

PETROLEUM ENFORCEMENT LIAISON GROUP

REVISED ACTION NOTES OF THE 29th PELG MEETING HELD ON THURSDAY 7 JULY 2005

Allan Davies (Chair)	HSE - LAU
Peter Roberts (Secretary)	HSE - CFPD
John Hazeldean	HSE - HID
Ted Beckley	COSLA
Michael Webber	South West
Rob Tunnicliff	Midlands
Neil Simms	North West
Roger Marris	North East
Andy Berry	London
Steve Gray	Wales
Joanna Bradley	Environment Agency
Phil Monger	PRA

Welcome, introduction and apologies

- 1 Alan Davies welcomed members to the 29th PELG meeting.
- 2 Apologies were received from Alison Edwards (LACORS) and Rory Hennessey (AUKOI). Harry Eggar was unavailable; therefore Neil Simms represented the North West regional group. Some other members were unable to attend the meeting due to the explosions which took place in London on that day.
- 3 It was agreed that the meeting should continue, but should end at 1 00pm to give members adequate time to return home, as transport links were likely to be disrupted.

Notes of the 28th PELG meeting

- 4 There were no comments on the accuracy of the meeting notes.

Action notes of previous PELG meeting

- 5 The following action notes were carried forward from the previous meeting:
 - a. Vapour hoses – problems with valves – the Energy Institute have not been in touch. John Hazeldean and Roger Marris will continue to maintain a watching brief.

Action: John Hazeldean & Roger Marris

- b. Incident reporting: Brian Baker has sent to Peter Roberts the first quarter return for incidents in the SELCOG area. Peter will distribute this to members. The North West Group has started a similar system, using the

SELCOG return form. Peter Roberts contacted HSE Solicitors re Freedom of Information issues. Their view is to assume FoI will apply to statistics, unless a very good case can be made for confidentiality.

Action: Peter Roberts to distribute SELCOG return

c. Petrol extractor pumps – Andy Berry has not resolved the earthing issue - he will make further enquiries.

Action: Andy Berry

d. LPGA Autogas codes of practice – nothing to report at the moment.

Action: HSE (ongoing)

e. PETEL 65/58 - Peter Roberts has requested that HS(G)41 should be withdrawn – no response as yet – but it is confirmed that the document is out of print.

Action: Peter Roberts

f. Winter grade fuel – Alison Edwards has not reported any further developments.

Action: Alison Edwards

g. Refillable gas cylinders - Peter Roberts has spoken to colleagues about enforcement of DSEAR. In their view, allowing members of the public to refill cylinders at an Autogas facility would require a site operator to review the risk assessment – they would need to show that the activity could be performed safely, without significant risk to the site operator's staff and other members of the public. Given that the site operator would be unlikely to be able to judge the physical integrity of the cylinder, it is difficult to see how the activity can be performed without undue risk. Members agreed that, in PELG's view, PLAs should consider issuing a prohibition notice if their inspectors discover a site which allows members of the public to refill gas cylinders. This item can now be discharged.

Item discharged

h. Licence renewals – was due to be Agenda item 4, but covered here instead. Members had discussed the issues within their regions. It is clear that there was no real consensus on a way forward, other than that most PLAs would not support any scheme which reduced income from licence fees. Allan Davies mentioned that the outcome of the Hampton review would be likely to have an impact in this area as it covered licensing. He will keep members informed of any developments.

Action: Allan Davies

i. Review of standard licence conditions – see Agenda item 5.

j. LAPS – Allan Davies made members aware that DTI were taking an interest in the operation of LAPS and the Home Authorities schemes. He will keep members informed of any developments.

Action: Allan Davies

l. Progress on HSE/LA strategy – was due to Agenda item 6, but was discussed here instead. Allan Davies mentioned that the Extranet would begin trial running in September and that HSWA Section 18 standards were being developed. He will keep members informed of developments.

Action: Allan Davies

m. Autogas inspection checklist – see main agenda item 8.

n. Letter to Richard Wigfull – would be sent once the checklist has been finalised.

Action: Peter Roberts

o. Reports to LPGA – Peter Roberts has not been able to contact Jeff Watson. He will make further attempts.

Action: Peter Roberts

p. Screen wash dispensers – Joanna Bradley informed members that two sites were trialling the dispensers – one in the North East and one in the North West. The installation includes a 600-litre container for the screen wash liquid. Members will be informed of any developments.

Action: Joanna Bradley

q. Enforcement boundaries of DSEAR (maritime activities) – Peter Roberts and Brian Baker have discussed this issue. Peter’s final reply was as follows “The loading and unloading of a fuel barge would be covered by DSEAR up to the point where the dockside pipes connect to the barge's pipes. Anything on the barge's side is covered by maritime legislation, enforced by the Maritime and Coastguard Agency. Thus the storage of petrol on the barge, how it is navigated etc. are areas enforced by MCA while storage of petrol at the dockside and the dispensing arrangements into the barge are enforced by HSE or the PLA depending on the scale of the activity.” This item can now be discharged.

Item discharged

r. Record keeping (West Yorks) – Roger Marris has visited the site operator and is satisfied the system is adequate. This item can be discharged.

Item discharged

Main Agenda

Licence renewals etc

6 See paragraph 5 (h) above.

Review of standard licence conditions

7 The working party had drafted and issued a paper to members before the meeting. Allan Davies mentioned that LACORS had been in contact with him, stating they had no objections if the revised licence conditions were a PELG, rather than LACORS, document. It was pointed out to members that the status of any standard licence conditions document was advisory – it would have no formal legal status. Each PLA could use standard licence conditions if they wished but this was not mandatory.

8 A start was made on discussing the proposed new standard conditions – it was agreed that new condition 1.3 (definition of inspector) should be simplified and that condition 1.7 (licensed premises) should include ‘parts of a building’. Due to lack of time, members agreed to truncate discussions at this point. It was agreed that members should take away and discuss the contents of the document with their colleagues, passing written comments to Peter Roberts by 12 September. It was further agreed that the scheduled meeting for 6 October should concentrate on further discussions about the proposed revised licence conditions.

Action: Members

Progress on HSE / LA strategy

9 See paragraph 5(1) above.

Other agenda items

10 There was no time available to discuss in detail the remaining agenda items. However, it was agreed most could be cleared by correspondence:

- Revised PETEL on storing and dispensing petrol at airfields. Peter Roberts will progress this if time allows.
- Autogas checklist – Roger Marris has not received any further comments on the document. He will send the final version to Peter Roberts in order for it to be formalised as a PETEL.
- BP Autogas revised risk assessment – Peter Roberts issued hard copies of this document to members. Members are requested to send any comments to him by 5 August.

Any other business

11 No time was available to discuss any of the topics raised. Members are requested to re-send any items to Peter Roberts by 5 August and we will attempt to clear these topics by correspondence.

Date of next meeting

12 The next meeting has been arranged for 6 October 2005.