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September 18, 2012

Ms. Mary Kay Nye
Process Safety Supervisor
Shell Oil Products U.S. Martinez Refinery
3485 Pacheco Blvd.
P.O. Box 711
Martinez, CA 94553

Dear Ms. Nye:

Subject: Comments on 30-Day Incident Report and RCA – Flexicoker Debutanizer PSV Release (IR#12-08-14-01)

Contra Costa Hazardous Materials Programs (CCHMP) received the 30-day incident report for the Flexicoker Gas Plant Debutanizer PSV release on September 14, 2012. This incident was classified as a Level 2 incident in the County's Community Warning System requiring a Root Cause Analysis (RCA) type of investigation. After reviewing the 30-day report and RCA, CCHMP has the following comments.

1. Page 3 of the report identifies that the root cause of the leak was, "the deterioration of the Viton® seat in SVJ-197." CCHMP believes this to be more of an initiating cause. Root causes should be linked to management system failures. Based on the maintenance timeline presented in the report that identified Viton® was acceptable in the past, perhaps something was changed or operational issues were involved that contributed or exacerbated Viton® deterioration. A difficult question to answer that could lead towards discovering the root cause could be, going back in time before the release, how could Shell have known Viton® could be deteriorated so quickly? Or to put another way, what should Shell have known or done to minimize or prevent such deterioration to Viton®? Questions like these could lead to evaluating the adequacy of programs like MOC, PSI, and/or mechanical integrity.
2. Page 3 of the investigation report identifies that the cause and effect diagram is Figure 1 instead of Figure 2.
3. Since the latent conditions checklist used was not designed to be included as part of the public incident investigation report, it is suggested that the reference to Table 1 be removed on page 3 of the report.



CCHMP expects that responses to the above comment will be submitted by October 2, 2012. Please contact me at 925-335-3237 if you have any questions.

Sincerely,

Original signed by

Michael Dossey
Accidental Release Prevention Engineer