

## ICL PUBLIC INQUIRY

[Please note that questions under hearings A,G and H have not been directed to Mr Masterton as these questions do not raise any matter of relevance or materiality to the circumstances which are the subject of the terms of reference]

### Proposed issues /questions :-

#### 46 William Masterton (Inquiry Witness 15)

##### A. LPG deliveries :-

- (a) Paragraph 47 :- Mention is made of standing beside “the man who was delivering LPG.” When did this happen ?
- (b) When did this practise stop in ICL ?
- (c) Did any of the ICL employees receive training/instruction in (i) the procedures to be followed during filling, (ii) the hazards of LPG and (iii) the action to be taken in the event of an emergency ?

##### B. Risk assessments :-

- (a) Paragraph 113 :- Does he accept that the reference in the risk assessment to inspection is misleading if only a limited amount of pipework was to be inspected [ICL/11893-11965]
- (b) Paragraph 124 :- Can he clarify why this risk assessment is referred to ? Does it differ ?
- (c) Paragraph 139-140 :- Is this a reference to the Ives / Tyldesley position in 1988/89.
- (d) The risk assessment at [ICL/011910] dated October 2001 assesses propane gas pipes as a hazard. It assesses the hazard as Frequency Potential 2 (possible) and Severity Potential 6 (Death (several). At [ICL/11914} it had been is recorded that “The propane gas pipes in the Coating Shop are old”. In view of the assessment of risk, what actual action was taken at the time of the assessment in October 2001 ?
- (e) The handwritten risk assessment at [ICL/12333] after the memo dated 18 February 2002 for gas leaks has no risk assessment of “Frequency potential” or “Severity Potential”. Can he explain why ? In addition, it has no entry under the heading of “current assessment” or “action required”. Why ?
- (f) The risk assessment forwarded to ICL insurers on 28 June 2002 [ICL/013317] assesses the Severity Potential of a gas leak as 2 (“minor injury/ies”). Can he explain this ?

- (g) At [ICL/12253] the risk assessment sent to the HSE dated 15 August 2003 by ICL Tech Limited reassesses the Severity Potential of the propane gas pipes as 6 : (“Death (several”). What caused the change between this assessment and the assessment sent to the insurers on 28 June 2002 ?

**C. Involvement with the HSE :**

- (a) On 7 April 1988 he was involved with the HSE. Was any report made thereafter to Stott ? If so, what ?
- (b) What was his knowledge of the drench system proposals ? Can he comment on the memos of Stott to Downie 14/4/88 [ICL/011547] and Stott to Downie 13/4/88 [ICL/011548].

**D. Can he provide any further assistance with regard to the document “the disaster plan” (ICL 12718-12719)**

- E. In a memo to him by Mr Downie on 15 July 1983 [ICL/011491] he indicated that a gas leak was discovered “on a pipe going to ground outside the tank”. Can he elaborate on this incident ?**

**F. What was the mechanism for intimating HSE letters to employees ?**

**G. Was a barrier ever erected around the LPG tank ?**

**H. Did ICL ever control the ground to the west of the gate ? If so, when ?**

## **ICL PUBLIC INQUIRY**

### **Additional Question**

**44 Campbell Downie (Inquiry Witness 1)**

**Add at the end of existing issue C the following :-**

**In relation to the risk assessments prepared can he explain the differences between them ?**