

The ICL Inquiry

Statement of Case

By

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- 1 The issues which Alistair Douglas McNab (hereinafter referred to as “Mr McNab”) would wish the Inquiry to address are as follows:-**
 - (i) What happened at the premises at Grovepark Mills, Maryhill, Glasgow (hereinafter referred to as “the site”) operated by the ICL group of companies, (hereinafter referred to as “ICL”) on 11 May 2004?
 - (ii) What happened prior to 11 May 2004 which caused or contributed to the cause of the explosion and building collapse?
 - (iii) Could the explosion and building collapse have been prevented?
 - (iv) How could it have been prevented?
 - (v) Why was it not prevented?
 - (vi) What recommendations should be made for the future?

- 2 The aspects of the circumstances leading to the explosion which Mr McNab would wish the Inquiry to explore are as follows:-**

- (i) What action, if any, did ICL take under and in terms of The Pressure Systems Safety Regulations 1990 and/or The Management of Health and Safety Regulations 1992 and/or The Dangerous Substances and Explosive Atmospheres Regulations 2002 (hereinafter referred to respectively as “the 1990 Regulations”; “the 1992 Regulations”; and “the 2002 Regulations”) in relation to the management of safety and related issues at the site and following upon the diagnostic inspection carried out by Mr McNab at the site on 21 January 1992?
- (ii) What liaison or discussion took place between ICL and Calor Gas Limited (hereinafter referred to as “Calor”) concerning the nature and extent of their respective responsibilities under and in terms of Sections 2, 3 and/or 6 of the Health and Safety at Work Act 1974 and under and in terms of the 1990 Regulations; the 1992 Regulations and the 2002 Regulations insofar as they related to the LPG tank/s and associated pipework (hereinafter referred to as the “LPG installation”) at the site and for and between the period December 1989 to the date of the explosion on 11 May 2004, or to the date of decommissioning or removal of the LPG tanks by Calor, whichever was the earlier.
- (iii) What action, if any, did Calor take in relation to the storage and supply (including pipework) of LPG by them to their customers, such as ICL, following and as a result of the LPG explosion on 14 December 1987 at the premises of Lightweight Body Armour Limited, Hinton House, Byfield Road, Woodford, Halse, Northamptonshire (hereinafter referred to as “Lightweight Body Armour”)?
- (iv) Given the multiplicity of LPG guidance, LPG industry standards and LPG-related Codes of Practice and internal Health & Safety

Executive (hereinafter referred to as "HSE") guidance on LPG, in force between 1959 and 2004, was there sufficient clarity with regard to LPG pipework standards (vapour and liquid) and, in particular, with regard to low, medium and high pressure vapour pipework?

- (v) Whether dissemination to HSE Inspectors dealing with LPG issues at the site between 1988 and 2004 of information relative to the background to and causes of the LPG explosion at the premises of Lightweight Body Armour on 14 December 1987, would have been likely to have been of assistance in their considering LPG issues at the site and/or in connection with any advice and any enforcement action they might give/consider following thereon?