
From: norman rogers [livinn3d@gmail.com]
Sent: Wednesday, July 24, 2013 6:36 PM
To: comments
Subject: Fwd: Tesoro letter to Boxer, Harris, Fienstein.doc

Dear CSB:

I send this letter as a former employee of BP who now, after the recent purchase of our refinery, works for Tesoro. From a Process Safety standpoint that means I have now worked for the two companies that have had the largest loss of life at a U.S. refineries in the last decade. Originally I sent the letter below to the FTC and various State agencies here in California with the hope pause was given and a second look taken at the safety aspects of the sale. Of course the main concerns at the time were issues of too many resources in too few hands, how trade would be effected.

I send this letter now in the hopes the safety aspects of the sale receive further consideration. Though the intent is no longer the vetting of the sale it is to see the proper discipline is used in the race for higher profits. Profitability is a good thing for all concerned but how the MOC is handled in the search for those profits is of the utmost importance. The stage is set for well intentioned people doing as much as they can as fast as they can to not only recoup the money spent in the sale, but to grab those profits that attracted them to make the purchase in the first place. There is a place for the CSB at the table *PRIOR* to there being an incident and I hope the Board acts in that manner.

Regards
Norman A. Rogers

----- Forwarded message -----

From: **Rogers, Norman A** <norman.rogers>
Date: Fri, Apr 12, 2013 at 4:46 PM
Subject: Tesoro letter to the FTC, Kamala Harris, etc.

- On March 23rd, 2005 the BP Texas City Refinery suffered a tragic explosion that resulted in fifteen people losing their lives and over another 170 being seriously injured.
- This incident initiated a wave of changes at BP to help insure such an event never happened again.
- To its credit, and despite other tragic events that have happened in the intervening years, BP has done much to improve its Process Safety programs.



- One of the many findings that came out of the incident investigation was after BP purchased the Texas City Refinery from Amoco in the late 1990's, the focus became maintaining the refinery production numbers while actual running maintenance took a back seat.
- Flash forward to April 2, 2010 to the Tesoro Anacortes Refinery in Washington State. At 12:35 that morning, the piece of equipment below, a heat exchanger, suffered a catastrophic failure resulting in the release of vapors that ignited and eventually claimed seven lives.



- Though Tesoro officials disagreed, the head of the Chemical Safety Board indicated the company didn't adequately maintain its equipment. Washington state examiners proclaimed the incident preventable.

My concern is Tesoro's purchase of BP's California refinery is ripe to be a repeat of BP's purchase of the Texas City Refinery. Tesoro, through its words and deeds, has shown it is all about efficiencies and driving down costs and when this attitude prevails, it's ultimately meant production concerns win out over maintenance concerns. As a case in point, BP's Carson Refinery spent \$100+ million on maintenance and upgrades in just one area of its refinery. Contrast that with Tesoro spending \$400 million over its entire operation of nine refineries. And in addition to the "run at all costs" mindset that puts life and limb in harm's way, the Southern

California market surely suffers with too much refining capacity in too few hands. I strongly urge the sale not be allowed to go through.

As a footnote, the Anacortes refinery was down for six months after its explosion. The Southern California market cannot afford such an event.