



U.S. Chemical Safety and Hazard Investigation Board

OFFICE OF GENERAL COUNSEL

Memorandum

To: Board Members

From: Steven Messer
Acting General Counsel

STEVEN
MESSER

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STEVEN MESSER
Date: 2026.05.14
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Cc: Charles Barbee
Adam Henson
Leadership Team

Subject: Board Action Report – Notation Item 2026-31 | Recommendation to American Petroleum Institute (API) (2019-01-I-TX-R6) from the Intercontinental Terminal Company (ITC) Tank Fire investigation (2019-01-I-TX)

Date: May 14, 2026

On May 13, 2026, the Board approved Notation Item 2026-31, thereby designating Recommendation 2019-01-I-TX-R6 to American Petroleum Institute (API) from the Intercontinental Terminal Company (ITC) Tank Fire investigation (2019-01-I-TX) with the status of Closed – Exceeds Recommended Action.

Voting Summary – Notation Item 2026-31

Disposition: APPROVED

Disposition date: May 13, 2026

	Approve	Disapprove	Calendar	Not Participating	Date
S. Johnson	X				5/13/2026
S. Owens	X				5/13/2026



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:	Closed – Exceeds Recommended Action
Date of Status Change:	May 13, 2026

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 published the 4th Edition of API Standard 2610 *Design, Construction, Operation, Maintenance, and Inspection of Terminal and Tank Facilities*¹ (API STD 2610) in March of 2026. The CSB reviewed the new edition of the standard and found that new information and requirements pertinent to flammable gas detection². During the CSB’s review it was also noted that substantive improvements to the standards section on safety management³ had also been made. These improvements include adding additional information for reference and context in implementing process safety into terminal and tank facilities. Also, the adoption of four new elements into the section which more closely align the information presented in the section with the practices recognized as necessary for effective safety management.⁴

C. Board Analysis and Decision

In updating API STD 2610 to more effectively address flammable gas detection the API has met the objective of the recommendation. By revising and expanding the standard’s section on safety management the API has taken an extra step to prevent future risk which surpasses the objective of the recommendation.

The Board appreciates the work of the leadership and staff of the API in addressing this recommendation and the work of the API’s Subcommittee on Aboveground Storage Tanks (SCAST) in making these important updates to the standard. By incorporating the lessons learned from the ITC Tank Fire investigation into the standard, and expanding the elements covered by the safety management section, important steps have been taken to reduce future risk experienced by these facilities and surrounding communities.

The CSB has been calling for more effective safety regulation for these facilities for over twenty years⁵ and is encouraged by industry’s voluntary adoption of these practices in the face of regulatory inaction. Based upon the information above, the Board voted to change CSB Recommendation No. 2019-01-I-TX-R6 to: “Closed – Exceeds Recommended Action.”

¹ <https://www.apiwebstore.org/standards/2610>

² Updates responsive to the recommendation were made to Sections 2, 3, 4, 7, 8, 10, and 11 of API STD 2610.

³ Section 6 Safe Operations of Terminals and Tanks

⁴ The new elements in Section 6 are Operations Safety Information, Compliance Audits, Employee Participation, and Trade Secrets.

⁵ Motiva Enterprises Sulfuric Acid Tank Explosion (2001) and CAPECO Refinery Tank Explosion and Fire (2009)