

Contra Costa Health Hazardous Materials Programs (CCHHMP)  
Final Findings from December 2023 Unannounced Inspection at PBF Martinez  
Refining Company

EXECUTIVE SUMMARY

February 26, 2024

**Overview:**

CCHHMP (Contra Costa Health Hazardous Materials Program) conducted an Unannounced Inspection (UI) at PBF Martinez Refining Company (MRC) from December 26, 2023 through January 29, 2024. The goal of this inspection was to evaluate the refinery's compliance with select process safety programs due to process safety concerns from incidents over the last year and anonymous complaints. As a result, CCHHMP decided to conduct the UI in advance of the triennial California Accidental Release Prevention (CalARP) Program and county Industrial Safety Ordinance (ISO) audit scheduled to start in January 2024. The programs being reviewed during the UI include Mechanical Integrity, Management of Change, Pre-Startup Safety Review, Incident Investigations, and Stop Work Authority (Management Systems). The five safety programs were chosen as the subject of the unannounced inspection because of their relation to the frequency and type of incidents that had occurred at the refinery over the previous year. These programs represent only 5 of the 24 process safety programs required by the California Accidental Release Prevention Program and the County's Industrial Safety Ordinance, a full review of these process safety programs will occur during the triennial audit. The UI review of the 5 safety programs did not identify any areas needing immediate or short-term action. The full review of all 24 programs will take place during the normal triennial audit.

CCHHMP's UI team was comprised of 4 Accidental Release Prevention Engineers full time for the duration of the UI with 1 Hazardous Materials Specialist involved on an as needed basis.

CCHHMP conducted interviews with 15 Subject Matter Experts (SMEs), 12 Operators, 4 Contractors, and 2 Maintenance employees. CCHHMP interviewed 4 members of the refinery leadership team. CCHHMP interviewed Operators covering all four shifts at various control rooms and field shelters at the refinery. Additional interviews took place during field walks with Operators, Contractors, and Maintenance personnel. Although union representation was available for all interviews, many operators declined to be interviewed. The hesitancy of operators to engage in interviews can be partly attributed to their experiences and

observations from interactions with different agencies during inquiries related to the November 2022 spent catalyst release. It is not a regulatory requirement for operators to speak to CCHHMP during audits or inspections, however, CCHHMP was not able to hit the targeted number of interviews due to this barrier.

During the course of the UI, CCHHMP performed field walks of equipment, conducted interviews, and reviewed various policies, procedures, technical reports, and databases related to the identified process safety programs. More details can be found in the final [full inspection report](#).

**Recommendation Summary:**

The table below summarizes the information reviewed and recommendations developed from this Unannounced Inspection. Recommendations developed by CCHHMP fall under one of two categories: Regulatory Deficiency and Best Practice Recommendation. A Regulatory Deficiency recommendation is required to be implemented to comply with either the California Accidental Release (CalARP) program or the Industrial Safety Ordinance (ISO). A Best Practice recommendation is a recommendation by CCHHMP that would improve the safety program element but is not required for compliance. CCHHMP identified two best practice recommendations.

**Mechanical Integrity:**

<u>Regulatory Requirement</u>	<u>Items Reviewed</u>	<u>Recommendations</u>
Inspection and Testing:  California Code of Regulations (CCR), Title 19, Section 2762.5(b)(2)  Contra Costa Industrial Safety Ordinance 450-8.016 (a)(5)(D)	Subject Matter Expert interviews  Overdue Inspection List  Deferral Process for Inspections and list of deferred maintenance items.  Preventative Maintenance List (total of 2240 items)  Database of safety instrument inspections  Metrics associated with Inspection and Testing of Equipment	Regulatory: None  Best Practice: None

<p>Corrective Maintenance and Repairs:</p> <p>CCR, Title 19, Section 2762.5(c)</p> <p>Contra Costa Industrial Safety Ordinance 450-8.016 (a)(5)(E)</p>	<p>Policies for corrective maintenance repairs</p> <p>Policies for Temporary repairs</p> <p>Current list of all temporary repairs and supporting documentation</p>	<p>Regulatory: None</p> <p>Best Practice:</p> <ul style="list-style-type: none"> <li>• “Planned Removal Date” listed on the D(F)-10 form should reflect the refinery’s actual planned removal opportunity.</li> <li>• Document the design life of the temporary repair and the next review date on the D(F)-10 form.</li> </ul>
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**Management of Change (MOC) & Pre-Startup Safety Review (PSSR):**

<u>Regulatory Requirement</u>	<u>Items Reviewed</u>	<u>Recommendations</u>
<p>Management of Change:</p> <p>CCR, Title 19, Section 2762.6</p> <p>Contra Costa County Industrial Safety Ordinance Section 450-8.016(a)(6)</p>	<p>MOC Policies</p> <p>Employee Interviews</p> <p>14 completed MOCs and supporting documentation</p> <p>Field verification of 6 of the 14 MOCs</p>	<p>Regulatory: None</p> <p>Best Practice: None</p>

<p>Pre-Startup Safety Review:</p> <p>CCR, Title 19, Section 2762.7</p> <p>Contra Costa County Industrial Safety Ordinance Section 450-8.016(a)(7)</p>	<p>PSSR Policies</p> <p>14 completed PSSRs and supporting documentation</p> <p>Field verification of 6 of the 14 PSSRs</p> <p>Employee Interviews</p>	<p>Regulatory: None</p> <p>Best Practice: None</p>
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**Incident Investigations:**

<u>Regulatory Requirement</u>	<u>Items Reviewed</u>	<u>Recommendations</u>
<p>Incident Reporting and Investigation:</p> <p>CCR, Title 19, Section 2762.9</p> <p>Contra Costa County Industrial Safety Ordinance Sections 450-8.016(a)(9) and 450-8.016(c)</p>	<p>Incident Investigation Policies</p> <p>85 Process Safety Incidents (July 2023-Present)</p> <p>1 Major Chemical Accident or Release (12/15/23 event)</p> <p>Incident Investigation reports for 11 incidents related to coking operations</p> <p>Employee Interviews</p>	<p>Regulatory: None</p> <p>Best Practice: None</p>

**Stop Work Authority and Reporting of Hazards:**

<u>Regulatory Requirement</u>	<u>Items Reviewed</u>	<u>Recommendations</u>
Stop Work and Hazard Reporting:  CCR, Title 19, 2762.16(f)(1) and (2)	Employee Interviews  Policies  Goal Zero Safety Program  Safety Concern Reporting (Focus) Database  Stop Work Documentation (2 instances)	Regulatory: None  Best Practice: None

**Next Steps:**

The Unannounced Inspection (UI) has concluded. CCHHMP began the California Accidental Release Prevention (CalARP) Program and County Industrial Safety Ordinance (ISO) audit on January 30, 2024, which will last approximately 5 weeks. This audit will review all 24 process safety program elements required by CalARP and ISO and will review the status of action items from the 2021 CCHHMP CalARP/ISO audit. Once the final audit report is complete it will be posted on [www.cchealth.org/hazmat](http://www.cchealth.org/hazmat) and there will be a 45-day public comment period and meeting held. CCHHMP continues work with the Oversight Committee, information can be found at [www.cchealth.org/hazmat/mrc](http://www.cchealth.org/hazmat/mrc).