

# Methanol update



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# Methanol Pipeline issue: background(1)



- Changes in The Classification, Labelling and Packaging of Chemicals Regulations 2015
- PSR Amendments (secondary legislation):  
<http://www.legislation.gov.uk/ukxi/2015/21/contents/made>
- Previously methanol was classed as toxic now classed as very toxic due to the STOT SE1\* classification.
- Methanol now classified as a PSR Schedule 2 Dangerous Fluid : very toxic fluids with saturated vapour pressure > 0.001 bar at 20 deg C have major accident potential

\* Specific Target Organ Toxicity – single exposure

# Methanol Pipeline issue: background(2)



- Decision made that no action required by Operators until HSE determined the best way forward to minimise burden on industry.
- Survey completed to determine population of methanol pipelines installed to guide HSE actions going forward
- Options paper presented to Energy Division Senior Leadership team – impact assessment & enforcement considerations
- On 10 January 2019, HSE's Regulation Committee approved enforcement approach.
- Planned communications with dutyholders and industry stakeholders (OGUK, PLUG & UKOPA)

## Next steps (1)

Operators are required to take the following action:

- Onshore methanol MAH pipelines - provide a time bound action plan detailing the measures they will take to comply with PSR Regs 20-24.
- Offshore methanol MAH pipelines – provide:
  - a) a time bound action plan detailing the measures they will take to comply with PSR Regs 19-24; and
  - b) where applicable (for Reg. 19 only – provision of ESDV) confirm that they will be submitting an exemption application & proposed submission date.

Exemption requests (by virtue of Reg. 29) must provide an adequate demonstration that the health and safety of persons who are likely to be affected by the exemption will not be prejudiced in consequence of it.

HSE does not consider the granting of exemptions with respect to PSR Regs 20 to 24 for either onshore or offshore methanol pipelines would be appropriate. These regulations relate to major accident hazard identification and risk assessment, emergency response and the requirement for an effective safety management system – all essential for the effective and safe management of a major hazard pipeline.

## Next steps (2)

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### **Letter** (sent / about to be sent)

- Letter to be sent by Director of Energy Division to all onshore and offshore Operators advising of action to be taken

### **Operator response** (by 31 May 2019)

- with time bound action plan detailing the measures to be taken to comply
- (for offshore only) confirming intention (or otherwise) to submit an exemption application (Reg 19 – provision of ESDV) and proposed date of submission of the exemption

### **Exemption Workshop** (provisionally 15 May 2019)

- Plan to run a workshop covering the exemption process and what HSE would expect to see in an exemption application.
- Register interest by 22 March to: [pipelines.methanol@hse.gov.uk](mailto:pipelines.methanol@hse.gov.uk)

# Questions?

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