U.S. Chemical Safety and Hazard Investigation Board

OFFICE OF GENERAL COUNSEL

Memorandum

To: Board Members

From: Steven Messer
Acting General Counsel

Cc: Charles Barbee
Adam Henson
Leadership Team

Subject: Board Action Report – Notation Item 2025-52 | Recommendation to the American Petroleum Institute (API) (2019-01-I-TX-R6) from the Intercontinental Terminals Company (ITC) Tank Fire investigation (2019-01-I-TX)

Date: June 10, 2025

On June 10, 2025, the Board approved Notation Item 2025-52, thereby designating Recommendation 2019-01-I-TX-R6 to the American Petroleum Institute (API) from the Intercontinental Terminals Company (ITC) Tank Fire investigation (2019-01-I-TX) with the status of Open – Acceptable Response or Alternate Response.

Voting Summary – Notation Item 2025-52

Disposition: APPROVED

Disposition date: June 10, 2025

	Approve	Disapprove	Calendar	Not Participating	Date
S. Johnson	**X**				6/3/2025
S. Owens	**X**				6/3/2025
C. Sandoval	**X**				6/10/2025

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

Report:	Intercontinental Terminal Company (ITC) Tank Fire
Recommendation Number:	2019-01-I-TX-R6
Date Issued:	July 6, 2023
Recipient:	American Petroleum Institute (API)
New Status:	Open – Acceptable Response or Alternate Response
Date of Status Change:	June 10, 2025

Recommendation Text:

Update API STD 2610, Design, Construction, Operation, Maintenance, and Inspection of Terminal and Tank Facilities, or other appropriate products to include flammable gas detection systems within the leak detection section or where appropriate. The discussion of flammable gas and/or leak detection should address both engineering and administrative controls, including actions associated with responding to a catastrophic or emergency leak.

Board Status Change Decision:

A. Rationale for Recommendation

On March 17, 2019, a loss of containment and 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 gallon) 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 standard (PSM) and the Environmental Protection Agency's (EPA's) Risk Management Program rule (RMP) for the contents of tank 80-8 at the time of the incident. As a result of these findings, the CSB issued one recommendation to the American Petroleum Institute (API). This status change summary addresses CSB Recommendation No. 2019-01-I-TX-R6.

B. Response to the Recommendation

API has notified the CSB that they intend to implement the recommendation. They have provided a plan of action and proposed language for potential inclusion in API Standard 2610 *Design, Construction, Operation, Maintenance, and Inspection of Terminal and Tank Facilities* that appears to satisfy the objectives of the recommendation. Additionally, they have provided a timetable for completion.

C. Board Analysis and Decision

Based upon the information above, the Board voted to change CSB Recommendation No. 2019-01-I-TX-R6 to: "Open – Acceptable Response or Alternate Response."