

# **HID CI Sub-COMAH Work Programme**

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- Long standing terminology
- Not everything outside COMAH
  - Sites with potential for significant incidents to drift off-site
- Need to define these sites:
  - In-line with Hampton Review
  - In-line with Enforcement Policy

## Aims of Programme

- Clarify understanding
- Clarify scope
- Sites to recognise & manage their risks
- Reduce incidents

## Why Sub-COMAH?



- Sub-COMAH Incidents
  - 1997 Hampshire - LPG Cylinder Storage Fire. Launched cylinders onto nearby supermarket car-park.
  - 2005 North West - Fire & explosion at aerosol filling plant. Poor plant design & operating procedures.
  - 2007 North West - Vapour cloud explosion & fire. Aerosol can shredding. Cloudburst response.

## What is Sub-COMAH?

- Sites falling below COMAH thresholds quantities **with**;
- Inventories of dangerous substances **and**;
- Where the worst foreseeable event would be comparable to that at a COMAH site.

# Dangerous Substances Inventories



| Dangerous Substance                              | Suggested Lower Limit Quantities Tonnes |
|--|---|
| Arsenic pentoxide, arsenic (V) acid and/or salts | 0.25                                    |
| Automotive petrol                                | 625                                     |
| Bromine  | 5                                       |
| Chlorine   | 2.5                                     |
| Ethylene Oxide                                   | 1.25                                    |
| Hydrogen   | 1.25                                    |
| Hydrogen chloride                                | 6.25                                    |
| Methanol   | 125                                     |
| Oxygen   | 50                                      |
| Sulphur trioxide                                 | 3.75                                    |
| Toluene diisocyanate                             | 2.5                                     |

# Quantity Thresholds



| Substance                                     | Threshold of COMAH LT Threshold          | Lower Limit Quantities Tonnes |
|---|--|-------------------------------|
| Named Dangerous Substances see detail         | 25%                                      | See previous slide            |
| Very Toxic                                    | 15%                                      | 0.75                          |
| Toxic   | 25%                                      | 12.5                          |
| Peroxides                                     | 25%                                      | 12.5                          |
| Other Oxidizers                               | 50%                                      | 25                            |
| Flammable                                     | 50%                                      | 2500                          |
| Highly Flammable note 3(b) (i)                | 25%                                      | 12.5t                         |
| Highly Flammable note 3(b) (ii)               | 25%                                      | 1250                          |
| Extremely Flammable                           | 10%                                      | 1                             |
| Aerosols storage - Aggregate quantity of EFLs | 50%                                      | See leaflet notes             |
| Chemical waste sites                          | Any quantity less than COMAH quantities. |                               |

# Example Sites



|  |  |
|--|--|
| LPG sites  | Aerosol manufacturing and storage sites  |
| Jetties  | Waste storage, transfer, treatment and recovery sites.   |
| Solvent recovery, supply and storage                 | Surface coatings: <ul style="list-style-type: none"><li>•Paints, varnishes, adhesives and printing inks/printers;</li><li>•Polymer factories;</li><li>•Fibreglass manufacturers and their suppliers</li></ul>                      |
| Dye manufactures                                     | Bio diesel plants  |
| Warehouse storage                                    | Pesticides   |
| Soap manufacturers (storage of sodium hydrosulphite) | Miscellaneous: <ul style="list-style-type: none"><li>• oxygen cylinder storage (300 – 400 cylinders) e.g. for salmon farms in Scotland.</li><li>• Liquefied refrigerant Gases.</li><li>• Combined heat and power plants.</li></ul> |

## Legislation for Sub-COMAH

- Not COMAH!
- Compliance is proportionate to the risks.
- Legislation includes, not exclusively:
  - Health and Safety at Work etc Act 1974
  - Management of Health & Safety at Work Regulations 1999
  - Dangerous Substances & Explosive Atmospheres Regulations 2002

- RCOs make first contact
  - Data cleanse
  - Visit
  - Letter/telephone call
- Inspectors follow up
  - Rate sites
- Use ratings to direct resource

- Identified approx 100 sub-COMAH sites
- Stakeholder events well received
- Enforcement
  - DSEAR
- Range of sites

## Current & Future Plans

- Initial communications throughout HSE.
- Programme of interventions
- Long term plan to continue.
- Communicate more widely
- Review detail annually.

# Any Questions?

Thank you