



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 2024-84

Date: June 20, 2024

On June 19, 2024, the Board approved Notation Item 2024-84, thereby designating Recommendation 2021-01-I-TX-R3, to Wacker Polysilicon, from the Wacker Polysilicon Chemical Release investigation (2021-01-I-TN), with the status of Closed – Acceptable Action.

Voting Summary – Notation Item 2024-84

Disposition: APPROVED

Disposition date: June 19, 2024

	Approve	Disapprove	Calendar	Not Participating	Date
S. Johnson	X				6/17/2024
S. Owens	X				6/19/2024
C. Sandoval	X				6/17/2024



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

Report:	Wacker Polysilicon Chemical Release
Recommendation Number:	2021-01-I-TN-R3
Date Issued:	June 15, 2023
Recipient:	Wacker Polysilicon
New Status:	Closed – Acceptable Action
Date of Status Change:	June 19, 2024

Recommendation Text:

Develop detailed maintenance procedures for torquing activities which:

- a. Clearly communicate differing equipment torque specifications, such as those for bolts installed at PTFE-to-PTFE and PTFE-to-graphite connections through visual means such as annotated photographs, signage, physical differentiation, and other methods, as appropriate;*
- b. Include procedural requirements for all torquing activities conducted on equipment containing hazardous material to perform an engineering and risk analysis and implement safeguards as a result of the risk analysis, per American Society of Mechanical Engineers (ASME) PCC-1-2019 Guidelines for Pressure Boundary Bolted Flange Joint Assembly and ANSI/ASSP Z244.1-2016 The Control of Hazardous Energy Lockout, Tagout and Alternative Methods;*
- c. Ensure that terms such as “hot torque” are clearly defined and that employees and contractors are trained on these terms; and*
- d. Ensure that procedures and training conform to the mechanical integrity requirements of the Process Safety Management (PSM) standard found in 29 CFR 1910.119(j) and the Risk Management Program (RMP) rule found in 40 CFR 68.73.*

Board Status Change Decision:

A. Rationale for Recommendation

On November 13, 2020, a graphite heat exchanger cracked during maintenance activities, releasing anhydrous hydrogen chloride at the Wacker Polysilicon facility in Charleston, Tennessee. The incident occurred on the fifth floor of an equipment access structure when a contractor applied excessive torque to flange bolts on the heat exchanger’s discharge pipe.

Seven workers from two contracted companies were in close proximity to the release. The location of the release prevented the workers from accessing the platform’s single means of egress. While attempting to escape by climbing down piping on the side of the structure, three of

the workers fell to the ground, fatally injuring one and seriously injuring the other two. The other four workers remained in place until the release ended. One of these four workers sustained chemical burns from the release due to a rip in their personal protective equipment (PPE). The remaining three workers were uninjured.

The U.S. Chemical Safety and Hazard Investigation Board (CSB) investigated the incident and found several safety issues including ineffective written procedures, control of hazardous energy, and management of hazards during simultaneous operations (SIMOPs), as well as an insufficient means of egress from the platform. As a result of these findings, the CSB issued four recommendations to Wacker Polysilicon. This status change summary addresses CSB Recommendation No. 2021-01-I-TN-R3.

B. Response to the Recommendation

Wacker Polysilicon notified the CSB that procedures made in accordance with the requirements of the recommendation have been developed and implemented. Additionally, Wacker has trained their workers on these updated procedures. Upon review of the information provided, the CSB concluded that Wacker's actions satisfy all elements of the recommendation.

C. Board Analysis and Decision

Based upon the information above, the Board voted to change CSB Recommendation No. 2021-01-I-TN-R3 to: "Closed – Acceptable Action."