

HID CI Sub-COMAH Work Programme

Michelle Irwin
Major Hazards Operational Policy
HID CI4B

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

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