



Chemical Safety and Hazard Investigation Board

OFFICE OF GENERAL COUNSEL

Memorandum

To: Board Members

From: Chris Lyon *Chris Lyon*
Acting General Counsel

Cc: Amanda Johnson, Recommendations Specialist
Leadership Team

Subject: Board Action Report – Notation Item 2024-27

Date: December 21, 2023

On December 20, 2023, the Board approved Notation Item 2024-27, thereby designating Recommendation 2018-03-I-TX-R4, to Kuraray America, Inc. (from the Kuraray Pasadena Release and Fire investigation (2018-03-I-TX)), with the status of Open – Acceptable Response or Alternate Response.

Voting Summary – Notation Item 2024-27

Disposition: APPROVED

Disposition date: December 20, 2023

	Approve	Disapprove	Calendar	Not Participating	Date
S. Johnson	X				12/20/2023
S. Owens	X				12/20/2023
C. Sandoval	X				12/20/2023



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

Report:	Kuraray Pasadena Release and Fire
Recommendation Number:	2018-03-I-TX-R4
Date Issued:	December 21, 2022
Recipient:	Kuraray America, Inc.
New Status:	Open – Acceptable Response or Alternate Response
Date of Status Change:	December 20, 2023

Recommendation Text:

Develop and implement a policy detailing how to effectively address recommendations generated from company process safety management systems, including audits, incident investigations, management of change, and process hazard analysis that is consistent with existing OSHA guidance. Include a periodic training requirement for managers and other employees involved in evaluating and managing proposed recommendations to help ensure safety improvements are effectively evaluated and appropriately implemented.

Board Status Change Decision:

A. Rationale for Recommendation

On the morning of May 19, 2018, the pressure relief devices of a reactor used to make ethylene and vinyl alcohol copolymer (EVAL) activated and discharged ethylene into the air through horizontally oriented discharge piping. The resulting flammable vapor cloud found a heat source and ignited. The fire burned for approximately three minutes until enough ethylene was released to reduce the pressure inside the reactor to allow the pressure relief valve to close. Kuraray America, Inc. (Kuraray) reported releasing 2,347 pounds of ethylene. Several workers sustained injuries resulting from the fire as well as from trying to escape the fire. Twenty-one injured workers were transported to off-site medical facilities for treatment. Additionally, two workers were life-flighted from the Kuraray facility.

The U.S. Chemical Safety and Hazard Investigation Board (CSB) investigated the incident and found several safety issues including failures in pressure-relief system discharge design, excluding non-essential personnel during transient operations, and weakly implemented process safety management system elements. As a result of these findings, the CSB issued twelve recommendations to Kuraray. This status change summary addresses CSB Recommendation No. 2018-03-I-TX-R4.

B. Response to the Recommendation

Kuraray notified the CSB that the company has updated its corporate process hazard analysis policy to provide a more detailed explanation of how to effectively address company recommendations that includes a periodic training requirement for managers and other employees. Once the CSB receives information on how Kuraray has updated its policy for audits,

incident investigations, and management of change, provided the information addresses the intent of the recommendation, the CSB can evaluate this recommendation for closure.

C. Board Analysis and Decision

Based upon the information above, the Board voted to change CSB Recommendation No. 2018-03-I-TX-R4 to: “Open – Acceptable Response or Alternate Response.”