

THE ICL INQUIRY

Chairman: the Right Honourable Lord Gill

Request for information from UKLPG for the purposes of Phase 2 of the Inquiry

- 1 The Inquiry is currently seeking additional information and clarification of a number of aspects in advance of Phase Two and UKLPG's responses to the following are requested by 30 September. UKLPG's answers to these are likely to be made available to other Core Participants, subject to the undertakings of confidentiality, and possibly to one or two other interested person's (subject to confidentiality) prior to Phase Two in the interests of shortening the time that may be absorbed by Phase Two so far as may be practicable.
- 2 This information is requested from UKLPG by close on 30 September so as to ensure the Inquiry timetable is effective.
- 3 It is understood Mr Watson is likely to be the most appropriate person to speak to this information and expand on the information previously provided. The Inquiry requests that there be an opportunity scheduled to see Mr Watson after receipt of the following information and prior to commencement of Phase Two. Mr Watson will be requested to attend Phase 2 for discussions on proposed recommendations.
- 4 There may also be additional information that UKLPG considers would be useful to include for the Inquiry, given the Inquiry's Terms of Reference. If UKLPG wishes to discuss how far the Inquiry considers such information might be relevant, they are invited to do so before undertaking the work which may be involved.
- 5 UKLPG is invited to bear in mind that any proposed recommendations they may consider putting forward to the Inquiry may need to be supported. The document requested might also be used to provide any information relevant to serve this purpose.
- 6 None of the questions which follow should be taken as indicating consideration is being given to any particular potential recommendations at this stage.

Questions

- 7 Following the amalgamation of LP Gas Association (LPGA) and Association of Liquid Gas and Equipment Distributors (ALGED) what are the aim and objectives of UKLPG?
- 8 How is UKLPG governed?

THE ICL INQUIRY

Chairman: the Right Honourable Lord Gill

- 9 What resources are available to UKLPG?
- 10 How many members belong to UKLPG and what is the breakdown of the membership between LPG suppliers and equipment and service suppliers? How many suppliers are not members of UKLPG?
- 11 What 'code of conduct' and/or other requirements does membership of UKLPG impose on an LPG supplier?
- 12 What information does UKLPG hold as to how many LPG suppliers provide LPG in bulk vessels? How many supply specifically to industrial, commercial and retail customers? What is the break down as between nature of customer, if known? What information, if any, does it hold as to the nature and size of industrial/commercial operation/premises supplied to? What, if known, is the geographical distribution of these LPG suppliers?
- 13 How many of these LPG suppliers also provide bulk LPG to domestic customers?
- 14 What is the general process used to develop, agree and validate the Codes of Practice issued by UKLPG (ex LPGA)?
- 15 Please explain the history and evolution of LPG guidance provided by UKLPG (ex LPGA) and how, at any particular time, it might have required particular steps to be taken in connection with (i) the installation of new pipework, and (ii) the inspection of existing pipework? Specifically, can the explanation focus on the obligations which existed upon (i) the LPG supplier, (ii) the occupier of the land and user of the LPG, and (iii) an LPG supplier who took over an existing installation.
- 16 Specifically, can UKLPG clarify whether LPGITA CoP No 22 was available to LPG suppliers and users in draft prior to February 1990, when it states it was 'first printed'? (Note - HS(G)34, which was printed in June 1987, makes reference to CoP No 22)
- 17 In the development of LPGA Codes of Practice (CoP) how have the technical committees managed the content of the CoPs?
- 18 How far have the standards recommended have been set by the members?
- 19 To what extent might the standards be said to reflect the lowest common denominator as put forward/set by members?
- 20 As far as UKLPG is concerned, do the LPGA CoPs represent 'minimum standards' which LPG suppliers should meet? How far do LPG suppliers set their own company standards? How variable are

THE ICL INQUIRY

Chairman: the Right Honourable Lord Gill

these? To what extent do these generally exceed the minimum standards?

- 21 What are UKLPG plans, if any, to develop or change the LPG CoPs in the future?
- 22 What is UKLPG's view of the appropriateness of general self-standard setting and the status of joint guidance between HSE & UKLPG?
- 23 What are the advantages and disadvantages of the current CoP becoming Approved CoP status?
- 24 How far in UKLPG's view does it consider that the present LPG CoP regime lacks clarity for LPG users (non-domestic customers)?
- 25 How accessible in UKLPG's view is the relevant and necessary information to bulk vessel stored LPG non-domestic users? How could this be improved?
- 26 What plans, if any does, UKLPG have to enhance the clarity or availability of LPG guidance to LPG users? Do codes of practice apply to non-members
- 27 What is UKLPG's general guidance on reviewing and updating older and potentially non-compliant LPG installations in later editions of CoPs?
- 28 What if any plans are there to change the current advice on this aspect?
- 29 What information does UKLPG have with respect to historic incidents and risks to bulk LPG users (both domestic and non-domestic)?
- 30 What, if any, information does UKLPG routinely collect on LPG bulk vessel & pipework failures and incidents from its members? How is this information analysed and disseminated for members?
- 31 If UKLPG does not currently do this, what, if any, plans does it have to do this in the future?
- 32 If UKLPG does currently provide this service, how effective is it? What plans are there to improve it?
- 33 How could such information be collated and be made available more widely?
- 34 Historically, what information regarding buried pipework failures (particularly those leading to fires or explosions) was circulated to (or amongst) LPG suppliers?

THE ICL INQUIRY

Chairman: the Right Honourable Lord Gill

- 35 How does UKLPG currently encourage LPG users (particularly SMEs), either directly or through its members, to be aware of and understand LPG hazards and risks, such as possible failure mechanisms, consequences and safeguards associated with, for example, a) integrity of pipework, b) location and sealing of pipework entries into buildings, c) avoiding pipework in unventilated spaces and need for ventilation, d) gas detection and e) preventing ignition?
- 36 What, if any, plans are there to change the current approach?
- 37 What, if any, information does UKLPG have as to the total number of LPG non-domestic sites which may have old metallic LPG service pipework of an unknown or suspect standard?
- 38 To UKLPG's knowledge, what records exist as to the tank, associated pipework and the 'service' pipework in existence at each LPG user site? How might such records be created, maintained, monitored and verified?
- 39 Who was involved in the development of the LPGA CoP 1 Part 3:2006 *'Examination and Inspection'* and Technical Memorandum No 84 *'Inspection and Maintenance of LPG Pipework at Commercial and Industrial Premises'*?
- 40 What has been the experience and feedback received by UKLPG and its members concerning CoP 1, Part 3:2006 in particular the guidance given on the periodic inspection of pipework (section 5.3 and Appendix 1)?
- 41 What plans, if any, does UKLPG have to update CoP 1, Part 3:2006 based on current experience?
- 42 What plans, if any, does UKLPG have to update any other CoP pertaining to LPG pipework based on current experience, for example, CoP No 22?
- 43 What has been the experience and feedback received by UKLPG and its members concerning the risk-based inspection strategy provided in the Technical Memorandum No 84? How effective in UKLPG's view has this strategy been?
- 44 How far has implementation of the guidance contained in the Technical Memorandum No 84 identified situations where older metallic LPG pipework required replacement?
- 45 What is the value of a proof test and a leak test in establishing the integrity of buried pipework where the specification of the pipework is unknown?

THE ICL INQUIRY

Chairman: the Right Honourable Lord Gill

- 46 The Inquiry has received evidence in the course of Phase 1 in relation to this. What is UKLPG's definition of these tests, when and in what circumstances are they expected to be carried out at SME's? What further information and thoughts can UKLPG provide in relation to these tests and the effective monitoring and maintenance of buried pipework so as to promote safety?
- 47 What, if any, plans has UKLPG to promote the life-cycle integrity of LPG installations at non-domestic bulk LPG user sites?
- 48 What would be UKLPG's view of a prescriptive requirement for all non-domestic bulk LPG user sites being subject to periodic life-cycle verification of the LPG installation integrity?
- 49 What would be an appropriate periodic verification and what should it extend to? e.g. the whole LPG installation, including the tank, all pipework and the user's appliances?
- 50 Who might carry this out? e.g. should it be undertaken by an independent competent person (ICP) and/or by a 'competent person' (CORGI registered or its successor), what other suggestions can UKLPG make and why?
- 51 In UKLPG's opinion what is the best method of recording accurately the engineering detail (asset register) of the LPG facilities at bulk user sites?
- 52 What is the best method of maintaining that record and by whom; given the user can change LPG supplier?
- 53 What would UKLPG suggest should be done in order ensure clarity and understanding as to who is responsible for maintaining the integrity of LPG service pipework?
- 54 What view would UKLPG have of a prescriptive requirement to standardise the responsibility across all non-domestic bulk LPG user sites?
- 55 What are the pros and cons in UKLPG's view as to the LPG supplier to be responsible for the tank and either (i) all LPG pipework up to and including the emergency isolation valve on the outside of the premises, (ii) all LPG pipework up to and including the 1st stage pressure regulator or some other location, and if so why? Are there alternative possibilities and what would their pros and cons be?
- 56 What is UKLPG's favoured approach to ensuring that for each bulk LPG user site there is a clear understanding between parties as to their

THE ICL INQUIRY

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respective duties and responsibilities for monitoring and maintaining the integrity of the facilities?

- 57 What systems and resources, if any, does UKLPG have to monitor adverse trends in safety across the LPG supplier sector?
- 58 What systems and resources does UKLPG have (i) to review and amend CoPs and (ii) to issue technical advice quickly?
- 59 In UKLPG's opinion are there any aspects of the domestic bulk LPG market that can be introduced usefully into the non-domestic bulk LPG user sector to improve the life-cycle integrity and reduce the risk of accidents?
- 60 In UKLPG member's experience and within the Terms of Reference of the Inquiry are there any problems or concerns with the application of the health & safety regulations covering bulk LPG facilities at non-domestic user sites; for example with:-
- (i) *Provision and Use of Work Equipment Regulations 1998 (PUWER)*
 - (ii) *Pressure Systems (Safety) Regulations 2000 (PSSR)*
 - (iii) *Pressure Equipment Regulations 1999 (PER)*
 - (iv) *Dangerous Substances and Explosive Atmosphere Regulations 2002 (DSEAR)*.
- 61 If yes, what does UKLPG propose by way of change?
- 62 In UKLPG's view, what are the advantages and disadvantages of 'factories' being exempt from certain aspects of the *Gas Safety (Installations and Use) Regulations 1998 (GSIUR)*?
- 63 Are there any aspects of the *Pipelines Safety Regulations - Design, Construction and Installation of Gas Service Pipes (1996)* which could be applied usefully to non-domestic bulk LPG user sites?
- 64 If the GSIUR was extended to 'factories' and/or there was a requirement for all non-domestic bulk LPG user sites to be inspected periodically by 'competent persons', what might the implications be? What additional needs or concerns might this create?