



U.S. Chemical Safety and Hazard Investigation Board

OFFICE OF GENERAL COUNSEL

Memorandum

To: Board Members

From: Steven Messer
General Counsel

STEVEN
MESSER

Digitally signed by
STEVEN MESSER
Date: 2026.07.13
12:10:16 -04'00'

Cc: Charles Barbee
Adam Henson
Leadership Team

Subject: Board Action Report – Notation Item 2026-49 | Recommendation to the American Petroleum Institute (API) (2022-01-I-OH-R6) from the BP – Husky Oregon Chemical Release and Fire investigation (2022-01-I-OH)

Date: July 13, 2026

On July 10, 2026, the Board approved Notation Item 2026-49, thereby designating Recommendation 2022-01-I-OH-R6 to the American Petroleum Institute (API) from the BP – Husky Oregon Chemical Release and Fire investigation (2022-01-I-OH) with the status of Open – Acceptable Response or Alternate Response.

Voting Summary – Notation Item 2026-49

Disposition: APPROVED

Disposition date: July 10, 2026

	Approve	Disapprove	Calendar	Not Participating	Date
S. Johnson	X				7/9/2026
S. Owens	X				7/10/2026



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-R6
Date Issued:	June 24, 2024
Recipient:	American Petroleum Institute (API)
New Status:	Open – Acceptable Response or Alternate Response
Date of Status Change:	July 10, 2026

Recommendation Text:

Develop a publication that addresses preventing the overflow of pressure vessels such as towers and drums. The publication should be applicable to both new and existing pressure vessels. Include the following at a minimum:

- a) Description of typical overflow events that could result during normal, upset, or transient operations (startup, shutdown, standby) including the formation of a vapor cloud,*
- b) Recommended practices for instrumentation to monitor and detect a pressure vessel overflow,*
- c) Process hazard analysis guidance for pressure vessel overflow scenarios,*
- d) Recommended practices for safeguards to prevent a pressure vessel overflow,*
- e) Recommended field and board operator process safety training topics and methods to prevent a pressure vessel overflow,*
- f) Guidelines for process safety assessments to prevent a pressure vessel overflow, and*
- g) Incorporate lessons learned from this CSB investigation and the CSB's BP Texas City Refinery investigation throughout the document.*

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 two recommendations to the American Petroleum Institute (API). This status change summary addresses CSB Recommendation No. 2022-01-I-OH-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 in a new draft publication developed in response to the recommendation 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. 2022-01-I-OH-R6 to: “Open – Acceptable Response or Alternate Response.”