inspection. Photograph provided by the Facility via email on July 15, 2024.           |
| 44 | Spot 25 SO2 Brace.jpg            | 7/15/2024 | Railcar Platform Spot 25: Close-up of additional brace installed based on recommendations from structural engineering inspection. Photograph provided by the Facility via email on July 15, 2024. |
| 45 | Spot 25 SO2. Bracing.jpg.png     | 7/15/2024 | Railcar Platform Spot 25: Wide view of additional braces installed based on recommendations from structural engineering inspection. Photograph  |

Inspection Date: 5/31/2024  
Facility: JCI Jones Chemicals Inc

**R9 Enforcement and Compliance Assurance Division**  
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|    |                         |           |   |
|----|-------------------------|-----------|---|
|    |                         |           | provided by the Facility via email on July 15, 2024.  |
| 46 | SO2 Bracing Spot 25.jpg | 7/15/2024 | Railcar Platform Spot 25: New piping and additional braces installed based on recommendations from structural engineering inspection. Photograph provided by the Facility via email on July 15, 2024. |

**R9 Enforcement and Compliance Assurance Division**  
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**Photograph 1 - File: P5310001.JPG**  
JCI Jones Inspection Start

Inspection Date: 5/31/2024  
Facility: JCI Jones Chemicals Inc

**R9 Enforcement and Compliance Assurance Division**  
PHOTOGRAPH LOG AND AREAS OF CONCERN  
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**Photograph 2 - File: P5310002.JPG**

Warehouse: Close-up of full, one-ton chlorine containers that are chocked with a piece of wood.

**R9 Enforcement and Compliance Assurance Division**  
**PHOTOGRAPH LOG AND AREAS OF CONCERN**  
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**Photograph 3 - File: P5310003.JPG**

Warehouse: Full, one-ton chlorine containers that are chocked with a piece of wood. EPA observed proper chocks on the side of the container as indicated by the arrow.

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Facility: JCI Jones Chemicals Inc

**R9 Enforcement and Compliance Assurance Division**  
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**Photograph 4 - File: P5310004.JPG**

Warehouse: Full, one-ton sulfur dioxide containers that are chocked with a piece of wood.

**R9 Enforcement and Compliance Assurance Division**  
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**Photograph 5 - File: P5310005.JPG**

Warehouse: One full, one-ton sulfur dioxide containers that is unchocked, but located behind crated cylinders.

**R9 Enforcement and Compliance Assurance Division**  
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**Photograph 6 - File: P5310006.JPG**

Warehouse: One full, one-ton sulfur dioxide containers that is unchocked, but located behind crated cylinders.

**R9 Enforcement and Compliance Assurance Division**  
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**Photograph 7 - File: P5310007.JPG**

Warehouse: View of full, one-ton sulfur dioxide container that is unchocked, but located behind crated cylinders.

**R9 Enforcement and Compliance Assurance Division**  
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**Photograph 8 - File: P5310008.JPG**

Warehouse: View of full, one-ton sulfur dioxide container that is unchocked, but located behind crated cylinders.

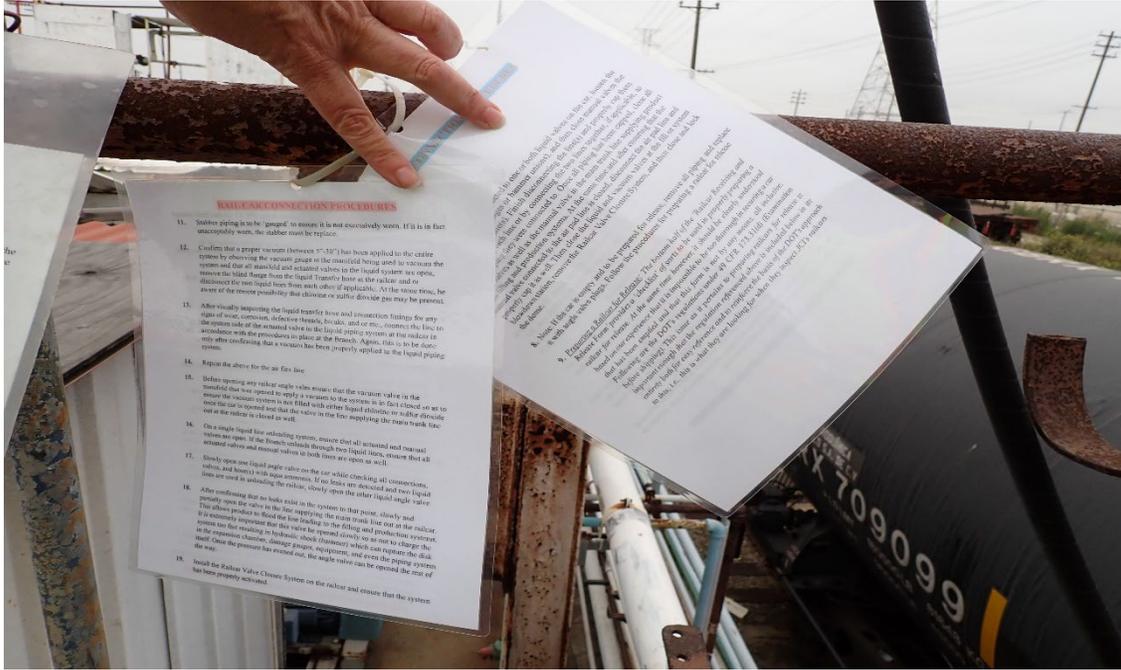
**R9 Enforcement and Compliance Assurance Division**  
**PHOTOGRAPH LOG AND AREAS OF CONCERN**  
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**Photograph 9 - File: P5310009.JPG**

Outside near Fill Stations: View of one-ton sulfur dioxide containers that are unchocked.

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**PHOTOGRAPH LOG AND AREAS OF CONCERN**  
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**Photograph 10 - File: P5310010.JPG**

Chlorine Railcar Platform: Railcar Connection and Disconnection Procedures that are laminated and attached to railing. Sheets are undated and not certified operating procedures.



**Photograph 11 - File: P5310011.JPG**

Chlorine Railcar Platform: View of unlabeled chlorine piping (grey). The chlorine piping was observed to vibrate/move when personnel walked up and down the stairs off the platform. Support railing was also observed to be corroded, with peeling paint and pitting.

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Facility: JCI Jones Chemicals Inc

**R9 Enforcement and Compliance Assurance Division**  
**PHOTOGRAPH LOG AND AREAS OF CONCERN**  
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**Photograph 12 - File: P5310012.JPG**

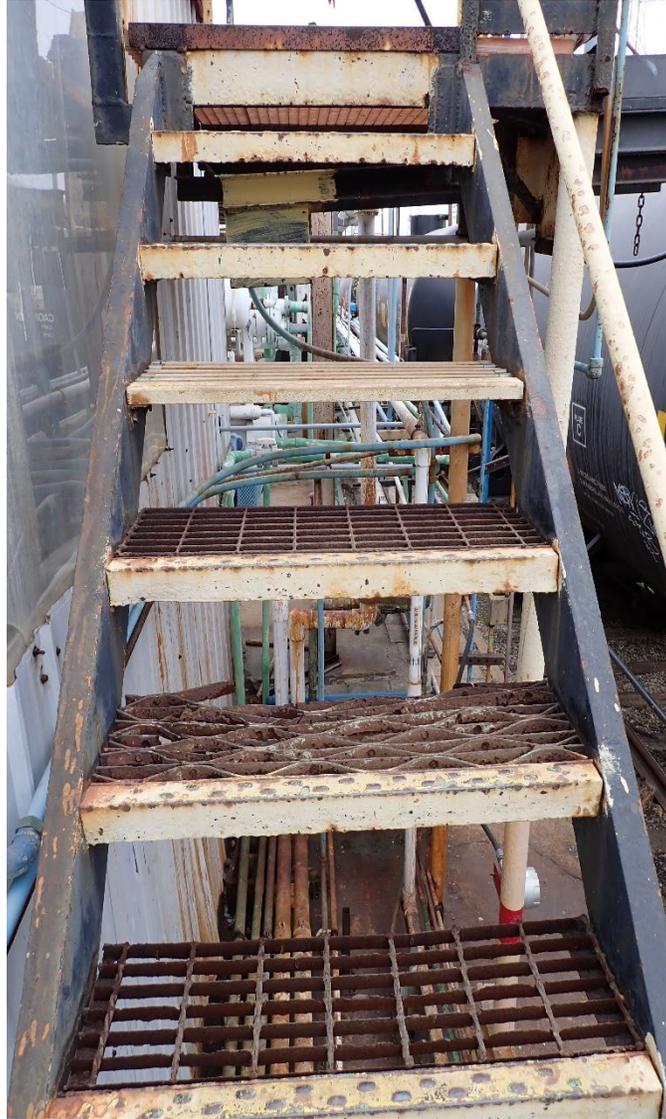
Chlorine Railcar Platform: Stairs for the platform. One of the steps was observed to be severely corroded with broken supports.

**R9 Enforcement and Compliance Assurance Division**  
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**Photograph 13 - File: P5310013.JPG**  
Chlorine Railcar Platform: Overview of the stairs for the railcar platform.

**R9 Enforcement and Compliance Assurance Division**  
**PHOTOGRAPH LOG AND AREAS OF CONCERN**  
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**Photograph 14 - File: P5310014.JPG**  
Chlorine Railcar Platform: Overview of the stairs for the railcar platform.

Inspection Date: 5/31/2024  
Facility: JCI Jones Chemicals Inc

**R9 Enforcement and Compliance Assurance Division**  
**PHOTOGRAPH LOG AND AREAS OF CONCERN**  
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**Photograph 15 - File: P5310015.JPG**

Chlorine Railcar Loading/Unloading Platform: Overview of the stairs for the railcar platform.

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**Photograph 16 - File: P5310016.JPG**

Chlorine Filling Station 1: Manufacturer valve tag for vacuum return valve.



**Photograph 17 - File: P5310017.JPG**

Chlorine Filling Station 1: Valves for fill station 1. Valve on right is observed to be more corroded than other valves. Other valves have missing or broken tags. The valve bonnets on the middle and right-hand valves are corroded.

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**Photograph 18 - File: P5310018.JPG**

Chlorine Filling Station 2: Valves for fill station 2. Valve on right is observed to be more corroded than other valves. Other valves have missing or broken tags.



**Photograph 19 - File: P5310019.JPG**

Chlorine Filling Station 2: Close-up of chlorine fill valve (middle valve in Photograph 18). The valve has significant corrosion.

**R9 Enforcement and Compliance Assurance Division**  
PHOTOGRAPH LOG AND AREAS OF CONCERN  
Inspection Date: 5/31/2024



**Photograph 19a - File: P5310019.JPG**

Chlorine Filling Station 2: Digital close-up of chlorine fill valve in Photograph 19. The valve compression plate and other parts of the valve have significant corrosion.

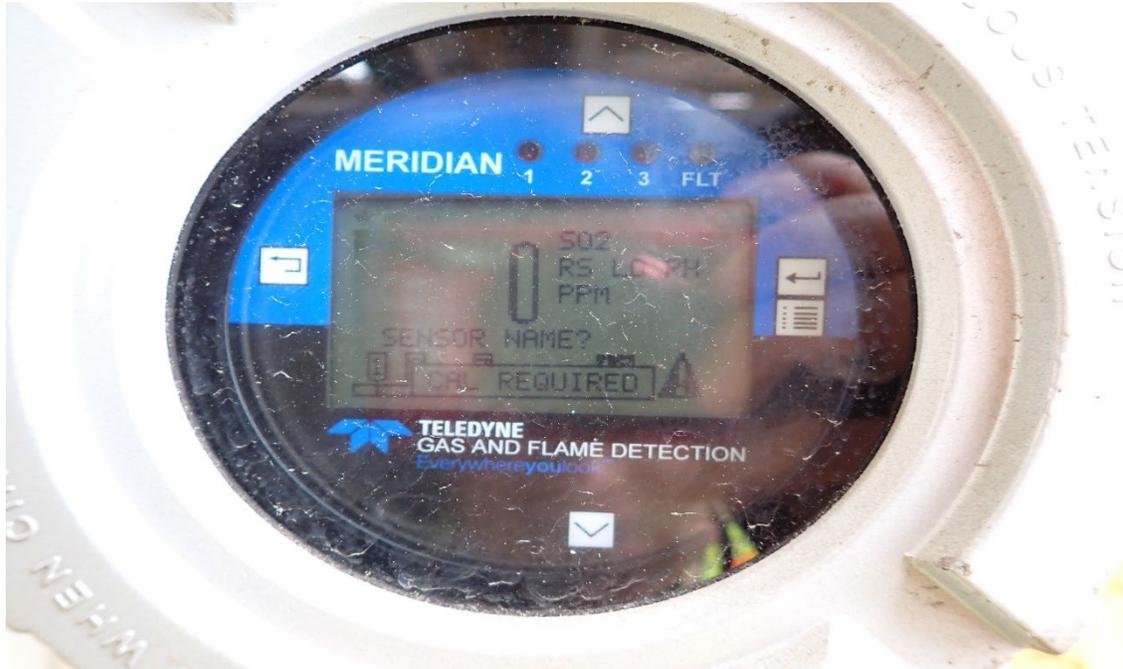
**R9 Enforcement and Compliance Assurance Division**  
**PHOTOGRAPH LOG AND AREAS OF CONCERN**  
Inspection Date: 5/31/2024



**Photograph 20 - File: P5310021.JPG**

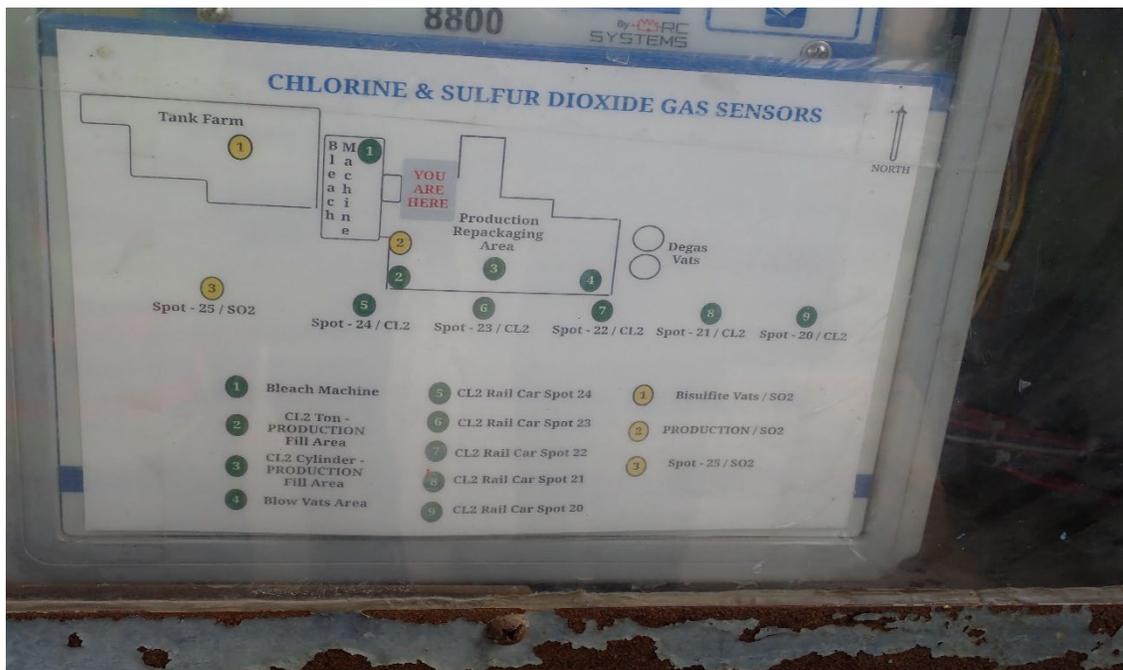
Chlorine Filling: Chlorine monitor identified as #2 (green) "Cl2 Ton- PRODUCTION FILL" on Photograph X. The monitor indicates "XX.X." Facility staff indicated that this monitoring was discovered "leaking" the previous day.

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**Photograph 21 - File: P5310023.JPG**

SO2 Filling: SO2 sensor that was observed to be flashing during the inspection. This sensor was documented as #2 (yellow) - "PRODUCTION/SO2" on Photograph X. Facility staff indicated that the flashing light is a reminder to calibrated.



**Photograph 22 - File: P5310024.JPG**

Production Area: Schematic of the chlorine and sulfur dioxide gas sensors located in the plant.

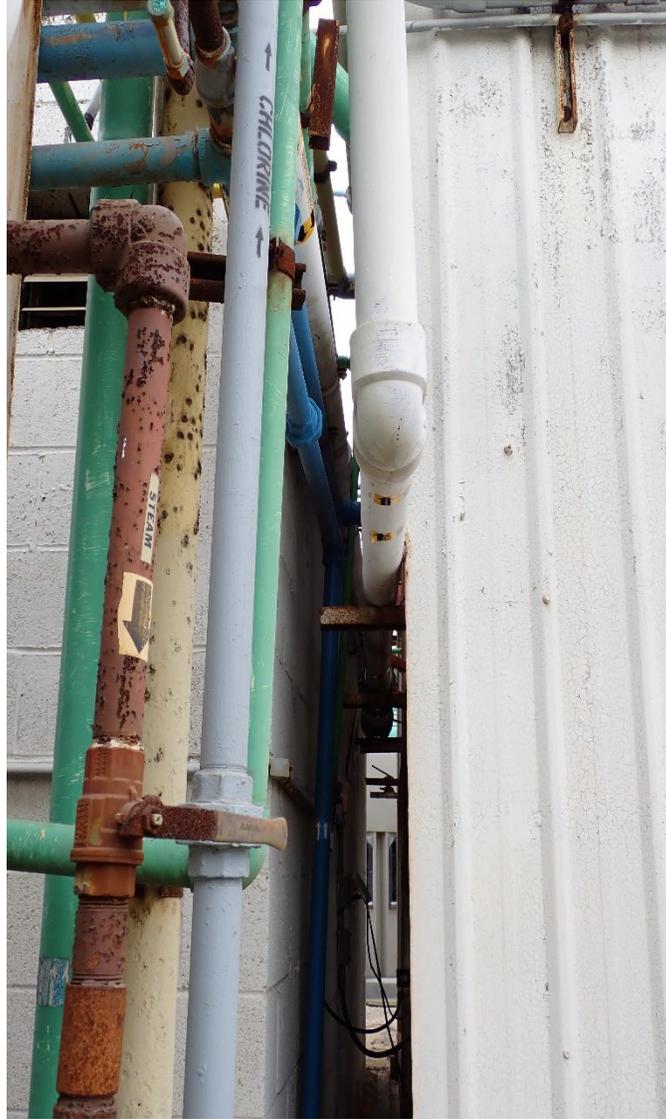
**R9 Enforcement and Compliance Assurance Division**  
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**Photograph 23 - File: P5310025.JPG**

Production Area: Liquid chlorine piping (grey) to the bleach plant. The pipe run appeared to not be adequately supported.

**R9 Enforcement and Compliance Assurance Division**  
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**Photograph 24 - File: P5310026.JPG**

Production Area: Liquid chlorine piping (grey) to the bleach plant. The pipe run appeared to not be adequately supported.

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**Photograph 25 - File: P5310027.JPG**

Production Area: Liquid chlorine piping (grey) to the bleach plant. The pipe run appeared to not be adequately supported.



**Photograph 26 - File: P5310028.JPG**

Production Area: Caustic soda piping that is corroded and not properly supported.