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Contents m

1. EXECUTIVE SUMMARY.....	3
2. GENERAL INTRODUCTION	3
3. ASSESSMENT BY HSA.....	4
3 1 . Intro .uct on .	4.
3 2. Metho .o ogy .	5.
3 3 . Key Assu . pt ons for Ana ys s .	5.
4. HSA COMMENT ON THE ESTABLISHMENTS OWN ASSESSMENT	8
5. CONCLUSIONS	8
APPENDIX 1 ROLE OF HSA (LEGAL FRAMEWORK)	9
APPENDIX 2 CRITERIA FOR LAND USE PLANNING	11
APPENDIX 3 – SOFTWARE, APPROACHES TO RISK ASSESSMENT, WEATHER	29
APPENDIX 4 - AMMONIUM NITRATE FERTILIZER (ANF) STORAGE PLANTS – THE HSA APPROACH TO TECHNICAL LUP ADVICE	32

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1 . Execut ve Su . ary .

This document has been prepared for Kilkenny County Council in respect of a request for planning permission in the vicinity of Grasslan Fertilizers (Kilkenny) Ltm. In formulating its decision, the authority considers potential major accidents in relation to the use of Nitrate fertilizer (NF), and the potential for impact of these on the surrounding people and the environment. The authority determines the risk zones in relation to potential major accidents in relation to these substances and sets out its decision concerning future development in those zones. m

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2 . Genera Intro .uction .

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This document contains the basis for the conclusions of the HSm ('the authority') with regard to the request for planning permission from Kilkenny County Council ('the planning authority') in relation to Grasslan Fertilizers (Kilkenny) Ltm ('the Establishment') at Malinstown, Co. Kilkenny. m

Based on the information supplied by the Establishment in its Notification, it is currently an upper-tier Sensitive site under the European Communities (Control of Major Accidents) Hazardous (Involving Dangerous Substances) Regulations, S.I. 74 of 2006 ('the regulations'). m Consequently the request falls within the remit of the authority to offer technical advice in relation to planning. m

The responsibility for safety on the site rests with the Operator. m

The operator is responsible for the appointment of competent persons to look after safety matters. m

The Establishment is required, under the above regulations, to demonstrate to the authority, at any time, that it has taken all necessary measures to prevent major accidents occurring and to limit the consequences of any such major accidents for man and the environment, and demonstrate that it has a safety management system in place. m

It is required to produce a Safety Report that will demonstrate it is taking all necessary measures for the prevention and mitigation of major accidents. This document is required to be made available to members of the public who request it. m

The operator is required to prepare an Internal Emergency plan for the establishment. m

The Local Competent authorities are required to prepare an External Emergency plan. m

The operator is required to regularly provide information to the public on the actions to be taken in the event of an emergency. m

The Establishment will be subject to regular inspection by Inspectors of appropriate technical expertise from the authority, and a proportion of these will be unannounced. m

The authority acknowledges the role of the Fire authority in relation to the general obligations to fire safety on the operator under the Fire Services Act of 1981 (as amended). m

In the event of any 'development' that could have significant repercussions for major accidents hazards, planning permission will be required. m

In developing its decision, the authority takes account of the requirements of the regulations as set out above, the commitment of the Establishment to comply with INDG 230 m especially in relation to the limitation of stack size and separation distance, to improve its storage of combustibles and confine them to a designated outside area, the removal of combustible material from the bulk materials store, the removal of the gas meter to a suitably safe area and its undertakings in relation to examination of the oil storage tanks and provision of appropriate bunding arrangements. The absence of sawdust due to the under floor heating system was also taken into account. m

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3 Assessment by HSA .

3.1 Introduction

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The functions of the authority are set out in appendix 1. One of its many functions relates to the provision of land use planning advice to planning authorities, which is a legal obligation under SI 74 of 2006. m

However there are a number of general exclusions contained in the regulations, the most relevant being as follows: m

m

The occurrence outside an establishment of - m

m

- the transport of dangerous substances by road, rail, internal waterways, sea or air m

m

- associated intermediate temporary storage m

m

- the transport of dangerous substances in pipelines and pumping stations. m

m

Then there are some activities, not listed as exclusions, which do not come within the scope of the regulations: m

-m The authority's advice does not deal with site selection or the suitability of one site over another. m

-m Activities relating to site development /construction are not within the remit of the authority in the context of the provision of Land-use planning advice. m

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The Establishment area .

The establishment is considered to be the area within the security fence footprint where the hazardous substances are processed and stored m

This decision was taken in respect of previous planning applications and has been retained following discussions between the authority and EM Commission officials and representatives of the other member states. m

m

m

Explanation of technical terms m

This report makes reference to specific terminology relating to consequence and risk assessment modelling. m

The way in which the authority develops its general technical advice and the criteria it uses are set out in appendix 2, where many of the technical issues relating to risk assessment are explained m

m

The hazards that were considered by the authority for the determination of risk posed by this establishment were: m

m

- Fire giving rise to toxic fumes of Nitrogen Dioxide, to the dangerous dose* m
end point of 56.6 ppb for a 30 minute exposure m
- Fire giving rise to toxic fumes of Nitric Oxide, to the dangerous dose end point of m
697 ppb for a 30 minute exposure m
- Explosion following a fire: overpressure effects to 140 mbar 2

2

* **dangerous dose** is defined as one where .

m

- There is severe distress to almost everyone. m

m

- substantial fraction requires medical attention. m

m

- Highly susceptible people might be killed m

m

See appendix 4 for the methodology approach of the authority to the provision of Licence in relation to establishments storing mobile Nitrate Fertilizer (mNF).

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m

3.2. Methodology.

The main consequence-modelling package used for analysis in this case was HST 6.4 (DNV Technica). It was also made use of LOH (mS Em) and DMS data supplied by Health & Safety Laboratory, mK. The risk calculation package used was Riskplot (ERM). Reference was also made to many relevant technical documents and these are listed in appendix 4.

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3.3. Key Assumptions for Analysis.

Upon examination of loss history databases and also through consultation, judgement and experience, the authority chose a selection of events, from across the span of the site to determine the potential overall off-site consequences (see appendix 4 for the approach of the authority to Licence in relation to sites storing mNF).

The key assumptions are outlined below for each stage of the risk assessment process.

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Inventory.

The Establishment made a formal notification of their dangerous substance inventory to the authority, shortly after the Regulations came into force. In summary:

m
m

	Dangerous Substances	Qty. on site	Seveso Cat.	Upper threshold
1	NPK Fertilizer 27:6:6 [mN 2067]	4000	Not a mobile substance	5000
2	NPK Fertilizer 30:6:0 [mN 2067]	4000	Not a mobile substance	5000
3	NS Fertilizer 27:3:7 [mN 2067]	4000	Not a mobile substance	5000

m

Table 1: Notified Inventory

m

This class of mobile Nitrate Fertilizers are covered by Note 2 of Schedule 1 (of the regulations):

This applies to straight ammonium nitrate based fertilisers and to ammonium nitrate based compound fertilisers in which the nitrogen content as a result of ammonium nitrate is

2

- more than 24,5% by weight, 2x2 points for mixtures of ammonium nitrate with dolomite, limestone and/or calcium carbonate with a purity of at least 90%,

2

- more than 215,75% by weight for mixtures of ammonium nitrate and ammonium sulphate,

2

- more than 28%⁽⁴⁾ by weight for mixtures of ammonium nitrate with 20% or more
of ammonium nitrate with a purity of at least 90%, 2

2 and which fulfil the requirements of Annex II of Directive 2008/76/EEC 2

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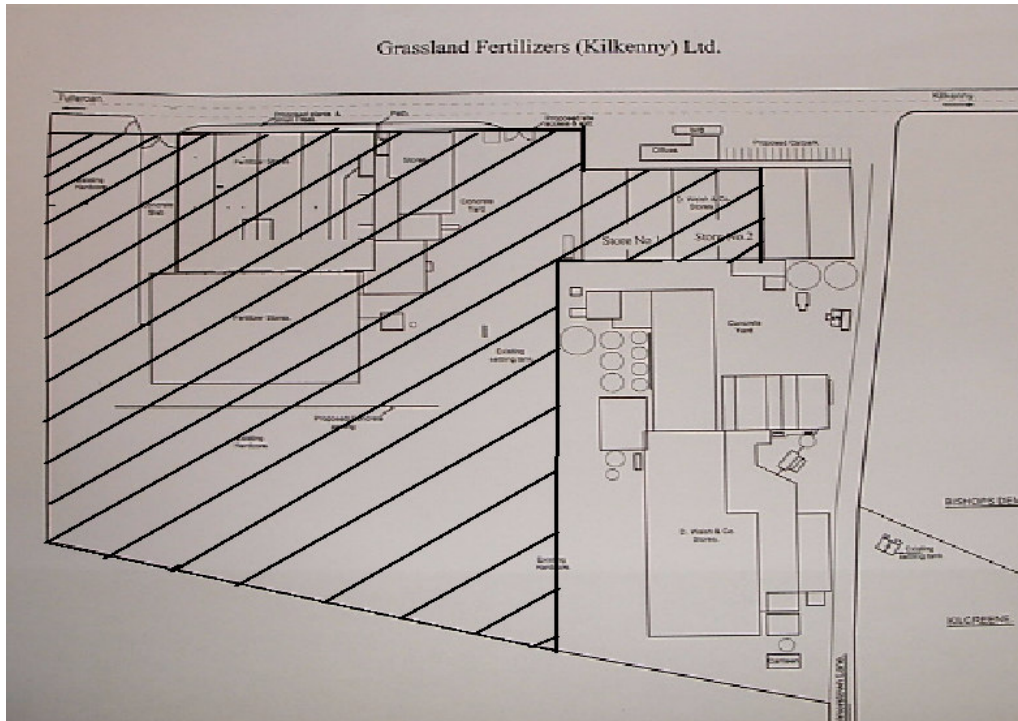


Fig 1 Layout of Establishment

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3.3.2 Scenarios Selected for Modeling

1. Fire in the vicinity of ammonium Nitrate Fertilizer leading to the decomposition products Nitric Oxide and Nitrogen Dioxide being released.

2. Explosion of molten/decomposing ammonium Nitrate.

3.3.3 Input Data for Risk Assessment

Atmospheric conditions were taken for the nearest weather station for which full information was available i.e. Kilkenny Met Station using 30 year data obtained from Met Éireann (see note 3 of appendix 3 for more detail on modelling of gas & vapour dispersion).

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3.3.4. Rationale for Exclusion of Certain Scenarios for further analysis.

The assumptions are conservative. Projectile effects are excluded due to the low risk to persons from a projectile.

A dust explosion was not included - mN fertilizer dust, being non-combustible in nature, does not give rise to a dust explosion risk, which is commonly associated with grain and organic musts.

3.3.1. Risk Contours.

The resulting risk contours for the scenarios listed in Section 3.3.2 are graphically represented on a schematic of the site, in Figure 2, (below):

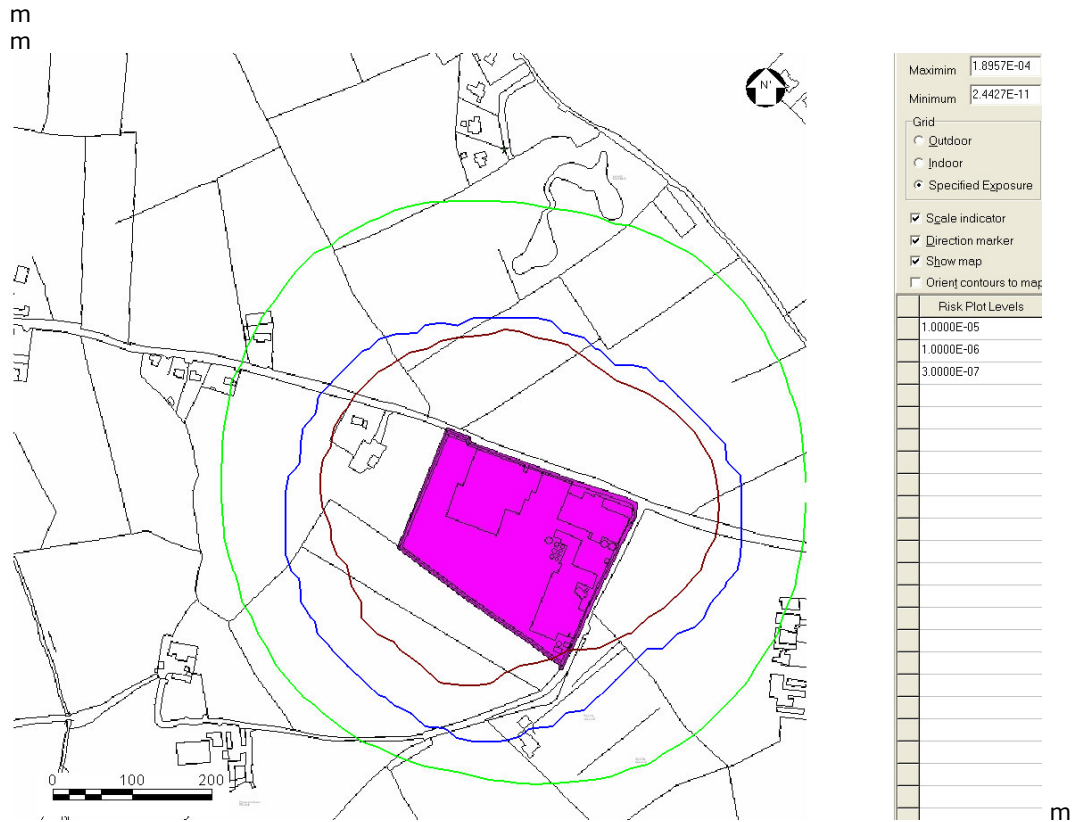


Figure 2. Risk Contours.

3.3.2. Other Issues Addressed by the Authority.

The authority is working with the operator on the implementation of measures at the establishment that will further reduce the risk profile, in accordance with good practice guidelines (see section 2 of this document, above).

4. HSA Comment on the Establishment's own Assessment.

To date, no assessment has been received from the Establishment. Their Safety Report is due for submission to the Authority in February 2007.

5. Conclusions.

Based on the foregoing assessment, the following table sets out the advice of the Authority in relation to future development in the vicinity of the establishment (the zones previously mapped in figure 2).

Zone 1: Risk > 10 persons/ha	Use against residential, office and retail, permit occasionally occupiable developments e.g. pump houses, transformer stations. Consult with H.S.A. in industrial development.
Zone 2: Risk 1-10 persons/ha	Permit workplace development. Permit residential densities from 28 to 90 persons/ha., density increasing as risk decreases across the zone in development areas and 22 to 70 persons/ha. in less developed areas. Permit most retail and ancillary local services. Use against shopping centres, large-scale retail outlets, undue concentration of restaurant/pub facilities.
Zone 3: Risk 0.3-1 persons/ha	No restrictions except for sensitive developments, which would be subject to consultation if inside the zone and should not be at a risk greater than 0.3×10^{-6} . Sensitive developments include crèches, schools, hospitals, and nursing homes. Locations of major public assembly will be subject to individual assessment.

In interpreting the above table, 'industrial' should be taken as any organization workplace development not attracting significant numbers of the public. The level of development at any location will depend on the risk at that location, but a workplace development with 75 people on-site at any time and less than 3-storeys in height is likely to be suitable, with an emphasis on placing car parks, utility buildings etc. nearest to the 1×10^{-4} risk zone.

In applying the residential densities, calculate the total area from the centre of the proposed development to the site extents within the zone area.

Notwithstanding the above, for very-high density and/or very sensitive developments or for developments in the vicinity of highly populated areas, a separate societal risk assessment may be necessary in order to furnish appropriate technical advice to the Council.

m

Appendix 1. Role of HSA (Legal Framework).

m

1. Background.

m

The Health and Safety Authority was set up under the Safety, Health & Welfare at Work Act, 1989. m

As the name implies, it is primarily concerned with the health and safety of people at work. m
The principal functions, as set out in Section 16 of that Act (now Section 34 of the 2005 Act) are: m

- To make arrangements for enforcement of relevant legislation m
- To promote, encourage and foster the prevention of accidents m
- To encourage & foster measures directed towards the promotion of health and safety of persons at work m

The Authority is divided into operational units. m

The Process Industries Unit (PIU) is responsible for the implementation of the Seveso Regulations and provision of Land-use planning advice thereunder. m

m

2. Seveso II Legal Context.

m

The Authority, acting as the Central Competent Authority under the EC (Control of Major Accidents Hazardous involving Dangerous Substances) Regulations, 2006 (SI 74 of 2006), manages technical advice to a planning authority when requested under regulation 27(1), in relation to m

- The siting of new establishments, m
- Modifications to an existing establishment to which Article 10 of the Directive applies m
- Propose development in the vicinity of an existing establishment m

SI 74 of 2006 implements Directive 96/82/EC [Control of Major Accidents Hazardous involving Dangerous Substances] as amended by Directive 2003/105/EC. Article 12 of that Directive states: .

'Member States shall ensure that their land-use and/or other relevant policies and the measures for implementing those policies take account of the need, in the long term, to maintain appropriate distances between establishments covered by this Directive and residential areas, areas of public use and areas of particular natural sensitivity or interest, and, in the case of existing establishments, of the need for additional technical measures in accordance with Article 5 so as not to increase the risks to people.' m

The Major Accidents Bureau/ Joint Research Centre of the European Commission have provided guidance in this area for the National Competent Authorities, concerning the status of technical advice furnished to planning authorities: m

'It is recognised that consideration of major accidents is only one input to the process of land-use planning controls and policies... many other considerations can be relevant, and that these may already be elaborated in various national policies and implemented in national, regional or local structure and development plans.' m

m

Exclusions m

It should be noted that the Regulations exclude certain activities: m

"These Regulations shall not apply to - m

m

(a) any property occupied by the Defence Forces and any land or premises referred to in section 268(1) of the Defence Act, 1954 (No. 7 of 1954); m

m

(b) major accidents created by ionising radiation; m

m

(c) the occurrence outside an establishment of - m

m

(i) the transport of dangerous substances by road, rail, internal waterways, sea or air, m

m

m

m
(ii) m Inter mediate temporary storage associated with a subparagraph (i) m
activity, m

m
(iii) m The loading or unloading of dangerous substances at docks, wharves or m
marshalling yards, m

m
(i) m The transport to and from another means of transport at docks, wharves or m
marshalling yards, and m

m
(n) m The transport of dangerous substances in pipelines and pumping stations. m

m
(m) m the activities of extractive industries associated with exploration for, and the m
exploitation of, minerals in mines and quarries or by means of boreholes (not excluding m
thermal processing operations and storage in oiling dangerous substances); m

m
(e) m waste land-fill sites (not excluding in some situations are operational tailings ponds m
disposal activities). m

m
It should also be noted that biological agents are not within the definition of 'dangerous m
substance' and are therefore not covered by the Regulations. m

m
In giving its advice, the authority considers only the effects of credible major accident m
scenarios at the establishment and does not deal with routine emissions. It is the m
understanding of the authority that such emissions will be subject to European or Local m
authority scrutiny and control. m

The authority's advice does not deal with site selection or the suitability of one site over m
another. m

Activities relating to site development / construction are not within the remit of the m
authority in the context of the provision of Land-use planning advice. m

m
In general, in assessing the risks or consequences of major accidents, the authority will m
always look for the best estimate. Where there are uncertainties, it will tend to take a m
conservative approach and favour that which will overestimate the consequence or risk m
rather than underestimate it. m

m

Appendix 2 Criteria for Land Use Planning.

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1 Policy in Relation to Setting of New Establishments.

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m

The question considered by the HSA when it provides technical advice to a planning authority relating to a new establishment is: m

'If operational, would the risks posed by this establishment be tolerable?' m

The Board-approved policy of the HSA in relation to Land Use for new establishments states m that: m

'It is ... necessary to demonstrate for new "Greenfield /Brownfield " establishments that m they do not present a risk of a dangerous dose greater than 5×10^{-6} /yr. to their current m neighbours or a risk of a dangerous dose greater than 1×10^{-6} /yr. to the nearest m residential type property. This may be relaxed in respect of neighbours where the new m development is the same/similar to the existing neighbours; for example new oil storage m depot being set up in a location already occupied by tank farms. m

The authority will seek from the operators of proposed establishments a detailed m consequence and risk assessment in order to help it formulate a response to a request for m advice on a planning application. m

The authority will also consider any potential impact on local access/egress arrangements m in the context of public behaviour in the event of an emergency and access for emergency m services. m

The authority will give consideration to any other issues it deems relevant to a particular m application notwithstanding what has been indicated above' m

m

2. Technical Basis for Advice – the context of Land Use Planning.

m

There are, as yet, no European or international standards for the provision of Land-use m planning advice. An Em working group (European Working Group on Land-use Planning), m which has been in existence since 2002, was set up to consider the implementation of m Article 12. The HSA represents Ireland on this group. This document has now reached final m draft status, has been adopted by the Committee of Central Competent authorities in m October 2006, and is awaiting final approval. m

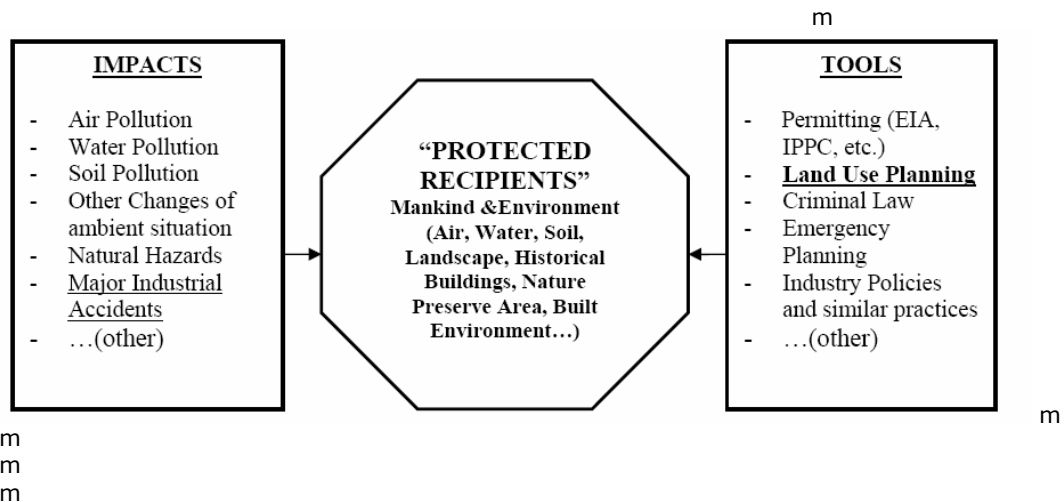
The authority provides Land Use advice in the context of the best practice described in that m document. m

It is worth noting a number of points from that document in relation to the context of Land Use m (and therefore the advice of the HSA to planning authorities). m

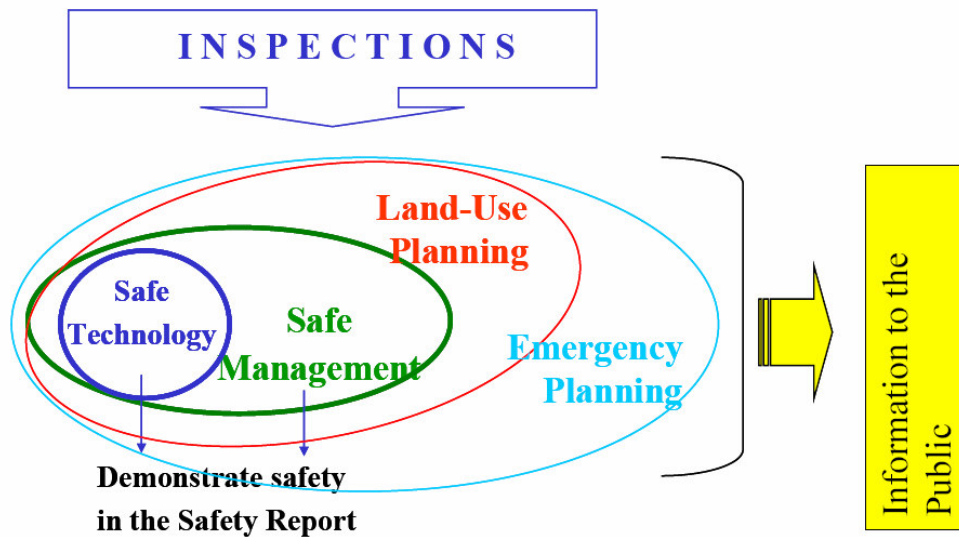
- o This document is not a page 7 of the document, Article 12 does not apply. m
retrospective, but relates only to future developments. m
- o Land Use is only one of the many tools for the protection of people and the m environment, as represented in the following graphic: m

m

m



- In the context of the Directive, it is but one of many elements available in relation to major accident hazards:



- At present in the EU, a variety of approaches are taken in developing distance limits, including:
- The use of generic distance tables, where the distance relates to activity or storage quantity
 - Consequence only. i.e. the distance is related to the consequence
 - Risk & Consequence i.e. the likelihood of the consequence is estimated
- At present, the authority takes either a 'consequence' or a 'risk and consequence' approach in relation to developments, depending on the nature of the activity. For new establishments, a 'risk & consequence' approach is usually taken. The exercise is provided concerning the potential effects of major accidents at establishments.

2.1 Establishment

m

Establishment is defined in the Regulations- m

"Establishment" means the whole area under the control of the same person where dangerous substances are present at or above the qualifying quantities (...in schedule 1) in one or more installations, and for this purpose two or more areas that contain installations under the control of the same person and separated only by a road, railway or inland waterway will be treated as one whole area. m

In practice, the establishment is usually considered to be the area within the security fence footprint where the hazardous substances are processed and stored. This area comes under the remit of the regulations. This approach has historically been taken and has been maintained following discussions between the authority and EC Commission officials and representatives of the other EC member states. m

2.2 Major Accident . m

The Regulations define a major accident as follows: m

"Major accident" means an occurrence such as a major emission, fire or explosion resulting from uncontrolled developments in the course of the operation of any establishment, leading to a serious danger - m

(a) to human health, or m

(b) to the environment, m

whether immediate or delayed, inside or outside the establishment, and involving one or more dangerous substances.' m

Major accidents inevitably involve a loss of containment of a dangerous substance. m

The general approach adopted by the authority is, therefore, to identify credible 'loss of containment' hazards, identify the consequences if such hazards were realised and, in certain cases, estimate the likelihood of those consequences. m

Because land-use planning concentrates on matters relating to off-site risks, these form the focus of the approach. Lesser, but more likely, events are therefore not usually included as they do not have off-site impacts. m

The authority examines the process and material inventories of the proposed establishment to determine the location of inventories of dangerous substances that have the potential for an off-site impact in the event of a major accident. Bulk storage tanks, gas cylinders, pipelines, process and storage areas, road tankers etc. are all likely sources. m

2.3 Credible Scenarios . m

Credible major accident scenarios that are considered (opening mon the particular establishment) include major spills, releases of flammable or toxic vapours, fires, vapour cloud explosions and boiling liquid evaporating vapour explosions [BLEVE's]. m

The selection of credible scenarios is a critical part of any analysis. In selecting such scenarios, the HSA has particular regard to the Purple Book, the CCnS, reports published by the UK Health and Safety Executive (HSE) and other reliable sources. m

Some events are not considered credible: m

- Earthquake - based on a paper by the DPB in connection with the Advanced Study P. (A. W. B. J. ACEB *Earthquake Hazard in Ireland. International Association of Earthquake and Physics of the Earth's Interior and European Earthquake Commission. The Practice of Earthquake and Hazard Assessment*, Ed. by Robert K. McGurr 150-152 1993.) m

Using a methodology set out in a UK HSE Commission research report (CRR 150 1997 *The Evaluation of a Aircraft Crash Risk in the UK*) aircraft crash can be ruled out other than for sites near an airport or significant flight path. m

Other off-site initiators of major accidents are considered on a case-by-case basis. They will not be included if - m

- The event is of equal or lesser damage potential than the events for which the plant has been designed m

- The event has a significantly lower frequency of occurrence than other events with similar uncertainties and could not result in worse consequences than those from other events.
- The event cannot occur close enough to the plant to affect it.
- The event is included in the definition of another event.
- The event is slow in developing and there is sufficient time to eliminate the source of the threat or to provide an adequate response.

On the other hand, instantaneous failure of storage tanks and pressure vessels may be considered credible, as are full-bore pipeline failures and fires in storage areas. The precise events chosen are based around 'Event Trees', which describe the different scenarios that could result from the loss of containment. For example, for a leak of flammable pressurised gas, is given below.

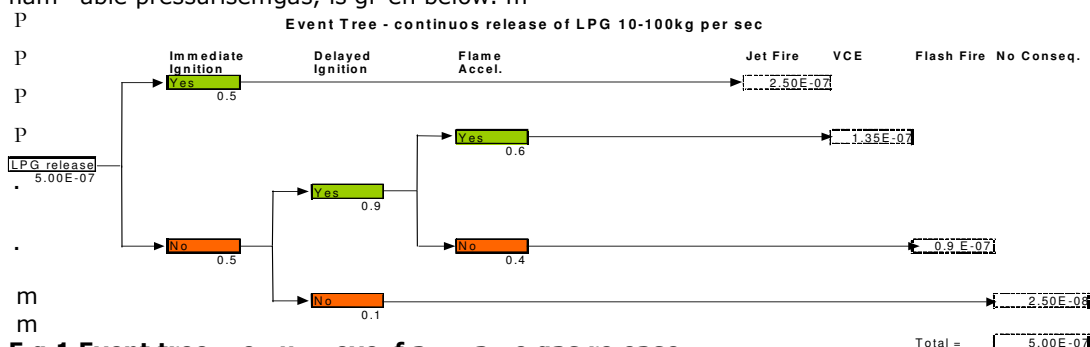


Fig 1 Event tree . e . u . level of a . a . e gas release .

The HSM tends to use a high probability of on-site ignition even though more detailed models might predict lower probabilities.

For many events the weather will be an important variable. The HSM will often use weather data from the nearest weather station in F₂ and D₅ conditions (see note 3, appendix 3 on dispersion modelling), as supplied by Met Éireann and refer to the authority. If the site is a very great distance from any of the named weather stations then the authority will use the F₂/D₅ weather-stability pairs for dispersion modelling, assuming a split of 25% F₂ and 75% D₅; this will give a more conservative result than using data from any of the known stations.

For new establishments the authority performs an 'Intermediate Quantitative Risk Assessment (QRA)', in that a representative set of incidents is chosen and historical frequency values are applied. Given the conservative approach adopted by the authority, insofar as off-site risk is concerned, this will yield results equivalent to a detailed QRA.

2.4 The Consequences of Major Accidents .

Different types of physical effects could result, depending on the hazard:

Hazard . .	Effect .
Release of Toxic material	Contamination of air/water
Vapour cloud explosion, physical explosion	Overpressure wave, Heat flux, physical effects of projectiles
Pool Fire, Jet Fire, BLEVE	Heat Flux
Flash fire	

Table 1: Major Accident Consequences .

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m

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2.4.1 Effects of overpressure .

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'level of concern' at which these effects could be experienced must be chosen in order to make
draw conclusions about impact

The effects of overpressure are set out below:

m

m

m

S d -on P

IOv rpr P r

E

E

(a) E E DP cr pt on of Damag P

P		
PP	0.15 P	Annoy ng no P P
P		
PP	0.2 P	Occa lonal br a hng of larg w ndowpan P alr ady Pnd r Rra n P
PP	0.3 P	Lo l no P ; lbn c boom gla P fal r P
PP	0.7 P	Br a ag of lmall w ndowPPnd r Rra n P
PP	1 P	Thr lhold for gla Pbr a ag P
PP	2 P	"Saf d Ranc ," probabl ty of 0.95 of no P r o P damag b yond P
PP	P	th Pval P; lbn P damag to ho P c l ng ; 10% w ndow gla PP
PP	P	bro Pn. P
PP	3 P	L m t d m lhor ltr ct ral damag P
PP	3.5-7 P	Larg and lmall w ndowPP ally lhatt r d; occa lonal damag to P
PP	P	w ndow framP P
PP	5 P	M lhor damag to ho P ltr ct r PP
PP	8 P	art al d mol t on of ho P , mad Pn nhab tabl P
PP	7-15 P	Corr gat d a b Pto lhatt r d. Corr gat d R l or al m n l m P
PP	P	pan l fa t n ng fal, followl by b l l ng; wood pan l (tandard P
PP	P	ho P ng) fa t n ng fal; pan l blown n P
PP	10 P	St l framP of clad b lld ng lghtly d Rort d P
PP	15 P	art al collap P of wall and roof of ho P P
PP	15-20 P	Concr t or cnd rbloc wall , not r nforc d, lhatt r d P
PP	18 P	Low l m t of P r o P ltr ct ral damag 50% d ltr ct on of P
PP	P	br c wor of ho P P
PP	20 P	HPavy mach n P n nd Ptral b lld ng P ff r d l t l damag ; t l P
PP	P	framP b lld ng d Rort d and p lld away from fo ndat on P
PP	20-28 P	Framl P, P lf-fram ng R l pan l b lld ng d mol h d; r pt r P
PP	P	of o l Rorag tan P P
PP	30 P	Cladd ng of lght nd Ptral b lld ng r pt r d P
PP	35 P	Wood n Ptl ty pol P l happ d; tall hydra l c pr P n b lld ng P
PP	P	lghtly damag d P
PP	35-50 P	N l rly compl t d ltr ct on of ho P P
PP	50 P	Load d tan car ov rt rn d P
PP	50-55 P	Unr nforc d br c pan l , 25-35 cm th c , fal by l h ar ng or P
PP	P	fl x r P
PP	60 P	Load d tra n boxcar compl t ly d mol h d P
PP	70 P	robabl total d ltr ct on of b lld ng ; h avy mach n tool P
PP	P	mov d and badly damag d P
P		

Table 2: Damage Produced by Blast m

m

Source: Guidelines for Evaluating Characteristics of Vapor Cloud Explosions, Flash fires and BLEVES, CCNS 1994, ISBN 0-8169-0474-X, based on the work of Glasstone (1977)). m
(Note 1 k a = 10 mbar) m

m

The Second Canby Report has a table for overpressure effects on humans: m

m

m

m

p

m

O/Press .re . (ps) .	O/press .re . (. ar) .	O/Press .re . (kPa) .	H. an Effects .
5 m	340 m	34 m	Threshol m of m ear ru mamage m
10 m	690 m	69 m	Threshol m of lung m amage m
40 m	2760 m	276 m	Threshol m of m ortality m

Table 3: Effects of Overpressure on Humans .

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m
m

2.4.2 Effects of Thermal Radiation .

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Similarly, the effects of heat radiation can be listed as follows:

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m

Radiation Intensity (kW/m ²)	Structural Damage
37.5 m	Sufficient to cause damage to process equipment m
25 m	Minimum energy to ignite wood at infinitely long exposures (non-m piloted) m
12.5 m	Minimum energy for pilot ignition of wood, melting of plastic tubing. m
9.5 m	Pain threshold reached after 8 sec; second degree burns after 20 m seconds m
4 m	Sufficient to cause pain to personnel if unable to reach cover in 20 sec., m secondary burns likely, 0% lethality. m
1.6 m	Will cause no discomfort for long exposure m

Table 4: Effects of Thermal Radiation (Worland Bank, 1985)

m
m

2.4.3 Threshold Levels of concern (Dangerous Dose) .

m

The threshold 'levels of concern' used by the authority are:

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Consequence .	Level of Concern .
Contamination of air m	Dangerous dose (Concentration varies with m substance & exposure length) m
Overpressure wave m Missiles m	600 mbar, 140 mbar, 70 mbar m Distance travelled by a % of projectiles, 100m m for cylinders/ drums m
Heat Flux, Thermal Dose m	1800, 1000, 500 TDM m

Table 5: Levels of Concern used by HSA .

m

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m
 dangerous nose is refine as one where there is severe mistress to almost everyone. m m
 substantial fraction requiring medical attention. Highly susceptible people might be killed m
 It assumes that most people are/can go in doors and will be less likely to suffer a m
 dangerous nose therein (with the exception of overpressure, where in certain circumstances m
 they may be more at risk due to building damage). m

Where a full risk-based approach is taken, the levels of concern are: m

Consequence .	Level of Concern .
Contamination of air with toxic m	Dangerous mDose n(Concentration maries mwith msubstance) m
O erpressure warnem Missiles m	Dangerous Dose = 140 mbar m Distance mspecific mto mement: ma m% mtravel m istance, 100m for cylin ers/ ru ns .
Heat Flux, Ther al Dose m	Dangerous Dose = 1000 TDm (75s exposure m for mol & Jet Fire, Fireball muration for BLEVE) m

Tabelle 6: Dangerous Dose for different consequences.

Thermal dose unit (TDm) is a measure of the heat flux and its duration. 1000 TDm is taken as the 'dangerous dose' based on research work commissioned by the HSE (CRR 285 m of 2000- Thermal Radiation Criteria for Vulnerable populations) [8].

The 140mbar noise-on non-pressure figure is taken as the 'dangerous noise' for non-pressure, and the 70mbar figure is the limit for sensitive elements i.e. no fatalities even for sensitive elements (*Safety Cases for Consultation Datasheets For 2 Major Hazard Installations*, 1997 – see ref 8, appendix 3))

To calculate the distances from the source at which these end points could be expected, commercial software is used. The modelling software typically used by the authority includes PATH (DNV Technica), MOLOM (MSEm), TSCREEN (MSEm), methods from the American Institute of Chemical Engineers' Centre for Chemical Process Safety and the Yellow Book (note 1, appendix 3 gives a brief outline of these software programmes). To determine how likely it is that these effects will happen, other software is used, most commonly RISK LOT.

The output of all this analysis is a series of individual risk profiles overlaid on a map of the metropolitan area and its surroundings, illustrating the individual risk of receiving a dangerous mosquito bite.

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2.5 To era . e R sk .

The following table, taken from The Second Can ey Report lists some common risks of mental fatality:

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Event .	No . of .	Chance . of . the . Average .
Fata .t es .	In . v . a Be ng K . e . .	
Motor m ehicle m acci ents m	7,219 m	1.3 chances in 10 000 a year* m
cci ents in the m home m	6,717 m	1.2 chances in 10 000 a year* m
cci ents m at m work m	753 m	0.3 chances in 10 000 a year** m
Others m	3,646 m	0.6 chances in 10 000 a year* m
Total m	18,335 m	m

* Averaged over the total population of Great Britain.

** Averaged over 22 million employees.

Ta . e 7: R sk of . eath fro . . acc . ents .

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The risk of death from natural causes for different age-groups is shown in the following table:

R sk . of . . eath . fro . . nat ra .	ca .ses .n age gro .ps .
Age . .	R sk .
0- 4	m 34.4 in 10 000 m a year m
5-14	m 1.9 " " " m
15-24	3.0 " " " m
25-34	4.8 " " " m
35-44	m 16.2 " " " m
45-54	m 55.0 " " " "
55-64	m 147.7 " " " m
65-74	m 422.3 " " " "
75-84	m 1, 073.0 " " "
85+	m 2, 023.5 " " "

Ta . e 8: R sk of . eath fro . . natura causes .

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Statistics available from the HSMon occupational fatality rates: m

Economic sector	Data series		Rate at work (QNS 2002)	Rate per M. on
	2002	2002		
Agriculture, Forestry and Hunting	13 m	11 m	121,700 m	115 m
B - Fishing	3 m	3 m		
C - Mining and Quarrying	2 m	2 m		
D - Manufacturing	7 m	5 m	310,400 m	22.5
E - Electricity, Gas and Water Supply	2 m	0 m		
F - Construction	21 m	20 m	183,200 m	109.1 m
G - Wholesale and Retail	1 m	0 m	249,100 m	0 m
H - Hotels and Restaurants	0 m	0 m	108,700 m	0 m
I - Transport, Storage, Communication	8 m	7 m	108,900 m	64.2 m
J - Financial Intermediation	0 m	0 m		
K - Real Estate, Renting and Business activities	1 m	1 m	226,400 m	4.4
L - Public Administration, Defence and Social Security	2 m	2 m	82,000 m	24.3 m
M - Education	0 m	0 m		
N - Health and Social Work	0 m	0 m	260,000 m	0 m
O - Other	1 m	1 m	94,900 m	10.5 m
Total	61 m	52 m	1,745,500 m	34.9 m

Table 9: Fatality Rates per 100,000 Workers

m

Risk that is broadly acceptable is that which is trivial in comparison to the risk experienced in daily life. At the other end of the scale there clearly is a level of risk that is unacceptable. In coming on Lm criteria the HSM concludes that for the general residential public an individual risk of no greater than 1×10^{-5} (i.e. 1 in 100,000) per year would not be intolerable for developments around existing establishments, and for new establishments it should not exceed 1×10^{-6} (i.e. 1 in 1,000,000).

[illegible]

2.6 Criteria Use . . . in other countries for Land-Use Planning .

The following are some of the better- e elope criteria: m
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Maximum tolerable risk for worker in industrial plant	1 in 1,000 per annum
Maximum tolerable risk for public in industrial plant	1 in 10,000 per annum
Benchmark for new plant and developments	1 in 100,000 per annum
Broadly acceptable public risk	1 in 1,000,000 per annum
Land-use planning - Residential development unrestricted.	1 in 1,000,000 per annum (Dangerous Dose)
Netherlands	
Maximum tolerable risk for existing situations	1 in 100,000 per annum
Maximum tolerable risk for new developments	1 in 1,000,000 per annum
Maximum tolerable risk around airports, above which rehousing is required	1 in 20,000 per annum
Broadly acceptable public risk	1 in 1,000,000 per annum
Australia	
Acceptable risk to the public in residential zones from hazardous industries	1 in 1,000,000 per annum
Hospital, Schools, Child-care	0.5 in 1,000,000 per annum
Acceptable total risk within hazardous industrial zones	1 in 10,000 per annum

Table 10: Various National Characteristics (factors that are unique to each state).

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2.7 Presentat on of R sk .

Risk figures can be confusing. The following figure shows some of the mifferent ways that m risk can be presentem m

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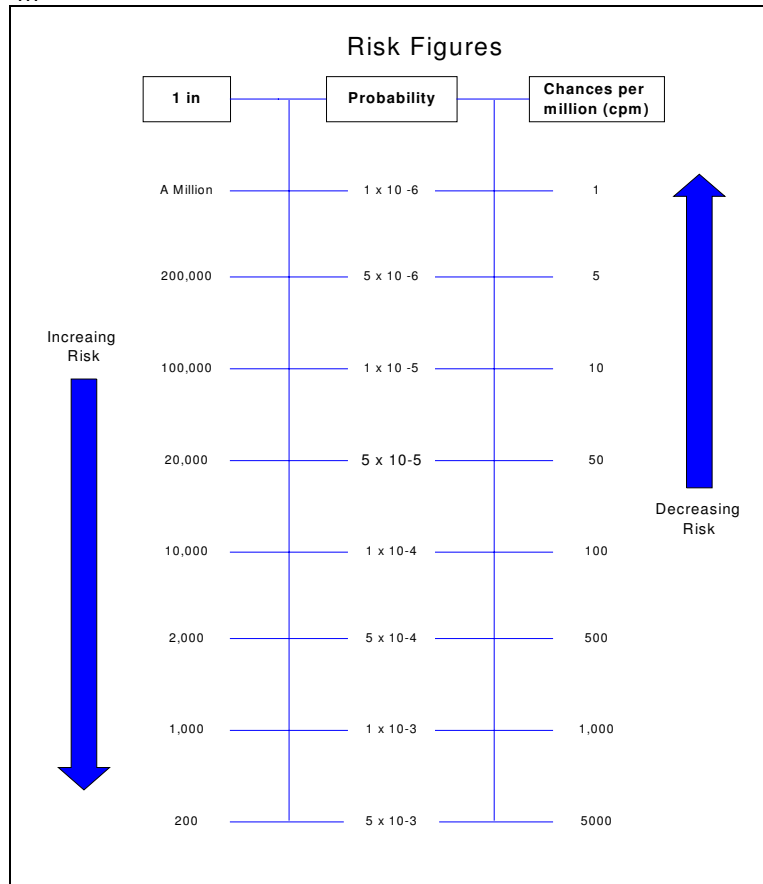


Figure 2: Ways of Present ng R sk m

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2.8 C ass f cat on of Deve op . ent Types .

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In gi ng Lm am ice, the HSmclassify e elop nents un er one of the following categories: m

- Resi ential m
 - Retail an catering m
 - Com ercial m
 - In ustrial m
 - Sensiti e me.g. mhospital, msome mschools, moutmor mleisure mcomplexes metc.: m
- elop nents of this nature are subject to special analysis m

m

The following table sets out the risk zones that are esti atemfor the purposes of offering m lan -use planning am ice: m

(figures are relatemto the in i i ual risk of recei ng a nangerous nose, per year) m

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Zone	Risk
Zone 1.	$> 1 \times 10^{-5}$ (i.e. > 10 cp m)
Zone 2.	$1 \times 10^{-6} < R < 1 \times 10^{-5}$ (i.e. $1 - 10$ cp m)
Zone 3.	$0.3 \times 10^{-6} < R < 1 \times 10^{-6}$ (i.e. $0.3 - 1$ cp m)

Table 11: Risk zones for LUP.

The Land use mix for the different zones is as follows:

Zone 1:	Use against residential, office and retail, permit occasionally occupiemment e.g. public houses, transport stations. Consult with H.S.A. re. Industrial development.
Zone 2:	Permit workplace development. Permit residential densities from 28 to 90 persons/ha., density increasing as risk decreases across the zone in development areas from 22 to 70 persons/ha. in less development areas. Permit most retail and ancillary local services. Use against shopping centres, large-scale retail outlets, undue concentration of restaurant/pub facilities.
Zone 3:	No restrictions except for sensitive developments, which would be subject to consultation if inside the consultation range and should not be at a risk greater than 0.3×10^{-6} . Sensitive developments include crèches, schools, hospitals, and nursing homes. Locations of major public assembly will be subject to individual assessment.

Table 12: LUP Advice zones. Use. on Risk.

The advice with respect to housing density in Zone 2 is based on consideration of the analysis given in "Worst Case" Methodology for Risk Assessment of Major Incident Installations" in Process Safety Progress [Vol. 19, No. 2].

Use of the criteria as outlined above will provide a basis for the advice on the acceptability of a new 'Sensitive' establishment and for justifying a separation distance between Sensitive establishments and off-site developments. These criteria do not guarantee an absence of risk but suggest a tolerable level, given that major accidents with offsite damage are relatively uncommon. They represent an attempt to balance a potential for harm against a social requirement that large tracts of land should not be unnecessarily sterilised for future development.

The criteria will be subject to on-going review and revision in the light of new knowledge and ongoing experience.

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2.9 Societal Risk.

The approach as set out above includes an element of societal risk in terms of the amplitude for each of the zones ('residential densities from 28 to 90 persons per ha.' 'medium retail', 'large-scale' etc.). In most cases no further assessment of societal risk is necessary. However, for very-high density or very sensitive developments or for developments in the vicinity of highly populated areas a separate societal risk assessment may be necessary.

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2.10 Consequence-based approach.

It is the view of the authority that, for existing sites and for those sites presenting thermal or overpressure hazards only, it may be more appropriate to take a consequence-based approach (Note 2 of appendix 3 gives an overview of consequence and risk based assessments). This takes into account the additional physical damage to buildings and structures resulting from these types of hazards, over and above the direct hazard to people that result from toxic exposure. It also reflects the omnidirectional nature of these hazards. The following scenarios are considered:

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- instantaneous loss of contents from tanks, drums or cylinders
- full-bore rupture of pipelines and smaller leaks
- burning or topping
- pool, burning and building fires
- rupture of projectiles
- releases from reaction vessels in the event of loss of control
- road tanker failures leading to spillage, fire or explosion
- vapour cloud explosions
- solid-phase explosions

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In general, the worst credible scenarios are selected.

The amplitude zones for a consequence-based approach are as follows:

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Thermal and Overpressure Effect:

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Zone	Amplitude
Inner Zone Source-1800 TDmm Source-600 mbar m	Industrial [subject to consultation], Occasional occupation by small number
Medium Zone 1800-1000 TDmm 600-140 mbar m	Commercial & industrial <100 persons, retail & catering <250m ²
Outer Zone 1000-500 TDmm 140-70 mbar m	Commercial, retail & catering, industrial, small housing developments.

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3 Major Accidents, Land-use Planning Advice and Environmental Effects.

The authority's technical advice to the planning authority deals with the potential effects of major accidents. In relation to the environment the advice is concerned only with those environmental effects that are related to major accidents and it does not consider routine emissions, which are within the remit of the local authority or EPA, and subject to licence. m

Currently, there is no common approach within the EPA on suitable scenarios or endpoints for the assessment of Major accidents to the Environment (MATEs) within the framework of the Sema 11 Directive. Consequently, such assessment tends to be more qualitative than the approach concerning major accidents and the potential effect on human receptors. This qualitative approach is due to the highly variable nature and sensitivity of environmental receptors, and to the lack of suitable sensitivity data for all receptors, and the multiplicity of such receptors in the environment. m

The approach of the HSA in the consideration of environmental effects associated with Sema 11 establishments, is also conscious of the requirements placed on operators (current and proposed) by Regulation 9 of S.I. No. 74 of 2006. In assessing the consequences of potential worst-case credible accidents and their impacts on the environment, the HSA concentrates on Regulation 9(2)(e), requiring operators to use best practicable means – m

- to prevent a major emission of dangerous substances resulting from uncontrolled developments from any part of the establishment, into the environment, and
- for rendering harmless and inoffensive such substances as may be so emitted m

The Seventh Schedule to S.I. 74 of 2006 lists the criteria for notification of accidents to the Commission. Major accident hazards should have this type of potential in order to be considered m

More practical information on what might constitute a major accident to the environment is given in guidelines from the HSA in relation to major accidents to the environment [Guidance on Interpretation of Major Accident to the Environment (r 2.5) - Oct 2003] which in turn is adapted from guidance issued by the UK Department of the Environment, Transport and the Regions. m

A major accident to the environment will occur as a result of a major emission, fire or explosion resulting from uncontrolled developments in the course of the operation of any establishment and resulting in significant damage to the natural or man-made environment. This damage could be relatively long lasting but not necessarily irreversible. Recovery of habitats can take considerably longer depending on the dangerous substance in question. The assessment of major accidents to the environment focuses on the specific risks to sensitive receptors within the local environment, the extent of consequences to such receptors, and on the ability of such receptors to recover. m

HSA Approach.

The approach of the authority, therefore, is not to examine potential impacts on the environment from the identified credible major accident hazards and satisfy itself that appropriate 'best practicable means' are/will be in place to prevent such impacts. Best practicable means might constitute an equivalent for storage tanks containing dangerous substances allied with tertiary containment to prevent migration off-site of any non-toppling fraction, or contaminated fire fighting water, for example. m

The potential for initiating a major accident due to natural phenomena is also examined. For example, the effect of flooding, storm damage, subsidence is considered in relation to the potential effect on storage tanks and storage areas, as well as important site utilities. The operator must demonstrate that other potential initiators have been considered (lightning for example) and control/mitigation measures employed where required m

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While the 'best practicable means' standard is also applied to control of gaseous loss of contaminants (e.g. suitably-sized catch pots for reaction vessels), the consequences of such releases are examined as part of the general major accident scenarios for human receptors. m

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Article 12 of the amended Directive requires Member States to 'take account of the need, in the long term, to maintain appropriate distances between establishments covered by this Directive and residential areas, buildings and areas of public use, major transport routes as far as possible, recreational areas and areas of particular natural sensitivity or interest...' m

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Where the authority notes such areas in the vicinity of an establishment it undertakes further analysis not to satisfy itself that an appropriate distance can be maintained. m
Appropriate distances are not specified in the Directive. However a separation distance will be considered appropriate if it is sufficient to enable the installation and operation of suitable control and mitigation measures, and/or is such that the risk of serious damage is low in the event of a major release. m

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4. Petroleum Bulk Stores, Land Use Planning and Environmental Criteria.

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Background.

The earlier part of this appendix has set out the general approach of the Authority regarding the provision of Land Use Planning (LUP) advice in the previous section in more detail in relation to the environment.

This document sets out the Authority's position in formulating land-use planning advice for new petroleum bulk storage installations with particular consideration of appropriate environmental criteria.

In the case of new installations at existing establishments, a similar approach will be adopted. In some instances, due to spatial constraints on other sites, or other considerations relating to their layout, particular site-specific measures may have to be designed in order to fulfil the 'best practicable means' criteria. In these cases consultation with the Authority at an early stage in the design process with justification on how the proposed design in terms of meeting the 'best practicable means' criteria.

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Legislative basis.

Under the Seveso II Directive [96/82/EC as amended by 2003/105/EC] there is a requirement to ensure that the objectives of preventing major accidents and limiting the consequences of such accidents are taken into account in the land use policy of member states. Further, there is a requirement to take account of the need in the long term, in order to maintain appropriate distances between establishments covered by the Directive and residential areas, areas of public use and areas of particular natural sensitivity or interest. Such appropriate distances are not specified in the Directive or transposing Regulations, but would generally be considered sufficient if they allow the installation of suitable control and mitigation measures to provide adequate protection to the environment, or if their extent is such that the risk of serious damage to the environment is low in the event of a major release. Under the EC (Control of Major Accident Hazards involving Dangerous Substances) Regulations, 2006 [SI 74 of 2006], which transpose the Seveso II Directive, in a provision specifically relating to the general duties of operators, Reg. 9(1)(b) requires the operator to take all necessary measures to limit the consequences of any major accident to the environment, while 9(2)(c) further qualifies this by stating that such necessary measures shall include the making of arrangements to ensure that the use, handling, storage, and transport of dangerous substances in the establishment are, so far as is reasonably practicable, without risk for man and the environment, and 9(2)(e) that in the use of best practicable means to prevent a major emission into the environment from any part of the establishment of dangerous substances resulting from uncontrolled developments in that establishment, and for rendering harmless and inoffensive such substances as may be so emitted.

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Petroleum Bulk Stores & Major Accidents to the Environment.

The Directive specifically applies to "major accidents" as defined. That is to say, an occurrence such as a major emission, fire or explosion resulting from uncontrolled developments in the course of the operation of any establishment, leading to a serious danger to human health or the environment, whether immediate or delayed, inside or outside the establishment, and involving one or more dangerous substances. By definition therefore, a major accident can only be considered under the terms of the Directive, if it is caused by a dangerous substance as defined under articles 1 and 2 of Annex 1 of the Directive. Motor vehicle petrol and other petroleum spirits (including diesel) are listed as dangerous substances in Part 1 of the First Schedule of S.I. 74 of 2006 and as such are dangerous substances. In addition, other relevant substances are classified under the generic category of Dangerous to the Environment, and are therefore also considered dangerous substances under the terms of the Directive. Materials not so classified as a dangerous substance, or not provisionally classified as a dangerous substance, though they may possess other properties that could cause ecological disruption, are outside the scope of the Seveso II Directive.

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Many of the larger petroleum bulk stores are located adjacent to areas of natural sensitivity (ports, etc.). Such locations may also be designated as can i ate Special areas of Conservation (cSAC's), or by virtue of populations of significant bird populations, as in Special protection areas (SPAs). Thus, the potential consequence to the natural environment as a result of a major spillage event to that environment is likely to be more severe. However, the long-term (and perhaps even short-term) consequences associated with some materials may be less significant. Non-persistent oils, such as kerosene for example, by virtue of their relatively quick degradation rate, will pose a lesser danger to the environment than the more persistent oils (crude oil for example).

Along with spillage of inventory, the generation of contaminated firewater in the event of a major fire must also be considered.

Business

Retention of a major emission into the environment, in the context of petroleum bulk stores, is generally prohibited by law. The general requirement is for 110% of the maximum capacity of the largest tank, or 25% of the total tank capacity, where more than one tank exists in the business, whichever is the larger figure. The statutory requirements of S.I. No. 313 of 1979 (Dangerous Substances (Petroleum Bulk Stores) Regulations) must be complied with. In addition, the UK's HSE publication "The Storage of Flammable Material in Tanks (HSG 176)" provides further guidance on an appropriate approach to spillage containment.

Risk Assessment

In terms of site-specific environmental risk assessment, the UK's Guidance Note on the Storage and Transfer of Schematics provides a recommended approach (under Section 5 of that document). Additionally, it sets assessment criteria based on the German Environment Agency's approach of using water hazard classes – i.e. either non-hazardous or one of the following classes: WHC 1 – low hazard, WHC 2 – hazardous, or WHC 3 – more hazardous. Assignment of the WHC class is based on the risk phrases of the materials in question and other considerations such as biodegradation rate, bioaccumulation etc. The full detail of how this class is assigned can be obtained directly from the German Environment Agency website at <http://www.umweltbundesamt.de/wgs-e/index.htm>, where a search can be made using CAS numbers or the substance name. In addition, the downloads section demonstrates how substances and mixtures can be self-classified based on the risk phrases as applied by the Classification, Packaging and Labelling system of legislation (Directive 67/548/EEC as amended by Directive 99/45/EC).

Furthermore, UK's Guidance Note goes on to provide a simple risk category table based on this risk classification criteria and associated quantities stored.

WHC Class			
Vol. (m ³) or mass (t)	1	2	3
<0.1	m	m	m
0.1 – 1	m	m	B
1 – 10	m	B	C
10 – 100	m	C	D
100 – 1000	B	D	D
>1000	C	D	D

Generally, category 1 equates to low risk, B to medium risk, while categories C and D equate to higher risk. Particular consideration needs to be given in relation to sensitive environmental receptors in cases of onshore facilities of category D and underground facilities of categories C and D. Section 5.3 of the guidance note provides detail on retention requirements associated with each WHC class while Section 6 provides guidance on the design and operation of retention facilities (businesses), which are categorised as Class

1, 2 or 3 on the basis of low, moderate, or high hazard potential. The Emergency note should be consulted for further information. It should be noted that the nature of dangerous substances and their associated molasses stored at petroleum bulk stores is likely to classify such sites as category C or D, that is to say possessing a high potential for pollution in the event of a major release, and would ordinarily require containment systems to be designed to a high standard. Provision for holding contaminated firewater should be facilitated into the overall containment design. Key activities with major accident potential should be promoted with an open environment of protection (e.g. in open environment high level alarms and leak detection system, allied with physical secondary and tertiary containment). Again, referral is made to the Emergency note for specific design criteria appropriate to these categories.

Bundling . Overtopping .

The issue of bundling and overtopping is not dealt with specifically in the Emergency note. It is examined by the HSA as a potential scenario with respect to Series II establishments in terms of the provision of Land Use Planning. Such a scenario is considered highly unlikely but credible, and the consequences in terms of the Seventh Schedule of the Regulations (i.e. will a major accident to the environment ensue?) and the receptors that will be affected must be considered again, referring to those sites that would qualify as possessing a higher potential for pollution, then provision for containment of the overtopping fraction in the event of catastrophic failure must also be considered in the overall design to take account of this scenario. For example, the provision of tertiary containment and associated drainage systems to contain and hold up to 110% of the maximum calculated overtopping fraction is considered by the authority to be an appropriate approach. How much tertiary containment is provided will vary much depending on site-specific conditions. Therefore, consultation should be made early at the design stage with the authority in order to ensure that the proposed approach is satisfactory.

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References Cited

1. 'Criteria for land-use Planning' – Appendix 3 of 'Land Use Planning Advice for Mayo Co. Council', HSA, April 2004
2. The Storage of Flammable Liquids in Tanks – HSG 176 – Health and Safety Executive
3. S.I. 74 of 2006 – European Communities (Control of Major Accident Hazards Involving Dangerous Substances) Regulations
4. Directive 2003/105/EC of the European Parliament and of the Council of 16 December 2003 amending Council Directive 96/82/EC on the control of major-accident hazards involving dangerous substances
5. S.I. 313 of 1979 – Dangerous Substances (Petroleum Bulk Stores) Regulations 1979
6. Environmental Protection Agency IPC Guidance Note on Storage and Transfer of Materials for Scheduled Activities, May 2003
7. Environmental Protection Agency (Draft) Guidance Note to Industry on the Requirements for Fire-Water Retention Facilities, 1995 ISBN 1 899965 165

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Appendix 3 – Software, approaches to risk assessment, weather.

1 Software Models.

(a) ALOHA: m

ALOHA, available from the US Environmental Protection Agency, is an emergency response model developed primarily for rapid deployment by responders, as well as for use in emergency preplanning. It incorporates source strength, as well as Gaussian and heavy gas dispersion models and an extensive chemical property library. More than 700 pure chemicals and a small number of aqueous solutions are included in ALOHA's chemical library. m

ALOHA quality assurance has been performed in two stages: m

(1) ALOHA source and dispersion estimates have been systematically tested against output from similar models. m

(2) ALOHA evaporation rate estimates have been compared against measurements from both boiling and non-boiling pools. Neutrally buoyant gas concentration predictions have been compared against concentrations measured during Project Prairie Grass. Heavy gas dispersion predictions have been compared against DEGADIS predictions for six heavy gas field releases (Desert Tortoise, Gol fish, Maplin Sands, Burro, Eagle, and Thorney Island). m The latest version can also be used to model thermal and overpressure effects. m

(b) PHAST

PHAST is a commercially available software package produced by DNV Technica. PHAST is designed for use in assessing situations which present potential hazards to life, property and the environment and to quantify their severity. m

It uses a built-in chemical and parameter database for 46 substances, with incomplete data for many more. m

It uses the modified Dispersion Model (DM) to estimate dispersion of releases to the atmosphere. The model has been well validated. m

PHAST can also be used to model thermal and overpressure effects. m

2. Consequence and risk assessment hazard assessments.

2.1 Consequence assessment Approach: m

The "consequence based" approach (for which sometimes the term "deterministic approach" is used) is based on the assessment of consequences of conceivable accidents, m without quantifying the likelihood of these accidents. The concept behind the use of this approach is to avoid tackling the uncertainties related to the quantification of the frequencies of occurrence of the potential accidents. m

The extent of consequences provides a measure of the severity of the potential accidents in dependence of their likelihood. These are used as a criterion in the "consequence based" approach. The consequences of the accidents are taken into consideration quantitatively by estimating the distance to which the physical magnitude describing the consequences m reach (e.g. a threshold toxic concentration corresponding to the beginning of the undesired effect such as fatality), for a given exposure period. m

Several conceptual approaches which are relevant to determining a consequence distance m can be used for example: m

- for toxic releases, determination of a distance corresponding to a lethal toxic dose or serious injury (e.g. LC1%, that is the Lethal Concentration corresponding to the "first death" or lethality 1%); m
- for thermal effects from fires, determination of a distance corresponding to a thermal radiation which, for a given exposure period, can cause burns likely to be lethal or cause serious injury; m
- for explosions, determination of a distance corresponding to an overpressure likely to be lethal or cause serious effects. m

2.2 Risk assessment Approach: m

Another category of approach used is the "risk based" approach (also known as the "probabilistic" approach). Various names have been used for this category, such as probabilistic Risk assessment (R), probabilistic Safety analysis (S), and Quantified Risk assessment (QRA). Their purpose is to evaluate the severity of the potential accidents, and to estimate the likelihood of occurrence. For estimating the likelihood of m

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scenarios various methods are in use, ranging from simple selection of scenarios and frequencies from the relevant databases to the application of sophisticated tools, such as Event Tree and Fault Tree analysis. In that sense, and since explicit calculation of the frequencies of possible accidents takes place, the "risk based" methods seem to be more complete in the analysis of risk than the methods previously described. However, they are more complicated, more time-consuming and more expensive.

In general, the "risk based" approaches refine the risk as a combination of the consequences derived from the range of possible accidents, and the likelihood of these accidents. Therefore, they usually consist of five phases:

- identification of hazards,
- estimation of the probability of occurrence of the potential accidents (taking into account the safety/preventative measures and systems),
- estimation of the consequences of the accidents,
- integration into overall risk indices,
- comparison of the calculated risk with acceptance criteria.

Risk may be expressed in terms of (i) the individual risk, refined as the probability of fatality (or a specified level of injury) due to an accident in the installation for an individual being at a specific point, and (ii) the societal risk, refined for different groups of people, which is the probability of occurrence of any accident resulting at fatalities greater than or equal to a specific figure.

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3 Weather Stability Classes.

Weather conditions in hazard studies are generally described in terms of an atmospheric stability condition and a wind speed. e.g. D₅ indicates Pasquill stability class D with a wind speed of 5m/s. The Pasquill stability class (see table below) is a measure of the air turbulence which in turn is influenced by the level of solar radiation. The level of air turbulence influences the rate at which gas clouds dissipate to safe levels as they drift away from the source of the release.

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Wind at 10m height	Solar Radiation			Nighttime cloud cover	
	Strong	Moderate	Slight	>=4/8	<=3/8
<2 m	A	B	C	D	E
2-3 m	B	C	D	E	F
3-5 m	C	D	E	F	G
5-6 m	D	E	F	G	H
>6 m	E	F	G	H	I

P

The classes A-I represent the stability as follows:

- | | |
|------------------------|----------------------|
| A: extremely unstable | D: neutral |
| B: moderately unstable | E: slightly stable |
| C: slightly unstable | F: moderately stable |

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1. Position paper on the provision of Land-use planning advice in the context of the European Communities (Control of Major Accidents Hazardous and Dangerous Substances) Regulations, 2000 (S.I. No. 476 of 2000). m

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m

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m

6. Guidelines for Evaluating the Effects of Vapour Cloud Explosions using a TNT mEquivalency Method, FM Global, 1994. m

m

7. Guidance on Land-use planning as Required by Council Directive 96/82/EC (ISBN 92-m828-5899-5) m

m

8. Safety Cases for Consultation Distances for Major Hazard Installations, m97, Report from Safety Cases within the CIM Regulations 1984, Edited by F.m Lees & M.L. King, mButterworth 1989 m

m

m

Appendix 4 - Approach to Ammonium Nitrate Fertilizer (ANF) Storage Plants – The HSA Approach to Technica LUP Advice.

m

1. Introduction.

This appendix sets out the approach of the HSA in relation to the provision of land-use planning advice in regard to establishments storing ANF.

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2. Properties of Ammonium Nitrate.

ZVG-Number : 3750
CAS-Number : 6484-52-2
EC-Number : 228-347-8

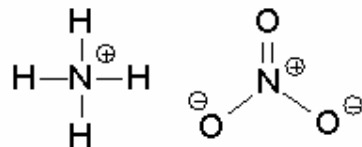
Substance classification :
128120 Ammonium salts
128500 Nitrates

State of aggregation : solid
at 1013 mbar/20 degrees C

Form : Crystals
Colour : colourless

Characterisation :
Oxidizing solid.
The substance itself does not burn, but in contact with combustible substances it increases the risk of fire and can fuel any existing fire substantially.
Very soluble in water.
Solves under cooling.
Hygroscopic.

FORMULA :



H4-N2-O3

Molecular weight : 80,04 g/mol

m

m

EUROPEAN LABELLING

Hazard symbol :



O Oxidizing

Risk phrases (R-phrases) :

R 8

Contact with combustible material may cause fire

R 9

Explosive when mixed with combustible material

Safety advices (S-phrases) :

S 15

Keep away from heat

S 16

Keep away from sources of ignition - No smoking

S 41

In case of fire and/or explosion do not breathe fumes

m

m

m

m

The molecular weight of m oniu mNitrate is 80. The atomic weight of Nitrogen is 14. m
Therefore, with 2 N atoms, the % Nitrogen in mN is $28/80 = 35\%$. So for 100% mNF, the m
Nitrogen content is 35% m

Therefore when fertilizers with a nitrogen content as a result of mN is gi en as 28%, this m
correspon s to 80% mN ($28/35$), an 15.75% mN correspon s to $(15.75/35) = 45\%$ mN. m

m

m

m

m

3 HSA Approach .

Before moving on an approach, the HSA reviewed an extensive list of publications covering aspects of the topic. m

3.1. Literature Review

3.1.1 Hazard and Risk Assessment m

A large number of articles have been published in reputable publications on the assessment of the risks from ammonium nitrate storage. m

Among them: m

- o 'Safety Cases' by King & Lee (1989), which includes a description of how consultation distances are set by HSE, it notes that an upper limit of 300m is set for the permissible storage of bagged ammonium nitrate fertilizer, and looks at the detonation effects of this. m
- o The ILO publication 'Major Hazard Control A Practical Manual' (1993) suggests (in Appendix 8) that the separation distance (in metres) be set based on the formula $[600 (\text{tonnes in stack}/300)^{1/3}]$. m
- o The Loss Prevention Bulletin (Issue 132) has an article on the 'Assessment of 2 Tonnage Risk from Fertiliser in Warehouse Containing Tox2 Materials' by Martinson, M. & Kinsman. m
- o The HSE has published guidance on assessing Safety Reports for Chemical warehouses (including ammonium nitrate) which outlines methods for estimating maximum heat and toxic release rates from warehouse fires. It indicates the use of a 'lift-off' m criterion. m
- o Dechy et al.'s article 'First Lessons of the Toulouse Ammonium Nitrate Disaster 21 Sept 2001, AZF Plant France', (in the Journal of Hazardous Materials (111, 2004, m 131-138)), notes the suspected role of contamination in Toulouse and refers to the new French law of 2002 which made it compulsory to take a value of 10% of the maximum mass stored for the calculation of LEL scenarios. m
- o The INERIS report of October 2001 estimates that between 20 and 120 tonnes of mN were involved in the Toulouse explosion m
- o An Em workshop on mN at Ispra (Feb 2002) reviewed the possible causes of the m Toulouse explosion and in general the hazards associated with mN, as well as some m of the associated problems and concerns. The workshop identified the need to m broaden the Sernesi Directive to include Grades of mNF at less than 28% mN. m
- o Mr. Daniel Adams of HSE's HID has written an article 'The Tox2 Effects from a Fertiliser Involving Ammonium Nitrate'. Although pre-Toulouse, it indicates the assessment should consider both the explosion of the stack and the toxic effects associated with m a fire. It was presented to the Em JRC workshop on ammonium nitrate in 2002. It m describes the results of HSE research work on ammonium nitrate fires and suggests m a likely risk figure for those plants. It states that the frequency of an explosive event is very low. m
- o 'Safety and Security Issues Relating To Low Capacity Storage of AN-Bas Fertilisers' 2 by Marclair and Kordek in the J Haz Mat (m123, 2005, 13-28) gave an overview on m this topic. It also notes the contamination potential of sawdust and wood shavings, m among others. m
- o Martinson & Adams presented a paper to the International Fertilizer Society at a m meeting in London in 2002: 'Ammonium Nitrate : Tox2 Risk from Fertiliser Storage'. m This paper sets out a methodology for 'eloping 'source terms' for modelling fires m in involving mN. It suggests that mH ST is a suitable dispersion code for modelling such m an event. The paper also describes the HSE approach to LEL around mN stores. It m notes the risks can be significant with the 1 cp contour typically being at the 500m. m This paper ("the HSL paper") forms the basis of the HSA approach to modelling the m toxic effects of fire involving mNF. One of the authors, Mr. Graham Martinson was m engaged by the authority in a consultancy role in the development of the metailment aspects of the approach. m
- o An HSL report by GT Martinson on 'The Generation of NO_x from Fertiliser Involving 2 Ammonium Nitrate and Other Chemicals' (2000) gives recombination rates for mN m exposed to thermal radiation. m

m

- The HSE ST 6.4 help system describes the steps required to model a warehouse fire and also suggests that ST is suitable for events in storing ammonium nitrate.
 - The existing HSE approach is described in the *Planning Case Assessment* Chapter 2, Chapter 6, which have been made available on a confidential basis to HSE. The HSE approach is specific to ammonium nitrate whereas the ST approach is suitable for all warehouse scenarios. It is understood that this approach is under review, based on the research in the McKinstry & Mans paper.
 - Kersten & Mak in a presentation in Tokyo in 2004 (i.e. after Toulouse) titled 'Explosion Hazards Of Ammonium Nitrate, How to Assess the Risks?' provide a table of the accident history of ammonium nitrate since 1950 and concludes the hazard is many from toxic effects of fire rather than decomposition of ammonium nitrate to the occurrence of an explosion. The rest of the article focuses on the explosion aspect, looking at deterministic and probabilistic approaches, including the use of LOPE. It notes that the effects of fire dominate the risks because the risk of an explosion event is much considered to be very low. It states that the effects of an explosion can be modelled by comparison with TNT (i.e. the 'TNT method' using Hopkinson's scale law). In looking at the equivalence of ammonium nitrate to TNT it quotes various company figures of 3% for fertilizer grade and 10% for 'technical' grade and a HSE figure of 14%. It concludes that while in general the risks are low, the consequences would be high.
- 3.1.2 Fire Modelling
- The *HSE Handbook of Fire Protection Engineering* (3rd edition) Section 3 Chapters 1 and 11.
 - *Hazards from high pressure gas cylinders*, Ingason & Melander, Fire Safety Journal, 40 (2005) 646-668.
 - *Hazard Assessment for Agricultural Warehouses, the Role of Combustion Products*, Kinsman & Mason, Process Safety and Environmental Protection 79(B3), IChemE, 2001.
 - NF 204: Standard for Smoking and Heating, 2002.
 - *A Review of Methods for Dispersion Following Fires*, Hall et al, Engineering 2005.
 - *The Fire and Explosion at Cory's Warehouse*, HSE 1985.
- 3.1.3 Guidance on NF Storage
- CS18 'Storage & Handling of Ammonium Nitrate' (1986), superseded by INDG 230 (2004), gives guidance on the practices required at sites storing NF.
 - Factory Mutual Data Sheet 7-89 'Ammonium Nitrate and Mixed Fertilisers Containing Ammonium Nitrate' (2000) makes loss prevention recommendations. It suggests using 10% of the total NF quantity, up to a max of 45 tonnes, for explosion modelling.
 - Control of fire-water run-off is described in the HSE publication 'The Control of Fire Water Run-off from CIMAHS Sites to Prevent Environmental Damage' EH70 1995 and in the Fertiliser manufacturers association 'COP For The Prevention of Water Pollution From The Storage and Handling of Solid Fertilisers' (1998).
 - HSE/CEM publication 'Explosion Hazards from Ammonium Nitrate' (1997) gives an overview of accident history and refers to NF 490 for standards on the storage of NF.
 - 'Handbook for the Storage of AN Based Fertilisers', EFM 1992.
 - *Guidance for the Safe Handling and Utilization of Non-Conforming Fertilisers and Related Materials for Fertiliser Producers*, EFM 2004. The advice contained in this document also applies to Blenders.

The HSE, as part of its inspection programme, will ensure good practice is being followed in relation to the storage of NF and the prevention of fire.

3.2 Scenario Selection

Although not itself combustible, when exposed to an external source of heat NF can decompose to various oxides of Nitrogen, usually considered as NO and NO₂.

The Risk Hazard Assessment Database (RHAD) currently under development as part of an m
 Em project on Lm at the request of the Commission, is based on the *Aram s (A2) ntal 2*
Risk Assessment Methodology for Industrial in the context of the Semes II Directive) risk m
 assessment project methodology. m
 For mass solid storage, *Aram s* gives the following critical events m

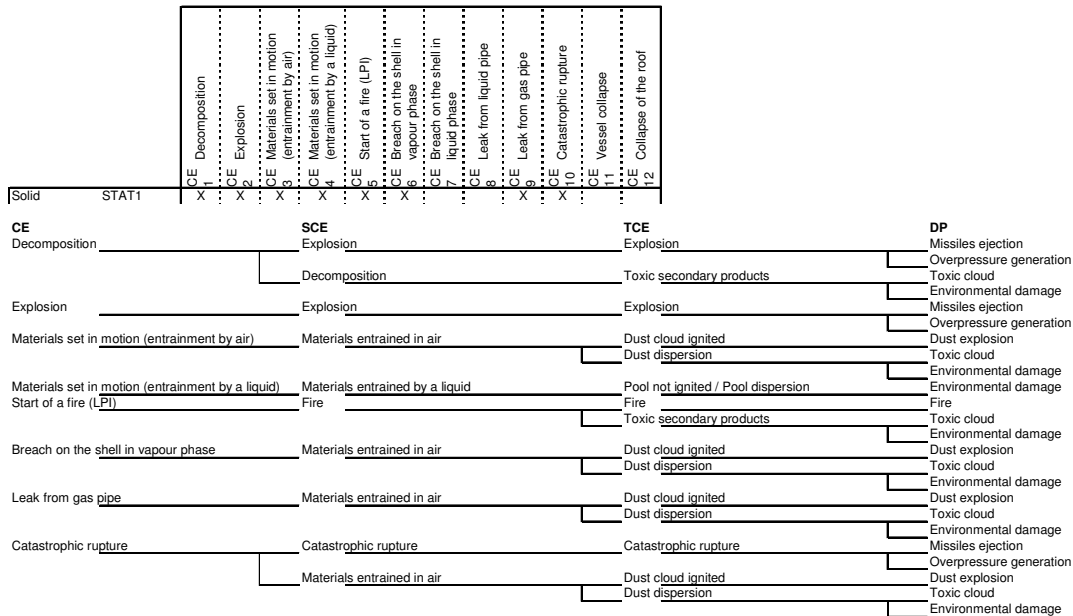
EQ1 Mass solid storage

STAT1 Solid

		CE 1 Decomposition	CE 2 Explosion	CE 3 Materials set in motion (entrainment by air)	CE 4 Materials set in motion (entrainment by a liquid)	CE 5 Start of a fire (LPI)	CE 6 Breach on the shell in vapour phase	CE 7 Breach on the shell in liquid phase	CE 8 Leak from liquid pipe	CE 9 Leak from gas pipe	CE 10 Catastrophic rupture	CE 11 Vessel collapse	CE 12 Collapse of the roof
Mass solid storage	EQ1	X	X	X	X	X							
Solid	STAT1	X	X	X	X	X	X			X	X		
Results		X	X	X	X	X							

m
 m
 The associated Event Tree is given as m

STAT1 Solid



m
 m
 m
 i.e. it suggests the 'dangerous phenomena' to be considered are: m
 m
 o Fire and toxic cloud m

m

- o explosion overpressure, m
- o missiles m
- o environmental damage m

m

Looking briefly at each of these in turn: m

m

3.2.1 Fire and toxic Cloud m

Fire of mNF as such can be ruled out because mNF is not combustible. m

As mNF is not combustible, other sources of combustibles must be looked for. If these are m potentially present, the effects of fire must be considered. The effect of fire on mNF is to m cause it to decompose, releasing toxic gases. Therefore the first consequence to look at is m the off-site dispersion of these gases. m

m

3.2.2 Explosion m

The most plausible (but very unlikely!) route to an explosion is firstly the formation of a m pool of molten mN from a heat input source (e.g. following a very large fire), in a confined m state, followed by initiation of an explosion from the falling of a high-energy object or m some other source. m

Explosion overpressure effects could then be considered m

Just explosion was not included - mN fertilizer dust, being non-combustible in nature, m does not give rise to a dust explosion such as those commonly associated with grain and m organic musts. m

m

3.2.3 Missiles m

While missile generation is possible, the probability in terms of off-site effects is judged to m be small and can therefore usually be neglected in these situations. m

m

3.2.4 Environmental accident m

The most likely MmTTE relates to a fire/fire-water run-off situation. This will only become m an Lm issue for new establishments. m

m

3.3 Established Approaches

Examples of approaches to the modelling of warehouse fires have been described by the m HSE and DNV (mHST help system). m

The HSE approach is a risk-based one, starting out with various fire scenarios of different m size in a 300t stack and looking at the toxic effects of this, and also assigning an explosion m probability to each fire level. Account is taken of security and fire-fighting arrangements in m place at the site. m

m

The DNV/ HSE approach is also risk-based. Depending on the fire-fighting arrangements m in place, probabilities are assigned to fires of different surface area. These can then be m combined in HST and the combined data input to a suitable programme to calculate m the overall risk profile. The DNV approach does not specifically deal with explosion m probability or effects, and is probably more suited to a standard warehouse fire situation. m

m

Neither approach deals with major environmental accidents (MmTTE). m

Both approaches are useful in that they allow the altering of some variables if the risk is m found to be too high (fire response, security etc). m

m

The approach of the HSM is substantially based on the experimental work carried out by m HSL and reported as described above in Section 2.1. m

m

3.4 HSA Model

For the purpose of generating Lm advice, the HSM assumes the following: m

m

- o If mNF, product is of the type set out in annex 1 of the Directive, is treated in the m same way. m

- Modelling of toxic fumes will be to the dangerous dose endpoint. Based on the current HSE DTL for NO₂ on their website, a value of 96000 ppb^m has been set as the dangerous dose, and this is equivalent to 56.6 ppb for 30 minutes.
- For Nitric Oxide a value of 697 ppb is used as the endpoint.
- 300t of NF is equivalent to 41 tonnes of TNT, for explosion modelling purposes.
- The frequency of an explosion is related to the initial fire frequency, and is much more likely from a truck fire than from pallet or mass storage. In the case of pallet or mass storage, a smaller explosion (10% of the mass) is assumed to be more likely (by an order of magnitude) than an explosion involving the whole mass.
- If contaminated NF is also stored at the establishment, a special assessment will be required.

The model uses an initial fire frequency, which can be modified based on the factors such as co-storage with other dangerous substances, security, location, and fire response measures in place, either at the beginning of the assessment or during it. For a typical site, the fire frequency is taken as 6×10^{-4} per warehouse building per year. For simplicity, the whole outside storage area is treated as having the same fire frequency. Event Trees are then created to estimate the likelihood of the various downstream events. These are shown below:

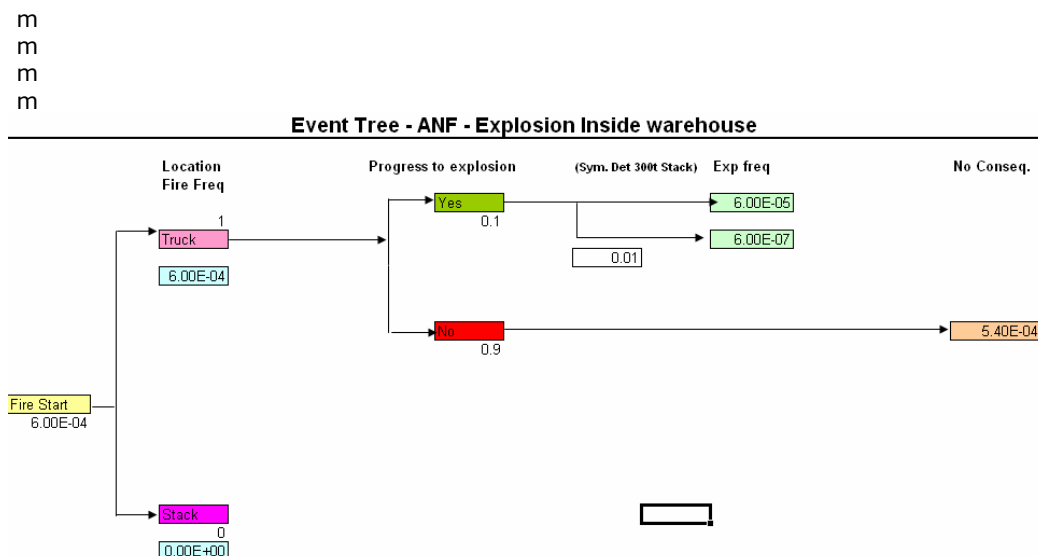
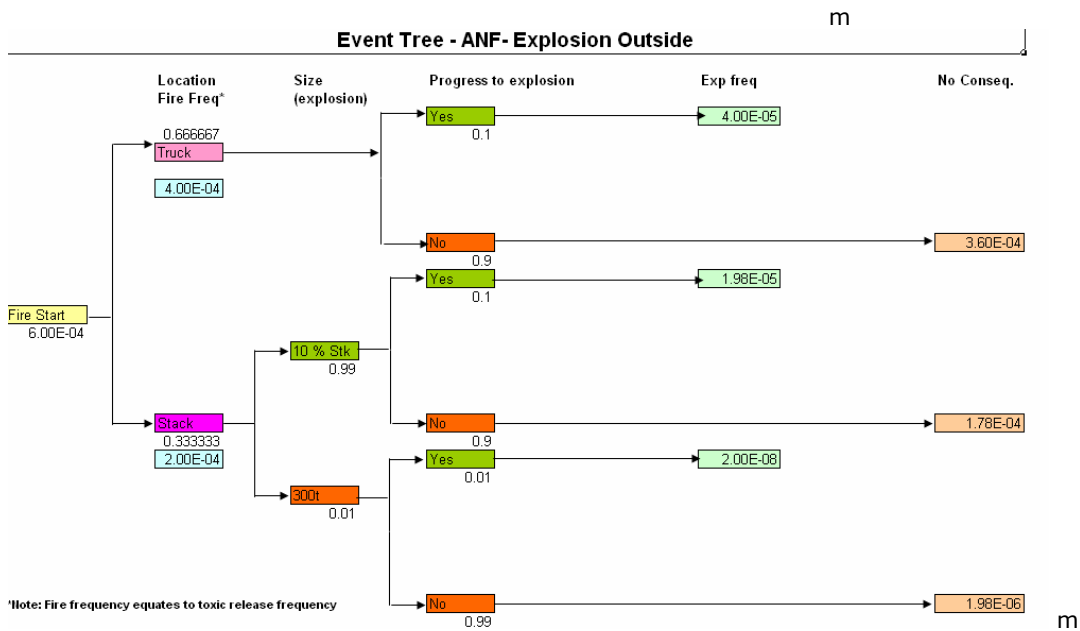
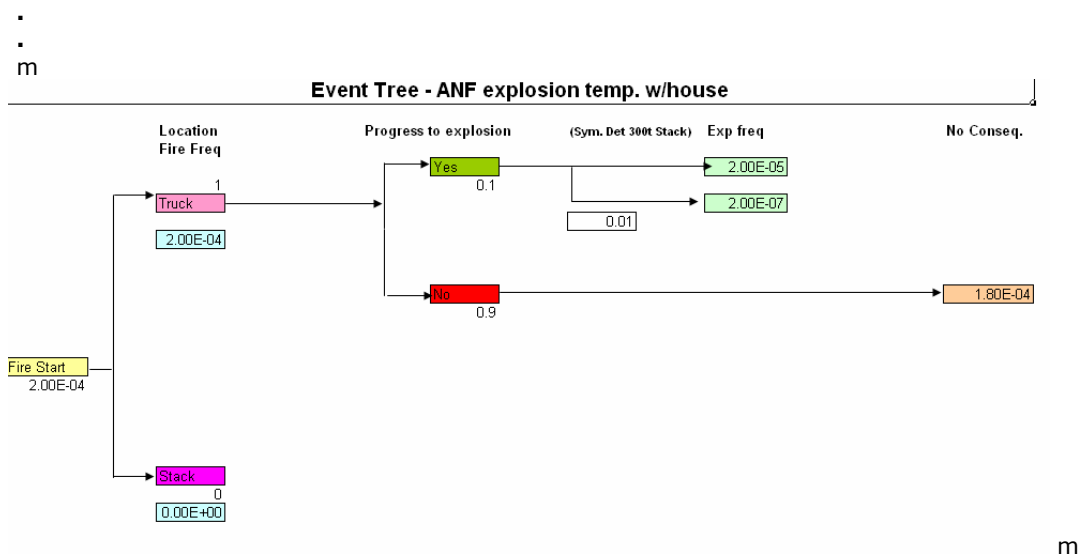


Fig 1 Event Tree for Fire/Explosion in Main Warehouse.



F g 2 Event Tree for F re/Exp os on .n Outs . e Storage Area .



F g 3 Event Tree for F re/Exp os on .n Te . porary Warehouse .

Therefore a typical set-up, in ol ing storage in a warehouse an yar area, has an overall m risk of fire of 1.2×10^{-3} , per year. m

The likelihood of a truck catching fire is consi eremto be twice that for a stack. The m probability that a fire will escalate to an explosion is consi eremto be an or er of m

agnitu e greater for a truck than for a stack. The probability that the quantity in ol emin m the stack explosion is up to 10% of the nominal 300 tonne stack quantity is taken as being m 100 ti es more likely than an ement in ol ing the full 300 tonnes. m

The consequences of a fire in ol ing mN in the outsi e storage area will be greater than m that from the insi e storage. In relation to the generation of fu mes of toxic NO₂ from a fire m insi e a warehouse, the initial fire situation, before the roof collapses, is of most interest, m because of the potential for higher groun -level concentrations. Because of the heat-m

in buoyancy, such concentrations are considered to be insignificant in the event of roof collapse, except in very high wind speed conditions.

The usual local wind-stability pairs of F_2 , $D_{2.5}$, D_5 and D_{10} are initially considered for modelling. Depending on the likelihood of the D_{15} condition, this could also be considered. A buoyancy check is carried out using the Briggs lift-off criterion equation, with the heat content of the plume and release height being required as inputs. In many cases this will allow F_2 conditions (and sometimes $D_{2.5}$ and higher) to be discarded for modelling purposes. In any case the modelling of these scenarios in HST will show negligible consequences.

Although the data from Met Éireann is not exactly broken down into D_5 and D_{10} categories, the '2.5 – 5.6 m/s' D weather can be taken as D_5 and the '>5.6 m/s' D weather as D_{10} , for the purpose of modelling NO/NO₂ releases from fire-in-use NF composition.

Generally, HSM selects 3 scenarios for modelling.

These are:

- Outside Stack Fire
- Outside Truck fire
- Inside Truck Fire

Fire frequency, as described above, is applied to each of these scenarios. Using the rates of NO/NO₂ generation specified in the HSL paper, the extent of the dangerous noise zones are estimated in HST (or other suitable software programme).

This data is then input to Riskplot and the risk zones are visualised on a map of the area.

It is then conservatively assumed that these fires could result in an explosion at the probabilities set out in the event trees above (the existing HSE methodology suggests it is considerably less likely).

Factory Mutual suggest in FM 7/89 that 10% of the stored quantity of NF could be used for explosion modelling, up to a maximum of 45 tonnes of NF. HSE model a maximum of 300 tonnes, based on the limiting stack size.

The HSM has chosen to model the full quantity up to 300t for bagged NF, as set out in the event trees.

In the case of bulk NF, the quantities subject to heating and decomposition will be smaller than 300t, and these are selected for modelling purposes.

The overpressure effects are estimated using the TNT method, up to the dangerous noise of 140mbar. The efficiency of NF follows the HSE approach with 300 tonnes of NF being equivalent to 41 tonnes of TNT (based on 56% equivalence and 25% efficiency).

Given the low probability of explosion, the risk associated with missiles is so low as to be deemed not credible for modelling purposes.

The explosion risk contour extents and frequencies are input to Riskplot where they are summed with the toxic risks to generate the final risk contours that are overlaid on the local map.

m

m

4. Data Collection .

The first step in the actual assessment is to gather the following site-specific information: m

m

Built in Width (m): m	m
Built in Height (m) (end of wall): m	m
Built in Length (m): m	m
Built in Orientation (o): m	m
Location - Urban or Rural: m	m
Site - Security presence m	m
Site - Fencing or perimeter m	m
Construction - Flammable or Non-flammable: m	m
Use - Dedicated or Mixed m	m
Sprinkler System - Yes or No: m	m
Structure - Temporary or Permanent m	m
Roof - Flammable or Non-flammable: m	m
Skylights (location Thermal/GR) m	m
Smoke vents (Location) m	m
Sawdust/other on floors m	m
Storage of Combustibles – pallets and packaging m	m
Locations/Qty of NF Storage m	m
Location of timber structures within storage m	m
Built in m	m
Location of fire sources within storage m	m
Built in m	m
Location of flammable bulk liquid / gas m	m
Storage m	m
Good practice in storage of flammable bulk liquid / gas m	m
300t maximum NF stack limit observed m	m
Max qty NF on truck m	m
% Storage per mnu m(>0 to 100%): m	m
% Fire-separated non-NF areas (0 to m <100%): m	m

m

m

Inspectors of the authority will visit the sites to ensure they are in compliance with m legislation and following good practice as part of Licence generation. They will ensure m the site is taking all necessary measures in relation to Major Accidents Hazards. They will m assess performance in relation to HSE, FM and NF standards, as described above. m Information will also be collected on the level of housekeeping on site, the presence of m timber/sawdust, storage location of transport machinery, height and nature of firewalls m (whether to roof level etc.) The safe storage of pallets and packaging material in particular m will be of interest, as will the fire prevention (including security) and fire-fighting m arrangements. m

The site should comply with the NF storage guidance given in INDG 230. m

m

m