

U.S. Chemical Safety and Hazard Investigation Board

OFFICE OF GENERAL COUNSEL

Memorandum

To: **Board Members**

From: Christopher M. Lyon

Acting General Counsel

Michael Lyon Date: 2024.11.18 14:31:37

Christopher Digitally signed by Christopher Michael Lyon

Cc: Amanda Johnson

> Adam Henson Leadership Team

Board Action Report – Notation Item 2025-8 Subject:

Date: November 18, 2024

On November 18, 2024, the Board approved Notation Item 2025-8, thereby designating Recommendation 2013-3-I-LA-R4, to the American Petroleum Institute (API), from the Williams Olefins Plant Explosion and Fire investigation (2013-3-I-LA), with the status of Closed - Acceptable Alternative Action.

Voting Summary – Notation Item 2025-8

Disposition: APPROVED

Disposition date: November 18, 2024

	Approve	Disapprove	Calendar Not Participating	Date
S. Johnson	X			11/18/2024
S. Owens	X			11/18/2024
C. Sandoval	X			11/18/2024



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

Report:	Williams Olefins Plant Explosion and Fire		
Recommendation Number:	2013-3-I-LA-R4		
Date Issued:	October 19, 2016		
Recipient:	American Petroleum Institute (API)		
New Status:	Closed – Acceptable Alternative Action		
Date of Status Change:	November 18, 2024		

Recommendation Text:

To help prevent future major incidents such as a rupture of a pressure vessel in a special operating status, strengthen API Standard 521, Pressure-relieving and Depressuring Systems, by defining the various types of equipment operating statuses. Include definitions for "standby" and "out-of-service." Specify pressure relief requirements for each type of equipment operating status.

Board Status Change Decision:

A. Rationale for Recommendation

On June 13, 2013, a fire and explosion occurred at the Williams Olefins, Inc. (Williams), Plant located in Geismar, Louisiana, when a reboiler, which supplied heat to a propylene fractionator column, ruptured due to an over pressurization event while it was isolated from its pressure relief device. Two Williams employees were killed and 167 employees were injured. The 167 injured employees consisted of three Williams employees and 164 contractor employees.

As a part of its investigation, the U.S. Chemical Safety and Hazard Investigation Board (CSB) examined the plant's process safety management program as well as the plant's process safety culture. The CSB found significant weaknesses in the Williams process safety culture that were demonstrated by a series of deficiencies in implementing the plant's process safety management programs as well as weaknesses in the written programs themselves. These deficiencies included: (1) poorly conducted Management of Change and Pre-Startup Safety Reviews; (2) ineffective safeguard selections, insufficient safeguard evaluation requirements, and poor implementation of action items in Process Hazard Analyses; (3) inadequate focus on development and maintenance of operating procedures; and (4) uncontrolled field equipment manipulations without a hazards assessment prior to the development of a procedure. The CSB also noted areas of improvement for industry guidance related to pressure-relieving and depressing systems.

Consequently, the CSB Board issued two recommendations to the API to revise it standards pertaining to pressure-relieving and depressuring systems (CSB Recommendation Nos. 2013-3-I-LA-R4 and 2013-3-I-LA-R5). This status change summary addresses CSB Recommendation No. 2013-3-I-LA-R4.

B. Response to the Recommendation

The API published the 7th Edition of API 521, *Pressure-relieving and Depressuring Systems* (API 521). Section 4.1 of API 521 calls attention to the need for owner/users to define pressure relieving requirements for all modes of operation including "standby" and "out of service". The new language of the standard guides owner/users to consider their isolation practices and apply them consistently across all modes of operation.

While this does not define these modes of operation or specify the pressure-relieving requirement necessary for these modes of operation it does address the recommendation. The API's actions have accomplished the objective of the recommendation by calling the attention of owner/users to the importance of considering different modes of operation when making decisions about pressure-relieving systems.

C. Board Analysis and Decision

Based upon the information above, the Board voted to change the status of CSB Recommendation No. 2013-3-I-LA-R4 to: "Closed – Acceptable Alternative Action."