In this edition our site in the spotlight is Jotun Paints, they have kindly provided us with a short article about a recent exercise they held to test specific elements of their COMAH plans.

Jotun Paints (Europe) Ltd is an Upper Tier COMAH site based on the Flixborough Industrial Estate near Scunthorpe. The company holds an annual ‘HSE Day’, with the site operations being closed down for the day so that all employees can receive training in HSE related matters.

On October 16th 2014 almost 200 employees reported to site and were presented with an agenda designed to give the impression of a full day of different activities. However, the HSE Team had planned a full site evacuation test in secret.

The planning was conducted in conjunction with Humberside Fire and Rescue Service (HFRS) and Flixborough Parish Council. Jotun's Off-Site COMAH Plan has designated the Flixborough Village Hall as an emergency rendezvous point for employees in the event of a major accident requiring full site evacuation.

The day began with a welcome from the Managing Director and the QHSE Manager. All employees were then split into 4 groups and led to different locations for the 1st activity which was a video showing of a documentary about the Flixborough Nypro Disaster in 1974.

Two members of the incident team were primed on the morning of the event about the planned evacuation. One to raise the alarm and one to assume the role of Site Main Controller (SMC) without raising suspicion. The scenario decided upon in conjunction with HFRS was a suspected gas leak in the rear yard.

At 9.30am the alarm was raised and all employees reported to the assembly point for roll call. Everyone was safely accounted for within 6 minutes, which was a great achievement due to the increased number of people on site. The fire service were on stand by and sent one appliance to the site, which arrived within 10 minutes of the alarm being raised.

The SMC then instructed the incident team to begin escorting all employees to the Village Hall (a spare key is held in the security hut). This was done in a controlled manner, with employees re-joining their previous group and each group being sent one by one with a team member at the front and rear to control traffic.

4 employees were unable to walk the distance, so the SMC instructed one of his team to drive them up to the hall. The SMC remained at the site with HFRS and communication with the incident team at the hall took place via mobile phone.

During this time the site management crisis team gathered to activate the Crisis Management Plan and HFRS left the site. At approximately 11am the SMC confirmed it was safe to return to site and everyone was then informed that it had been a drill.

The day finished early at 2.30pm and all employees were sent home with a complimentary fleece jacket for the coming winter months.
Command & Control Training

Over the course of the next few months we will be piloting a number of command and control sessions for upper tier COMAH sites. We believe this will be a useful tool for those sites who are due to have their off-site (external) plan tested within a few months.

The sessions will be approximately 2 hours long and will include presentations from HEPS and the four Emergency Responders (Police, Fire, Ambulance and Coastguard). Hopefully this will give the sites an accurate representation of what they should expect the command and control structure to look like in the event of a COMAH incident.

In the next few edition’s of the newsletter we thought it would be useful to understand how important it is for the Emergency Services to be involved in the COMAH planning process. This edition provides an insight into Humberside Fire and Rescue Service’s involvement.

COMAH Sites and Humberside Fire and Rescue Service – Jules Hunt
Civil Protection Manager

Jules Hunt is a Civil Protection Manager for Humberside Fire and Rescue Service, and been in post now for 14 months. Prior to this he was a serving Fire Officer for 25 years, the last 4 years as an ‘on call’ Hazardous materials Officer attending numerous Incidents including some at COMAH sites.

‘Humberside Fire and Rescue Service as a ‘Blue Light’ Category 1 responder have a regulated duty to be involved with the Training, Testing and Planning of an Emergency Response for an Incident occurring at an Upper Tier/Lower Tier COMAH site.

‘One of my references working alongside the Local Authority Emergency Planning Team (Humber Emergency Planning Service) involves work relating to the training, testing and the emergency response for all COMAH sites within the Humberside Fire Area.

Training, testing and learning from experience are essential components in achieving a competent emergency response. It is important for those involved in the plan to have the necessary skills and technical knowledge and members of an Emergency Response Team know what foreseeable scenarios they are likely to encounter and what actions are necessary to bring them under control.

It is vitally important that the Plan identifies the specific emergency procedures for each process setting out the key information for major accident scenarios, potential consequences in different weather conditions, names, properties and quantities of dangerous substances and the locations of any likely major accidents on plant, emergency actions etc. The plan must show planned interfaces between operators and the emergency responders on site including alert/call out and liaison during a response.

The consequences of a major accident at a COMAH site are minimised through the provision of effective COMAH on-site emergency planning and response arrangements and where necessary, dovetailing between these and the off-site emergency arrangements.

By attending Pre Exercise scoping meetings with Representative bodies to discuss credible exercise scenarios a lot of the above can be achieved at the arranged multi agency ‘table top’ exercises, any discrepancy or improvements to the plan can be discussed at the exercise debrief shortly after.
Recent Exercises

**Nippon Gohsei & BP joint exercise (December 2014)**
We used a scenario which was based on a loss of power to the saltend complex which caused power cuts to various sites including Ineos, Nippon Gohsei, BP and Vivergo. Both Nippon and BP’s plans were tested and involved making live 999 calls to activate the COMAH plan. Paying particular attention to the potential and actual outcomes of an incident on the saltend complex.

**OPA Killingholme (February 2015)**
A ship importing fuel to the site developed a leak which resulted in the Humber dyke and adjacent roads being covered in the substance. The main elements tested were the activation of the plan, environmental impacts, command and control, warning & informing arrangements and media response.

**Croda (March 2015)**
A tank became badly damaged and several tonnes of the substance were lost, both onsite and off site toxic sirens were activated. The main elements tested were the activation of the COMAH plan, warning and informing, health messages, communications between all parties and the recovery and clean up.

**Guardian Industries (April 2015)**
During a delivery of LPG problems arose which led to a static build up and a spark which ignited vapours surrounding the LPG tanker. Fires spread across the plant and the heat created a BLEVE on the tanker, creating flying debris across the site and nearby distribution centre. The main elements tested were the activation of the plan, warning and informing, evacuation, communication structures and media management.

**Vivergo fuels (May 2015)**
During maintenance works a catastrophic failure of pipework causes a release of hot ethanol, this ignites and creates a major pool fire engulfing several vehicles and buildings. Thick black smoke drifts off site and creates issues off site on Hull docks and main road. Main elements tested include the plan activation, multi-agency response including command and control, warning and informing and environmental considerations.

Upcoming exercises

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<thead>
<tr>
<th>Site</th>
<th>Date</th>
<th>Council Area</th>
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<tbody>
<tr>
<td>Tata Steel</td>
<td>9th September 2015</td>
<td>North Lincolnshire</td>
</tr>
<tr>
<td>Rawcliffe PSD</td>
<td>14th October 2015</td>
<td>East Riding of Yorkshire Council</td>
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<tr>
<td>Centrica Storage</td>
<td>18th November 2015</td>
<td>East Riding of Yorkshire Council</td>
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<tr>
<td>SSE Aldbrough Gas Storage Facility</td>
<td>9th December 2015</td>
<td>East Riding of Yorkshire Council</td>
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Seveso 3 – Updates

As a follow up to the previous newsletter we are now in a better position to inform you how the new Seveso III regulations will affect us in the Humber. Obviously there are some fairly noticeable changes such as:

- Top tier to upper tier
- Off-site plans to external plans
- Updated list of hazardous substances – CLP regulation
- There are stronger requirements for public information including a duty for lower-tier establishments to provide public information. There are provisions for electronic access to up-to-date public information.
- The domino effects duty is broader, including a duty for members of a domino group to co-operate with neighbouring sites to share relevant information.
- Stronger requirements for the competent authority on inspection.
- After a major accident local authorities must now inform people likely to be affected.

But there are also some changes which will affect the COMAH process, in particular the charging structures that may be adopted. The new regulations stipulate that all designated authorities (emergency services, local authorities, health bodies, government agencies) are able to charge for their participation in the testing of an external COMAH plan to ensure the contents are accurate, complete and practicable and costs cannot cover training opportunities. More details about this will be available shortly.

Also as exercises are developed requests can be made for specific designated authorities to participate. If necessary the local authority can formally request cooperation from a designated authority if its deemed necessary for them to take part in the exercise.

The current COMAH plan templates (Universal plan and Site specific off-site plan) will be reviewed and revised to incorporate the Seveso III changes over the summer. We will aim to transfer the current plans on to the new templates and reissue them by January 2016.

Lets Get ready Website

As mentioned in our last newsletter the HEPS website www.letsgetready.org.uk is now fully up and running. Lots of information can be found including a ‘Lets Get Ready’ industry section which provides details about the COMAH process for both Upper and Lower tier sites..

Other useful information about Business Continuity and the Humber Local Resilience Forum can also be found.

Thank you for taking the time to read through our newsletter. If you have any requests for the Winter edition please get in touch on 01482 3930970r email us at comah@eastriding.gov.uk.

Have a fantastic summer

Kind regards Lisa, Margaret and Becky