

**Post inspection 4 week communication to ExxonMobil Chemicals Ltd, Fife Ethylene Plant, Beverkae House, Mossmorran, Cowdenbeath KY4 8EP and Braefoot Bay on 20<sup>th</sup> – 21<sup>st</sup> March 2017**

**The Control of Major Accident Hazards Regulations 2015 (COMAH)**

Regulation 25(1) of The Control of Major Accident Hazards Regulations 2015 requires that:

*'The Competent Authority must organise a system of inspections of establishments appropriate to the type of establishment concerned'.*

In accordance with this Regulation the Competent Authority organised and undertook an inspection at your establishments at ExxonMobil Chemicals Ltd, Fife Ethylene Plant, Beverkae House, Mossmorran, Cowdenbeath KY4 8EP and Braefoot Bay on 20<sup>th</sup> – 21<sup>st</sup> March 2017. The primary purpose of this intervention was to discuss the progress that you had made with a number of legal actions, which were raised following the previous mechanical intervention in August 2015. These were focused on the assessment and examination of the Loading Arm Liquid Drain Vessel (B-D-11), and the inspection and maintenance of the active and passive fire protection systems.

Additionally we took the opportunity to discuss the inspection and maintenance strategy for the Braefoot Bay site, a number of aspects of the company's maintenance management system, and the company's assessment of the potential for high temperature hydrogen attack. An agenda was provided to you prior to our visit, which covered the aforementioned topics, and formed the basis for our discussions. The inspection was undertaken by: [REDACTED] HM Inspector (Regulatory) and [REDACTED] HM Specialist Inspector (Mechanical Engineering)]

This email provides initial information on the outcome of that inspection; these were also explained at the conclusion of the inspection. This email outlines the actions that are required to be undertaken by you, the operator of the establishment.

**INSPECTION CONCLUSIONS**

**Legal Actions**

You had made progress with all of the previous actions that were raised which will now be closed:

- **Loading Arm Liquid Drain Vessel B-D-11** , Fitness For Service Assessment (Legal Action 5) and Interim & Thorough Examination Results (Legal Action 6) and
- **Fire Protection Systems, Sample review of inspection & maintenance documentation associated with:** Active Fire Protection Systems at site (Legal Action 8) and Passive Fire Protection Systems at site (Legal Action 7)

**No new legal actions were raised** during this inspection, although, **we do now request additional information** in regards to two topics that were discussed.

**FURTHER INFORMATION REQUIRED**

Specifically this is in relation to:

1. **The condition of small bore BOC Pipework on the Liquid Nitrogen System**

During the inspection of the Braefoot Bay site we observed that a section of small bore pipework was out of alignment and this was subsequently discussed with you. We were informed that the pipework was owned and maintained by BOC and you would raise this with them. On that basis the company are requested to confirm to HSE that this has been communicated to BOC and any resulting work has been completed to rectify this issue by **30<sup>th</sup> June 2017**.

2. **Leak on the fire water supply pipework at the Braefoot Bay Jetty over the past 24 months.**

In regards to the fire water main, that supplies salt water to the deluge system at the Braefoot Bay site, during the inspection we observed that there were two leaks on this pipework. Although you were aware of these, specifically informing us that these had been planned into your maintenance activities, this resulted in some discussion on the management of this pipework and the number of leaks that have been witnessed over recent inspections. On that basis the company are asked to provide further information to confirm the number of leaks that have occurred over the past 24 months on the pipework at the Braefoot Bay Jetty by **30<sup>th</sup> June 2017**.

If upon further consideration of any materials provided during, or subsequent to, the inspection other matters requiring action are identified or the actions outlined in this letter require modification by the Competent Authority I will contact you to outline the additional matters that require your attention.

I will provide you with a report of the inspection as soon as it is completed – this will be within 4 months of the last day of the inspection (19.7.17). It would be useful if you supply the information requested by the due date as it would provide us with an opportunity to consider it prior to the issue of the full inspection report.

Please do not hesitate to contact me if you require clarification of any of the above matters. Please express our thanks to all staff who collaborated in this inspection.

Regards

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### SVC Line detail notes

ME Inspection completed ExxonMobil Chemicals Ltd, Fife Ethylene Plant, Beverkae House, Mossmorran, Cowdenbeath KY4 8EP and Braefoot Bay on 20th – 21st March 2017, 4 week communication sent 19.4.17-see attached. All extant legal actions complied with. Information requested on two matters namely:

1. The condition of small bore BOC Pipework on the Liquid Nitrogen System

During the inspection of the Braefoot Bay site we observed that a section of small bore pipework was out of alignment and this was subsequently discussed with the company. We were informed that the pipework was owned and maintained by BOC and you would raise this with them. On that basis the company are requested to confirm to HSE that this has been communicated to BOC and any resulting work has been completed to rectify this issue by 30th June 2017.

2. Leak on the fire water supply pipework at the Braefoot Bay Jetty over the past 24 months.

In regards to the fire water main, that supplies salt water to the deluge system at the Braefoot Bay site, during the inspection we observed that there were two leaks on this pipework. Although they were aware of these, specifically informing us that these had been planned into your maintenance activities, this resulted in some discussion on the management of this pipework and the number of leaks that have been witnessed over recent inspections. On that basis the company are asked to provide further information to confirm the number of leaks that have occurred over the past 24 months on the pipework at the Braefoot Bay Jetty by 30th June 2017.