

2015 Torrance Refinery Explosion: Industry Impacts Then and Now

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Agenda

- About the CSB
- Fluid Catalytic Cracking Overview
- Transient Operations
- 2015 Torrance, CA Incident Break
- 2018 Superior, WI Incident
- Industry Response
- Hydrogen Fluoride Near-Misses
- California PSM Reform

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About the CSB

- Independent federal agency
- The "Board" is a group of 5 individuals nominated by the President
- From 42 U.S. Code § 7412 (6)(C)(i):
 - "The Board shall investigate...determine and <u>report to the</u> <u>public in writing</u>...the <u>cause</u> or <u>probable cause</u> of any accidental release resulting in fatality, serious injury, or significant property damages."
- Companies are required to report incidents to the CSB (40 C.F.R. Part 1604)





About the CSB

All completed investigation reports are available at <u>www.csb.gov</u>







Torrance Refinery Overview



CALIFORNIA CUPA FORUM City of Torrance incorporated in 1921

Refinery constructed in 1928-29



Torrance Refinery Overview

Refinery Proximity to Public Receptors: Within a 3-mile radius of

the refinery, there are:

- 330,000 people
- 71 schools
- 8 hospitals



The FCC converts low-value, thick oil to higher value gasoline by "cracking" the large molecules apart into smaller molecules





Refinery

Coking

Select Type ✓ Asphalt Refinery Refinery Upgrader

Select Region Western Canada

Ontario Mexico PADD 1

PADD 2

PADD 3 PADD 4





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Asphalt Refinery FCC Units in Northern California (as of 1/1/23) Select Refining Type Atmospheric Distillation Richmond Chevron Vacuum Distillation Catalytic Cracking Alkylation and Isomerizatio Viscosity Reduction PBF Martinez Hydrodesulphurization Asphalt Production Catalytic Reforming Valero Benicia FCC Units in Southern California (as of 1/1/23) **El Segundo** Chevron **Quebec & Eastern Canada** Phillips 66 Wilmington Marathon Carson PBF Torrance

Wilmington

Valero Source: EIA













Transient Operations

Transient Operation:

The operating mode when the process is in transition and is not in its normal operations mode.

Examples:

Startup, shutdown, standby, emergency, procedure-based operations

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Transient Operations



2015 Torrance, CA Incident



ExxonMobil Torrance Refinery Electrostatic Precipitator Explosion Torrance, California Incident Date: February 18, 2015 On-Site Property Damage, Catalyst Particles Released to Community, Near Miss in MHF Alkylation Unit No. 2015-02-FCA



Published May 2017

CSB · ExxonMobil Torrance Refinery Investigation Report

February 18, 2015 FCC unit was idled for unplanned maintenance Pressure deviation allowed hydrocarbons to backflow in the process and ignite in the ESP

Consequences:

Four contractors sought first aid; no serious injuries/ fatalities Catalyst dust dispersed into the community

CSB report / YouTube video



2015 Torrance, CA Incident

Safety Issues Identified by the CSB:

- 1. Safe Operating Limits: Lack of "safe park" procedure and verifiable operating parameters
- 2. Process Hazard Analysis: Reliance on 2012 variance without verifying safeguards
- 3. Mechanical Integrity
- 4. ESP Operation
- 5. Refinery management permitted opening process equipment without confirming to refinery standards



Industry Responses to Torrance Incident

- CSB investigation lessons shared widely across the refining industry
- YouTube video used as training tool
- Most refiners now automatically shut down the ESP during FCC unit transient operations
 - Process safety vs. Environmental impact
 - EPA updated <u>40 C.F.R. § 63.1564(a)(5)</u>

Deployment Activities





Stretch Break





April 26, 2018

FCC unit was shutting down for a planned turnaround Two vessels exploded around 10:00 a.m. Explosion debris struck asphalt storage tank Asphalt fire around 12:00 p.m. Evacuation lifted at 6:00 a.m. the next morning

Consequences:

36 injuries (including 11 OSHA recordable injuries); no fatalities 39,000 pounds of flammable hydrocarbon vapor released \$550 million property damage

CSB report / YouTube video







Source: WDIO ABC News





Source: Douglas County, Wisconsin

Safety Issues Identified by the CSB:

- 1. Transient Operation Safeguards
- 2. Process Knowledge
- 3. Process Safety Management Systems
- 4. Industry Knowledge and Guidance
- 5. Brittle Fracture During Extreme Events
- 6. Emergency Preparedness





Refinery's FCC technology knowledge was not sufficient to safely shut down the FCC unit. As a result, <u>refinery workers were not aware of explosion risk</u>

CSB recommendations to Cenovus Energy:

- Develop an FCC PHA guidance document for use at all Cenovus-operated refineries
- Develop and implement a technology-specific knowledge-sharing network program across all Cenovus-operated refineries, which at a minimum includes an FCC technology peer network



- Husky Superior Refinery knew about the Torrance incident, but workers did not recognize that inadvertent flow in the reverse direction was also possible
- Similar knowledge gaps may exist at other U.S. refineries
- Many different FCC unit designs exist through multiple technology licensors
- Currently, there is no industry publication that establishes common basic process safety expectations for all FCC units



Industry Response to Both FCC Incidents

- 2015: Torrance incident
- 2017: CSB publishes Torrance report; shared in conferences



- 2018: Superior incident; CSB publishes factual investigative update
- **2019:** Refining industry survey on safe FCC operating practices
- **2020:** Webinar on safeguarding the FCC unit during transient operation
- 2020-2022: AFPM publishes multiple webinars and practice sharing documents
- 2022: CSB publishes Superior report
- 2023-2025: FCC Process Safety Regional Workshops ("Safety Roadshow")

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Open CSB Recommendations for FCC Units

CSB Recommendation to API:

Develop a publicly available technical publication for the safe operation of FCC units

CSB Recommendation to EPA:

Develop a program that prioritizes and emphasizes inspections of FCC units in refineries that operate HF alkylation units



Hydrogen Fluoride (HF) Near-Misses

- HF acid is a toxic chemical and poses a severe hazard to the population and environment when a release occurs
- Causes severe damage to skin, respiratory system, and bones after exposure and can lead to death (30 ppm)
- Large release could impact hundreds of thousands of residents
- Torrance Refinery used Modified HF (MHF)
- No HF was released in the Torrance and Superior incidents



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- Two MHF tanks approximately 80 feet south of the ESP
- Temporary scaffolding around tanks at time of incident
- Outside of ExxonMobil's minimum equipment spacing requirement









Another nearby vessel hit by explosion debris (not MHF)

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Perimeter laser detection system compromised



HF Near-Miss: Superior



HF tank was 50 feet closer to the explosion than the punctured asphalt tank (HF tank was not compromised) ^{26th California United}





HF Near-Miss: Superior

- Post-incident, Superior Refinery implemented additional HF mitigation, including:
 - Rapid acid transfer system
 - Enhancements to existing water mitigation system
 - Additions and modifications of other safety features
- Providing assistance to the Douglas County Emergency Management Department on its emergency community alert system and community evacuation plan, including interactive drills

Source: <u>Cenovus</u>

Philadelphia Energy Solutions (PES)



June 21, 2019 Piping in HF alkylation unit ruptured Vapor cloud ignited, fire led to other explosions

HF response:

- Approximately 5,000 lbs of HF released (no off-site impacts reported due to HF release)
- Rapid acid de-inventory: 339,000 lbs of HF drained
- Explosion compromised control system to remotely operate the water spray HF mitigation system

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Philadelphia Energy Solutions (PES)

"[A]ctive" safeguards—or safeguards that require a person or technology to trigger their activation—have the potential to fail in major incidents involving fire or explosions.
Refiners operating HF alkylation units need to improve the availability and reliability of active safeguards during incidents involving fire and explosions.

From CSB report: *Fire and Explosions at Philadelphia Energy Solutions Refinery Hydrofluoric Acid Alkylation Unit* (October 2022)

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Open CSB Recommendations for HF

- **To EPA:** "Develop a program that prioritizes and emphasizes inspections of refinery HF alkylation units" and "FCC units in refineries that operate HF alkylation units"
- **To API:** "Update API RP 751 Safe Operation of Hydrofluoric Acid Alkylation Units"
- To EPA: "Revise 40 C.F.R. Part 68 (EPA Risk Management Plan) to require new and existing petroleum refineries with HF alkylation units to conduct a safer technology and alternatives analysis (STAA) and to evaluate the practicability of any inherently safer technology (IST) identified"
- **To EPA:** Initiate prioritization and, as applicable, risk evaluation of HF under the Toxic Substances Control Act



California PSM Reform

- California updated its PSM regulation for petroleum refineries (Section 5189.1) in 2017 in response to previous regulatory gaps the CSB identified:
 - <u>Chevron Refinery Fire (2012)</u>
 - <u>Tesoro Anacortes Refinery Fatal Explosion and Fire (2010)</u>
- Intended to make California petroleum refineries safer, including:
 - Hierarchy of Hazard Controls Analysis
 - Process Hazard Analysis that documents the effectiveness of safeguards
 - Damage Mechanism Review
 - Employee Participation, Human Factors, Process Safety Culture
 - Assessment, and others





Open Discussion

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