OPEN FLOOR HEARING - 17TH OCTOBER 2012

MALCOLM CLEGG

ON BEHALF OF

THE PROTECT WYRE GROUP

REFERENCE NUMBER: 10015247

APPLICATION FOR AN UNDERGROUND NATURAL GAS STORAGE FACILITY
UNDER THE WYRE ESTUARY BY HALITE ENERGY GROUP
PLANNING INSPECTORATE REFERENCE NUMBER: EN030001
My name is Malcolm Clegg, resident of Fleetwood for over seventy years.

I hold a University qualification in Health and Safety Management and for 14 years I was the Fire Safety Manager of a top tier major hazard site with responsibility for Fire Management and Emergency Planning. After leaving Industry I became a visiting lecturer at Loughborough University and the National Fire Service College sharing my experience in Fire Management and Emergency planning.

I have had the opportunity to read the responses to objections included within the Halite IPR note of 3rd July 2012. I am not qualified to offer geological opinion nor that of need for additional capacity of gas storage for the nation, but I am qualified to provide an opinion concerning what I consider to be a grossly inadequate inclusion of safety and security resource within the application.

I have tried to rationalise why best advice offered to the company over the years has consistently been watered down. Could it be inexperience in the field of top tier major hazard site management?

This is a first experience for many of Halite Management team into the field of salt cavern gas storage. The Halite web page provides a brief synopsis of the individual team member’s qualifications which are impressive, particularly in the Engineering disciplines, - mechanical, electrical, construction, and mining. However there are also significant gaps in the collective management experience. I can find no affiliation with the Institution of Fire Engineers, no-one with a quoted professional Health and Safety qualification, no-one reported to have any top tier major hazard site experience and thus no-one experienced in the preparation of a top tier major hazard site emergency plan and with it the experience of providing best standard resource facilities.

Specifically I would like to begin by commenting upon para 3.145 of Halite’s July IPR note, where they suggest that PWG and others, in preparing lists of gas explosion incidents, imply that gas storage is fundamentally unsafe. This is not a true statement.

I have had much experience across a number of COMAH sites and of varying hazard source including chemical, petroleum, and nuclear. I know full well that safe operation at top tier COMAH sites can be achieved, - but it can only be provided where site operator is both experienced and committed to the very highest standards. In examining published lists of major accidents it is a fact that so often the cause can be traced to the removal of a layer of safety provision. All previous Canatxx/Halite applications have included only a relatively low separation distance between wellheads and public footpaths.
It is horrendous to see at this late stage that Halite have now made a decision to extend the scheme just north of the Waste Treatment Plant by including a wellhead that will reduce what was already a poor standard, and provide even lower protection of the public. The new application sees the Wyre Way threaded between well heads with a dangerously low separation between them and members of the public. It will also have a significant effect on the visual impact on that portion of the Wyre Way.

This site just north of the Waste treatment Plant, ensures that walkers, children, employees of the United Utilities and Knott End Golf club can be in positions just yards away from the major hazard source. A copse of trees which stretches to around 600 square yards in size is directly alongside the position and I am reminded of the words of Hyder Consulting describing that heat from a well head jet flame would incinerate anything within 100 yards, and thus rape of the countryside becomes a potential consequence of this inadequate separation.

Halite has produced a lower cost plan for the site by making inappropriate savings on safety provisions. The Titanic designers fell into the same trap.

Fire management at top tier major hazard sites with high fire loading include the need to provide adequate water supplies for fire fighting or cooling. Halite has provided only a very low standard facility by including a water tank. They have not included a fire water pumping facility within their application, at what is a massively high fire load major hazard location. Thus the ability to provide an immediate water cooling facility around wellheads able to protect individuals, both employees and members of the public is ignored. Halite respond by saying that a person would be able to evacuate the area faster than a fire curtain could be initiated (para 3.152). Try saying that to the young mother with her children enjoying a summer stroll along the Wyre Way. And the reality is that a detection system can operate a pressurised water distribution system in seconds.

The original statement by Hyder Consulting, who were commissioned in the period when the applicant used the Company name as Canatxx, was that radiated heat from an ignited wellhead gas escape would be hazardous to humans at up to 250 metres and cause spontaneous ignition at up to 100 metres. Halite now report some redesign of pipe work diameters made subsequent to that initial Hyder definition but make no effort to supply a suggested and modified separation distance to ensure safety to members of the public rightfully using the Wyre Way.(para 3.169)

There is still no reference as to how, within a formal emergency plan, persons walking the Wyre Way could possibly be accounted for in the event of an emergency. The only reference appears to be a comment that details of safety system will be submitted to the Competent Authority under the COMAH Regulations (para 3.172). But since the operator cannot be aware of numbers of members of the
public crossing the site they cannot provide this information, and cannot satisfy a basic requirement of an HSE emergency plan required for all COMAH sites.

These deficiencies are significant and if approved in its present form, this proposal would represent the lowest standard of fire management and site security of any one of twelve top tier major hazard sites that I have worked upon during my career. I would strongly advise that the application be refused in its present form as being totally inadequate in terms of safety and security.

And why is there a real fear that the HSE will become incapable of ensuring public safety by providing an adequate inspection regime. The answer lies within massive government budget cuts. A further £34 in cuts over the next three years on top of the squeezing that has seen the number of HSE Inspectors drop by 18% between 2003 and 2009. And with the local HSE presence at Preston long since closed down, the call is for more self regulation. Within this sorry package we see Halite devoid of Health and Safety professionalism and actively modifying their scheme by reducing safety protection to the public.

Halite attempt to provide a reassurance quote that risk to persons as a consequence of an accident at their proposed installation is less likely than that of being struck by lightening. Well interestingly the US Department of Energy provides its own quote that in recent years between 100 and 300 people are killed and 1500 injured each year by lightening and that worldwide lightening strikes the ground 100 times per second and I would suggest that the Halite re-assurance quote appears pretty meaningless.

In summarising my brief presentation, I draw attention to what is the best advice concerning provision of emergency resource at any top tier major hazard site. With blank page, the operator would be asked to imagine that the very worst and possibly the most unlikely event had already occurred and then be asked to list the facilities he would need to have included within his site design in order to contain the emergency and provide best protection to employees and members of the public alike.

The Halite application does not pass the test. In comparing the offered provisions with those of a dozen other top tier major hazard sites that I have worked upon, the Halite provisions are at the very bottom of any comparison. The local communities are entitled to expect best possible standard and not the very lowest. And finally, by introducing this new wellhead position, with its reduced separation distance, Halite has raised the risk threshold above that included in any of their previous applications, - all of which were refused.