



U.S. Chemical Safety and Hazard Investigation Board

OFFICE OF GENERAL COUNSEL

Memorandum

To: Board Members

From: Christopher M. Lyon *Christopher M. Lyon*  
Acting General Counsel

Cc: Amanda Johnson  
Adam Henson  
Leadership Team

Subject: Board Action Report – Notation Item 2024-77

Date: May 22, 2024

On May 21, 2024, the Board approved Notation Item 2024-77, thereby designating Recommendation 2019-04-I-PA-R1, to the Environmental Protection Agency, from the Philadelphia Energy Solutions (PES) Refinery Fire and Explosions investigation (2019-04-I-PA), with the status of Open – Acceptable Response or Alternate Response.

**Voting Summary – Notation Item 2024-77**

**Disposition: APPROVED**

**Disposition date: May 21, 2024**

	Approve	Disapprove	Calendar	Not Participating	Date
S. Johnson	X				5/21/2024
S. Owens	X				5/21/2024
C. Sandoval	X				5/21/2024



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

<b>Report:</b>	Philadelphia Energy Solutions (PES) Refinery Fire and Explosions
<b>Recommendation Number:</b>	2019-04-I-PA-R1
<b>Date Issued:</b>	October 11, 2022
<b>Recipient:</b>	Environmental Protection Agency (EPA)
<b>New Status:</b>	Open – Acceptable Response or Alternate Response
<b>Date of Status Change:</b>	May 21, 2024

### Recommendation Text:

*Develop a program that prioritizes and emphasizes inspections of refinery HF alkylation units, for example under EPA's National Compliance Initiative called Reducing Risks of Accidental Releases at Industrial and Chemical Facilities. As part of this program, verify that HF alkylation units are complying with API RP 751 Safe Operation of Hydrofluoric Acid Alkylation Units, including but not limited to the implementation of a special emphasis inspection program to inspect all individual carbon steel piping components and welds to identify areas of accelerated corrosion; the protection of safety-critical safeguards and associated control system components, including but not limited to wiring and cabling for control systems and primary and backup power supplies, from fire and explosion hazards including radiant heat and flying projectiles (per recommendation 2019-04-I-PA-R4); and the installation of remotely-operated emergency isolation valves on the inlet(s) and outlet(s) of all hydrofluoric acid containing vessels, and hydrocarbon containing vessels meeting defined threshold quantities (per recommendation 2019-04-I-PA-R4).*

### Board Status Change Decision:

#### A. Rationale for Recommendation

On the morning of June 21, 2019, a pipe elbow in the Philadelphia Energy Solutions (PES) hydrofluoric acid (HF) alkylation unit ruptured. A large vapor cloud—composed of about 95% propane, 2.5% HF, and other hydrocarbons—engulfed part of the unit. The vapor cloud ignited, causing a large fire. Three explosions then occurred in the unit. The third explosion was the largest and occurred when a pressure vessel violently ruptured and flew across the Schuylkill River. Two other pressure vessel fragments, one weighing about 23,000 pounds and the other 15,500 pounds, landed in the PES refinery.

PES estimated that 5,239 pounds of HF and 676,000 pounds of hydrocarbons were released during the incident. The HF alkylation unit was severely damaged resulting in an estimated property damage loss of \$750 million. Five workers and a firefighter experienced minor injuries during the incident and response. On June 26, 2019, PES announced that the refining complex would be shutting down.

The U.S. Chemical Safety and Hazard Investigation Board (CSB) investigated the incident and found several safety issues to include process safety management and other safety related standards. There were issues with PES's mechanical integrity program and their verification of safety of equipment when new safety information is discovered and published in Recognized and Generally Accepted Good Engineering Practices (RAGAGEP). Additionally, the CSB identified gaps regarding standards or regulations that address remotely operated emergency isolation valves, safeguard reliability in HF alkylation units, as well as inherently safer design considerations specific to the use of HF. As a result of these findings, the CSB issued three recommendations to the EPA. This status change summary addresses CSB Recommendation No. 2019-04-I-PA-R1.

#### B. Response to the Recommendation

The EPA announced their FY 2024 – 2027 National Enforcement and Compliance Initiatives. The Chemical Accident Risk Reduction initiative was continued from the previous cycle with an emphasis on addressing noncompliance at facilities using hydrogen fluoride (HF). The EPA cites recent incidents involving the release or potential release of HF and the potentially catastrophic consequences of such releases as justification for focusing on these facilities<sup>1</sup>. Further, the EPA provided their plan for addressing the requirements of the recommendation and a timeline for its completion.

#### C. Board Analysis and Decision

The Board commends the leadership and staff of the EPA for their efforts thus far in implementing this important chemical safety recommendation. Based upon the information above, the Board voted to change CSB Recommendation No. 2019-04-I-PA-R1 to: "Open – Acceptable Response or Alternate Response."

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<sup>1</sup> According to a memo from David M. Uhlmann, Assistant Administrator, EPA dated August 17, 2023. Accessed on April 11, 2024 at <https://www.epa.gov/system/files/documents/2023-08/fy2024-27necis.pdf>