

PETROLEUM ENFORCEMENT LIAISON GROUP

ACTION NOTES OF 24th PELG MEETING HELD ON THURSDAY 22 JANUARY 2004

Mr Ted Beckley (Acting Chair)	COSLA
Mr Stewart McEwen	HSE - CFPD
Mr Peter Roberts	HSE - CFPD
Mr John Hazeldean	HSE - HID
Mr Roger Marris	North East
Mr Harry Eggar	North West
Ms Alison Edwards	LACORS
Mr Andy Berry	London
Mr Rob Tunnicliff	Midlands
Mr Michael Webber	South West
Mr Phil Monger	PRA

Welcome, introduction and apologies

- 1 Ted Beckley (Acting Chair) welcomed members to the 24th PELG meeting.
- 2 Apologies were received from: Phil Thomas, Huw Morgan, Ian Hillier, Steve Quick, Rory Hennessy, Chris Hunt, Steve Gray, David Pumford, John Worth, and Gareth Broughton. Harry Eggar was substituting for David Scott.

Notes of the 23rd PELG meeting

- 3 No comments were made about the meeting notes.

Action notes

- 4 The following action notes were carried forward from the previous meeting:
 - a. Competence of petroleum officers – Alison Edwards and Stewart McEwen still need to progress this subject. One important point is to clarify if HSWA Section 18 guidance applies to officers employed by county councils and fire authorities. Stewart will contact Alison in due course.

Action: HSE & LACORS

- b. LACORS revision of licence conditions – the final document was published in late December. PLAs will now be introducing the revised conditions when licences come up for renewal. This item can be discharged.

Item discharged

- c. Petroleum LACS – the PETELs have now appeared on the website. This item can be discharged.

Item discharged

- d. LPG nozzles and cold burns – some regional representatives reported a fairly large number of incidents. HSE still need take this matter forward, both considering HSWA Section 6 issues and whether it is a DSEAR or COSHH subject.

Action: HSE

- e. Communication difficulties with forecourt staff - HSE has made internal enquiries about possible conflicts with equal opportunities legislation, so far without response. Members will be informed of the outcome in due course.

Action: HSE

- f. Draft PETEL on vapour retention devices etc – has been finalised and distributed to regional contacts for cascading. It will appear on the website shortly.

Action: HSE

- g. Draft PETEL on fuel retrievers and airfield bowsers - has been finalised, distributed to regional contacts and is on the website. This item can be discharged

Item discharged

- h. Draft PETEL on LAPS – following comments received, the draft will be revised to include contact points for the PLAs. The Lancashire CC / Fairbanks entry will be deleted (HSE will write to Lancashire about this). HSE will finalise the draft and arrange distribution

Action: HSE

- i. HSE FOD Operational circular (raised under ‘any other business’) – on re-reading the circular, it is, in fact correct. PLA enforcement is restricted to petrol filling stations - DSEAR Schedule 6 para 5(3)(d). This item can be discharged.

Item discharged

Main agenda

Guidance for site operators

5 Following on from the revision of licence conditions, there is a need for comprehensive guidance aimed at site operators concerning the day-to-day operation of petrol filling stations. Roger Marris has prepared suitable guidance for use within West Yorkshire. He has continued to update the document. He has agreed to allow it to form the basis of a national guidance document. However, members of PELG and the Petroleum Working Group should be given the opportunity to comment on it before it is formally endorsed.

6 He agreed to email the document to HSE who will then arrange for copies to be printed as hard copy for distribution to PELG and PWG members, allowing them perhaps 3 weeks to comment. Amendments could then be considered at the next PELG Tech meeting with a view to final clearance by the next PELG meeting.

Action: Roger Marris & HSE

Autogas – recent incidents etc.

7 Peter Roberts provided some background on the recently issued PETEL 65/54. This gave details of two recent incidents at Autogas sites. Investigations were continuing into both incidents and a small working group had been established to draft a PETEL, which be looking particularly at installation and ducting issues. HSE will update members in due course.

Action: HSE

Autogas – dispensing into cylinders

8 A new type of LPG cylinder is being marketed, which is lightweight and capable of being refilled from an Autogas dispenser. HSE will be drafting guidance on the legal issues that site operators and PLOs will need to consider. In the interim as a minimum HSE considers that this activity would need to be subject to a robust risk assessment by the operator. HSE will update members in due course.

Action: HSE

Autogas – LPGA codes of practice

9 HSE had recently contacted LPGA to request that PELG should be represented on any working groups concerning developing Autogas codes of practice. LPGA had explained that their codes of practice are not produced through a working group procedure. An initial draft is produced internally and is then sent out to relevant parties for comment. They have an HSE contact person – Penny Bradley, who attended the last PELG Tech meeting. She will ensure that any draft codes of practice relating to Autogas are passed to Stewart McEwen in his capacity as Chair of PELG Tech. This item can be discharged.

Item discharged

Review of PETEL 65/51 (dispensing control measures)

10 A number of questions have arisen since the introduction of 65/51 concerning the interpretation of various parts of the guidance, in particular the use of CCTV and the measures site operators need to take to ensure the safety of members of the public at unattended sites. John Hazeldean has set up a small working group to consider these problems – he will report back in due course.

Action: John Hazeldean

Vapour hoses – possible problems with valves

11 John Hazeldean explained that a delivery company had recently fitted poppet valves to their tanker vapour recovery hoses. As the site vapour recovery point was

also fitted with a poppet valve, this was sometimes causing problems with deliveries – ‘locking-up’ the vapour system or causing a release of vapour on the site. It was agreed that John should contact the IP Tanker Panel (Mark Scanlon) to discuss the problem.

Action: John Hazeldean

Report back from PELG Technical sub-committee

12 Most of the issues discussed at the last PELG Tech meeting have been raised as other items on the agenda. However, one point still to be cleared is a final outcome on the electrical certificates issue. Phil Monger confirmed that PRA had distributed to all their members an example of a certificate, which seems to be generally acceptable and is solving the problem, at least in the short-term. However, he still wanted HSE to try to permanently resolve the issue with NICEIC. Stewart McEwen agreed to take the matter forward.

Action: HSE

Any other business

13 Five topics were raised under this heading:

- Interpretation of Regulation 7(4) of DSEAR (verification of overall explosion safety) – who is ultimately responsible if the verification is defective? John Hazeldean agreed to produce some guidance on this point.

Action: John Hazeldean

- Deprogramming of emergency phones – there is evidence of an emerging problem with emergency phones - when tested some appear to have lost their automatic programming. HSE will contact members outside the meeting to gather further information.

Action: HSE

- Signage – did the requirements of DSEAR involve any change to signage on sites? HSE said that the ‘EX’ sign did not need to be physically applied to filling station sites, but hazardous atmospheres should still be shown on site plans. In general, signage should conform to what is recommended in the Blue Book.
- PRA safe unloading self-learning training package - Phil Monger confirmed that this has now been made available to PRA members. It is also available to non-members and is suitable for the training of tanker drivers.
- PETEL 65/39 mentions a video on thermite reactions. HSE has received an enquiry from the USA about the availability of the video. HSE agreed to take this matter forward.

Action: HSE

Dates of future meetings

14 The dates for the next meetings have already been agreed:

- 20 May 2004
- 23 September 2004