



# Chemical Safety and Hazard Investigation Board

OFFICE OF GENERAL COUNSEL

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Memorandum

To: Board Members

From: Christopher M. Lyon *Chris Lyon*  
Acting General Counsel

Cc: Amanda Johnson, Recommendations Specialist  
Leadership Team

Subject: Board Action Report - Notation Item 2024-10

Date: November 14, 2023

On November 9, 2023, the Board approved Notation Item 2024-10, thereby designating Recommendation 2019-01-I-TX-R1, to the Intercontinental Terminals Company, LLC (from the Intercontinental Terminals Company Tank Fire investigation (2019-01-I-TX)), with the status of Open – Acceptable Response or Alternate Response.

### Voting Summary – Notation Item 2024-10

**Disposition: APPROVED**

**Disposition date: November 9, 2023**

	Approve	Disapprove	Calendar	Not Participating	Date
S. Johnson	X				11/09/2023
S. Owens	X				11/09/2023
C. Sandoval	X				11/09/2023



## U. S. Chemical Safety and Hazard Investigation Board RECOMMENDATION STATUS CHANGE SUMMARY

<b>Report:</b>	Intercontinental Terminals Company (ITC) Tank Fire
<b>Recommendation Number:</b>	2019-01-I-TX-R1
<b>Date Issued:</b>	July 6, 2023
<b>Recipient:</b>	Intercontinental Terminals Company, LLC
<b>New Status:</b>	Open – Acceptable Response or Alternate Response
<b>Date of Status Change:</b>	November 9, 2023

### Recommendation Text:

*Develop and implement a process safety management system for the ITC Deer Park terminal applicable to all atmospheric storage tanks and associated equipment in highly hazardous chemical service. The program should follow industry guidance provided in publications such as the American Petroleum Industry's API STD 2610, Design, Construction, Operation, Maintenance, and Inspection of Terminal and Tank Facilities and the Center for Chemical Process Safety's Guidelines for Risk Based Process Safety.*

### Board Status Change Decision:

#### A. Rationale for Recommendation

On March 17, 2019, a loss of containment and massive fire occurred at the Intercontinental Terminals Company (ITC) terminal facility in Deer Park, Texas. The incident resulted from the seal failure of a pump operating in conjunction with Tank 80-8, an 80,000-barrel (3.36 million gallon) above ground atmospheric storage tank containing a mixture of naphtha and butane.

The incident did not result in any injuries. However, the fire burned for three days and spread from Tank 80-8 to the other fourteen tanks located within the same containment area. All fifteen tanks were destroyed. On March 22, 2019, the containment area wall partially collapsed releasing approximately 500,000 barrels (21 million gallons) of a mixture of petroleum products, firefighting foam, and water into Tucker Bayou and adjacent waterways including the Houston Ship Channel.

The U.S. Chemical Safety and Hazard Investigation Board (CSB) investigated the incident and found several safety issues including ineffective mechanical integrity and maintenance practices for the facility's product transfer pumps, a lack of safety systems at the facility's 80s tank farm, and a lack of regulatory coverage under the Occupational Safety and Health Administration's (OSHA's) Process Safety Management (PSM) standard and the U.S. Environmental Protection Agency's (EPA's) Risk Management Program (RMP) rule for the contents of Tank 80-8 at the time of the incident. As a result of these findings, the CSB issued five recommendations to ITC. This status change summary addresses CSB Recommendation No. 2019-01-I-TX-R1.

B. Response to the Recommendation

ITC notified the CSB that the company has implemented a process safety management system for all atmospheric tanks in chemical service and associated equipment at the Deer Park terminal. The CSB requested additional documentation in order to be able to evaluate the recommendation for closure.

C. Board Analysis and Decision

Based upon the information above, the Board voted to change CSB Recommendation No. 2019-01-I-TX-R1 to: “Open – Acceptable Response or Alternate Response.”