



U.S. Chemical Safety and Hazard Investigation Board

OFFICE OF GENERAL COUNSEL

Memorandum

To: Board Members

From: Steven Messer
Acting General Counsel

Cc: Leadership Team
Adam Henson

Subject: Board Action Report – Notation Item 2025-43 | Recommendation to the Ohio Refining Company (ORC) (2022-01-I-OH-R2) from the BP – Husky Oregon Chemical Release and Fire investigation (2022-01-I-OH)

Date: May 15, 2025

On May 13, 2025, the Board approved Notation Item 2025-43, thereby designating Recommendation 2022-01-I-OH-R2 with the status of Closed – Acceptable Alternative Action and authorizing the publication of the Recommendations Status Change Summary for this change on the CSB's website.

Voting Summary – Notation Item 2025-43

Disposition: APPROVED

Disposition date: May 13, 2025

	Approve	Disapprove	Calendar	Not Participating	Date
S. Johnson	X				5/12/2025
S. Owens	X				5/12/2025
C. Sandoval	X				5/13/2025



U. S. Chemical Safety and Hazard Investigation Board

RECOMMENDATION STATUS CHANGE

SUMMARY

Report:	BP – Husky Oregon Chemical Release and Fire
Recommendation Number:	2022-01-I-OH-R2
Date Issued:	June 24, 2024
Recipient:	Ohio Refining Company
New Status:	Closed – Acceptable Alternative Action
Date of Status Change:	May 13, 2025

Recommendation Text:

Revise the Abnormal Situation Management policy to incorporate guidance provided by the ASM Consortium and the Center for Chemical Process Safety (CCPS). The revised policy should include, at a minimum:

- a) A broader definition of abnormal situations, such as that defined by the CCPS,*
- b) Additional predictable abnormal situations and their associated corrective procedures.*

At a minimum include the following abnormal situations:

 - 1) unplanned crude slate changes,*
 - 2) continued operation of the Crude 1 unit with the naphtha hydrotreater unit shut down, and*
 - 3) an emergency pressure-relief valve opening.*
- c) Guidance to determine when an abnormal situation is becoming too difficult to manage and the appropriate actions to take, such as shutting down a process, putting it into a circulation mode, or implementing proper procedures for bringing it to a safe state.*

Board Status Change Decision:

A. Rationale for Recommendation

On September 20, 2022, a vapor cloud ignited at the BP-Husky Refining LLC (“BP Husky”) refinery in Oregon, Ohio. The vapor cloud formed when flammable liquid naphtha was intentionally released from a pressurized vessel to the ground in response to an abnormal situation. Two employees were fatally injured. BP Husky estimated that over 23, 000 pounds of naphtha was released during the event, and that \$597 million in damage was incurred.

The U.S. Chemical Safety and Hazard Investigation Board (CSB) investigated the incident and found several safety issues including inadequate safeguarding to prevent liquid overflow, ineffective abnormal situation management, and failure to learn from previous incidents. As a result of these findings, the CSB issued four recommendations to the Ohio Refining Company LLC. This status change summary addresses CSB Recommendation No. 2022-01-I-OH-R2.

B. Response to the Recommendation

The Ohio Refining Company (ORC) notified the CSB that the scope of their abnormal situation management policy does not support the scope of changes sought by the recommendation. They did, however, create or revise several other programs and policies that implemented all of the requirements of the recommendation. Upon review of the information ORC provided, the CSB concluded that ORC's abnormal situation management policy in conjunction with their new and updated programs and policies meet the objective of the recommendation envisioned by the Board.

C. Board Analysis and Decision

Based upon the information above, the Board voted to change the status of CSB Recommendation No. 2022-01-I-OH-R2 to: "Closed – Acceptable Alternative Action."