



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

<b>Report:</b>	MGPI Processing, Inc. Toxic Chemical Release
<b>Recommendation Number:</b>	2017-01-I-KS-R3
<b>Date Issued:</b>	January 3, 2018
<b>Recipient:</b>	Harcros Chemicals, Inc.
<b>New Status:</b>	Closed – Acceptable Action
<b>Date of Status Change:</b>	January 20, 2021

### Recommendation Text:

*Establish a refresher training program to ensure drivers know the location of various CTMV [cargo tank motor vehicle] emergency shut-off devices, when to use them, and the effectiveness of those devices to stop the flow of chemicals during emergencies. The refresher training program should include drills for drivers to simulate the activation of all shut-off devices in defined incident scenarios (e.g., inadvertent mixing, chemical releases, etc.) during unloading operations. Establish a process to evaluate the effectiveness of the refresher training program.*

### Board Status Change Decision:

#### A. Rationale for Recommendation

On October 21, 2016, a chemical release occurred at the MGPI Processing, Inc. (MGPI) plant in Atchison, Kansas. The release occurred when a chemical delivery truck, owned and operated by Harcros Chemicals, Inc. (Harcros) was inadvertently connected to a tank containing incompatible material. The plume generated by the chemical reaction led to a shelter-in-place order for thousands of residents. At least 120 employees and members of the public sought medical attention.

The U.S. Chemical Safety Board found that when the release occurred, the driver could not activate the emergency shut-off devices on either side of the vehicle without being exposed to the gas and was not aware of the emergency shut-off device in the cab of the vehicle. As a result, the CSB issued two recommendations to Harcros to address those issues. This status change summary addresses CSB Recommendation No. 2017-01-I-KS-R3 (R3).

#### B. Response to the Recommendation

Harcros responded in January 2018, informing the CSB that they had already begun implementing the recommendation and provided additional details. Specifically, they stated that Harcros conducted Tanker Emergency Shut-Off training for Kansas City based bulk delivery truck drivers on November 14, 2017. Their hands-on training consisted of the following elements.

- Location of tanker emergency shut-off devices;
- When and how to use the emergency shut-off devices; and

- Practical exercise to simulate activation in the event of inadvertent mixing or chemical release during unloading operations.

They determined effectiveness of the training by having each bulk delivery truck driver demonstrate that they knew where each emergency shut-off device was located on the different types of Harcros tankers and explain how to activate them. Harcros then administered this training course to all Harcros locations servicing bulk delivery customers prior July 1, 2018.

In October 2020, the CSB obtained and reviewed training course attendance records and training information to verify the information provided in Harcros's response.

#### C. Board Analysis and Decision

As the above actions satisfy the intent of the CSB recommendation, the Board voted to change the status of CSB Recommendation No. 2017-01-I-KS-R3 to: "Closed – Acceptable Action."