



U.S. Chemical Safety and Hazard Investigation Board

OFFICE OF GENERAL COUNSEL

Memorandum

To: Board Members

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

Cc: Amanda Johnson
Adam Henson
Leadership Team

Subject: Board Action Report – Notation Item 2024-93

Date: August 19, 2024

On August 15, 2024, the Board approved Notation Item 2024-93, thereby designating Recommendation 2020-02-I-TX-R5, to the American Chemistry Council (ACC), from the TPC Port Neches (TPC) Explosions and Fire investigation (2020-02-I-TX), with the status of Closed – Acceptable Alternative Action.

Voting Summary – Notation Item 2024-93

Disposition: APPROVED

Disposition date: August 15, 2024

	Approve	Disapprove	Calendar	Not Participating	Date
S. Johnson	X				8/15/2024
S. Owens	X				8/15/2024
C. Sandoval	X				8/15/2024



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

Report:	TPC Port Neches Explosions and Fire
Recommendation Number:	2020-02-I-TX-R5
Date Issued:	December 19, 2022
Recipient:	American Chemistry Council (ACC)
New Status:	Closed – Acceptable Alternative Action
Date of Status Change:	August 15, 2024

Recommendation Text:

Revise the Butadiene Product Stewardship Guidance Manual to provide guidance on a methodology to help identify what should be considered excessive or dangerous amounts of popcorn polymer in a unit. Provide mitigation strategies that describe the actions that owner/operators should take during those polymer excursions to control or eliminate the popcorn polymer to reduce the likelihood of popcorn polymer-induced process loss of containment.

Board Status Change Decision:

A. Rationale for Recommendation

On the morning of November 27, 2019, a dead leg between the Final Fractionator A and the manual isolation valve upstream of an offline pump in the TPC Group Port Neches Operations facility's butadiene unit ruptured. As a result of the rupture, approximately 6,000 gallons of liquid, primarily butadiene, was released. The liquid butadiene vaporized upon release forming a flammable vapor cloud that ignited moments later causing multiple fires and explosions. After the initial fires were contained, smaller fires burned for more than one month while isolation efforts were underway.

During the initial explosion two TPC Group employees and a security contractor suffered non-life-threatening injuries. Jefferson County officials reported that five additional minor injuries were suffered by residents of the community. Additionally, the blast damaged nearby homes and buildings and was reportedly felt as far away as 30 miles from the facility. County officials declared a state of disaster and multiple shelter-in-place and evacuation orders were issued.

As a result of the incident, the butadiene unit was completely destroyed and butadiene production operations ceased indefinitely. The incident caused \$450 million in on-site property damage, and an additional \$153 million in off-site property damage. The facility has since been transitioned to a "terminal and services" operation and on June 1, 2022, TPC Group filed for Chapter 11 bankruptcy.

The U.S. Chemical Safety and Hazard Investigation Board (CSB) investigated the incident and found several safety issues including failures in dead leg identification and control, process

hazard analysis action item implementation, control and prevention of popcorn polymer, and providing remotely operated emergency isolation valves. As a result of these findings, the CSB issued two recommendations to the American Chemistry Council (ACC). This status change summary addresses CSB Recommendation No. 2020-02-I-TX-R5.

B. Response to the Recommendation

In June of 2024 the ACC published an updated version of the Butadiene Product Stewardship Guidance Manual. The updated version of the manual contains information acknowledging the complexity of managing popcorn polymer and directing facilities to reference their specific process safety documents where they exist. The new information also calls on facilities to develop and implement process safety documents to prevent and control popcorn polymer formation if they don't already have them.

C. Board Analysis and Decision

The updates to the manual do not specifically address an established limit on the amount of popcorn polymer within a unit that should be considered excessive or dangerous. Previous editions of the manual advise levels of oxygen in the vapor space and peroxides in the liquid phase, which should be cause for concern. Previous editions of the manual also provide mitigation strategies that owner/operators should take during popcorn polymer excursions as well as means to prevent such excursions. The extent to which popcorn polymer in a butadiene process is excessive and/or hazardous varies based on the conditions of the facility. As such, the ACC's guidance for facilities to follow or develop and implement, where necessary, facility specific procedures to prevent and control popcorn polymer is appropriate.

Although the updated manual does not address the specifics of the recommendation, the revised *Butadiene Product Stewardship Guidance Manual* meets the intent of the recommendation and will improve safety at facilities handling butadiene. Based upon the information above, the Board voted to change CSB Recommendation No. 2020-02-I-TX-R5 to: "Closed – Acceptable Alternative Action."