

June 21, 2019



By Email

Attn: Dr. Kristen Kulinowski
Interim Executive Authority
U.S. Chemical Safety and Hazard Investigation Board
1750 Pennsylvania Avenue, NW Suite 910
Washington, DC 20006
public@csb.gov

Re: Explosion at the Philadelphia Energy Solutions Refinery Complex

Dear Dr. Kulinowski:

Clean Air Council (the “Council”) requests that the U.S. Chemical Safety and Hazard Investigation Board (CSB) exercise its authority to independently investigate the explosion and fires that took place at the Philadelphia Energy Solutions (PES) refinery complex in Philadelphia.

The first fire took place on June 10, 2019 near the 868 Fluidized Catalytic Cracking Unit, which was then shut down and required hours of flaring as a result. The second incident took place around 4:00 a.m. in what reports indicate was the hydrogen fluoride alkylation unit at the refinery. A massive fireball and a series of explosions resulted, rattling houses miles away in New Jersey and causing a large fire that took hours to contain and which has not yet been put out as of the latest available information. No reports are currently indicating that hydrogen fluoride was released, but this appears to have been a troubling near miss.

The CSB has already exercised its authority to investigate the ExxonMobil Refinery Explosion in Torrance, California, where a similar explosion took place at a modified hydrofluoric acid alkylation unit took place. *See* <https://www.csb.gov/exxonmobil-refinery-explosion/>. Likewise, there is an ongoing CSB investigation into the 2017 Husky Refinery fire, which led to an evacuation zone extending ten miles from the refinery. *See* <https://www.csb.gov/husky-energy-refinery-explosion-and-fire/>. Nearly two million people live within ten miles of the PES refinery.

As the CSB highlighted in an April 24, 2019 letter calling on the U.S. EPA to update its hydrogen fluoride study, up-to-date information will help improve risk management plans and assist with consideration and implementation of viable, and inherently safer alternatives, to prevent catastrophic releases of hydrogen fluoride, an enormously dangerous and toxic substance. This information is important for community residents near the PES refinery and all others where facilities should now be fully implementing the Chemical Disaster Rule (2017 Amendments to the Risk Management Program) – as well as to EPA who should be enforcing and not considering rolling back those protections.

Philadelphia and surrounding communities appear to have narrowly dodged a catastrophe this morning. We need to know why this happened and what can be done about it.

Accordingly, we respectfully and urgently request the CSB to conduct an investigation into today's explosion and the fire that took place just two weeks ago.

Sincerely,



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The Council is a non-profit environmental and health organization headquartered at 135 South 19th Street, Suite 300, Philadelphia, Pennsylvania 19103. For more than 50 years, the Council has fought to improve air quality and the environment across Pennsylvania. The Council has members throughout Pennsylvania who support its mission to protect everyone's right to a healthy environment.