

## INSPECTION VISIT REPORT – PIR/RSR

ENVIRONMENT  
AGENCY

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<b>FILE NOS:</b> CoMAH
<b>DATE OF REPORT:</b> 21 December 2004
<b>REPORT NO:</b>
<b>INSPECTOR'S SIGNATURE:</b>

<b>OPERATOR:</b> (Name, address)	WH Keys Ltd Hall End Works, Church Lane, West Bromwich, B71 1BN						
<b>PROCESS/PREMISES TYPE:</b>	Bitumen works						
IPC Process Sch Ref	none	PPC Primary Activity Sch Ref	Part B				
<b>PROCESS NAME:</b>	Disinfectant manufacture						
<b>TYPE OF VISIT:</b> (enter no of visits in each category – if other describe under PURPOSE OF VISIT)	TRS Codes	PPC	IPC	COMAH		RSR	
				TT	LT	B3	B4
<b>Enforcement</b> - investigation & enforcement	05						
<b>Incident response</b> - complaints & incidents	06						
<b>Permitting</b> - permits; variations; reviews; transfers; surrenders; COMAH SR assessments; etc	08						
<b>Compliance</b> - programmed inspection; compliance; monitoring	09				2		
<b>PURPOSE OF VISIT:</b>	CoMAH inspection						
<b>INSPECTION VISIT BY:</b>	██████████, ██████████		<b>DATE OF VISIT:</b>	21 Dec 2004			
<b>PERSON(S) SEEN:</b> (Name, Position)	██████████ Works Chemist ██████████ MD						
<b>Reviewed by (TL delete as applicable)</b>							
	<b>RTL (PIR/RSR)</b>	<b>TLEM</b>	<b>EM</b>	<b>Final Inspector check</b>	<b>QC</b>		
<b>Date</b>							
<b>Initial</b>				██████████			

**HEALTH & SAFETY:**

	<i>Issue</i>	<i>Comment</i>
1.	<i>Special risks</i>	fire, toxics
2.	<i>Relevant PIR Risk Assessments</i>	PIR QRAs 1 and 2
3.	<i>Lone worker?</i>	No
4.	<i>Time of day</i>	Office hours
5.	<i>Site familiarity</i>	Unfamiliar, fully accompanied
6.	<i>Unusual conditions / weather leading to increased risks?</i>	Soft ground
7.	<i>Environmental or Occupational Health, COSHH</i>	vague odour of chlorophenols, but not strong enough for concern. Operators wearing BA, but managers standing beside them without. Do not trust to local judgement.
8.	<i>Highest risk event?</i>	Vehicle movement, including on-going confined space exercise by fire brigade.
9.	<i>Learning points</i>	All
<b>RSR</b>	<i>Recorded dose received. <math>\mu</math>Sv</i>	n/a

**ITEMS CARRIED OVER FROM LAST VISIT:**

None

**REPORT:**

WH Keys Ltd has been on the site for over 100 years, producing bitumens. Currently there are around 15 employees. The main business is in producing a range of products from bitumen by cutting it with solvents (eg xylene to produce paints) or forming water based emulsions. Distillation of bitumens is a part A(1) activity under PPC, whilst heating bitumen in any other process is a part B activity. WH Keys position is that they merely keep it warm for mobility and do all of their blending cold. The company has a Part B permission from Sandwell MBC, but this is for releases of solvent rather than bitumen activities.

The CoMAH dangerous substances are related to a new activity on site since 2002. The company produces disinfectants by blending phenolic materials with either aqueous or organic liquids. There is a 'TCP' type product and a 'Jayes Fluid' type product. In 2004 the inventory of toxics breached the Lower Tier threshold and a notification was made. Reading between the lines, the notification was made at the instigation of HSE, rather than due to an awareness of the Regulations. The toxic substances are primarily mixed cresols and the products which contain them. Cresols are also labelled marine pollutant. The main product is a blend of cresol, creosote and light naphtha. Raw materials are received in bulk and dispatched primarily in drums and IBCs.

Audit of Procedures**MAPP.**

The CoMAH notification is recent and the MAPP has not been updated yet with no formalised system for doing so. It is reasonably detailed and covers the requirements of the Regulations, ie organisation/ personnel, major hazards, operational control, management of change, emergency planning, performance monitoring and audit.

Reference is made throughout to the Safety Management System and this was reviewed. Procedures exist and appear clear and detailed. However it became obvious that the whole manual has recently been produced with



the onset of CoMAH, and is not bedded in. Certainly review has yet to occur. An audit of this system should be programmed for 2005, in conjunction with HSE.

#### CoMAH Status

Monthly stock takes are used to monitor inventory. [REDACTED] is aware of the Top Tier threshold at 200 tonnes of toxics and aims to manage well below this. Current stocks run at around 100 tonnes.

The company was reminded that the amendments to CoMAH expected in July 2005 will increase the number of DfE products and lower the threshold, although the aggregation of DfE and toxics will cease.

#### Qualifying Change

Changes to the MAPP are unlikely to be triggered given the high level of the document. There is no formalised procedure for review of new substances brought on site and this relies on the small scale of the operation and [REDACTED] knowledge.

#### Accident Reporting and History

There is no reporting system beyond the accident book. Employees are encouraged to report spills. There is no near-miss system, either for safety or the environment.

#### On-Site Plan

The plan is basically to call the fire brigade and leave site. When the site is unmanned, intruder alarms are activated. Under these circumstances they expect the fire brigade to arrive first and contact the company.

#### Training

There is no specific environmental training. On the job training for the operator of the CoMAH facility is fully documented.

#### Maintenance

This is all carried out by contractors. There is no formal system.

#### Site Inspection

The site has no drainage other than toilets (to septic tank). All storm water, spills etc flow to ground, and have been doing so for a century. There is a great deal of contaminated land, with many old drums stored on bare earth. The cresol tanks are bunded, but not the tanker offloading or drumfilling/ warehouse areas. With the exception of the xylene tank no other site areas are currently bunded.

#### MATTE Scenarios

##### Fire/ Explosion

With the amount of combustible material on-site fire is a likely scenario. This is likely to lead to extensive contamination of land.

##### Firewater

There is no containment for firewater other than the cresol bund, which would soon overtop. All firewater will pass to ground.

##### Land Contamination.

The site must clearly be contaminated already, but any spill on site will pass to ground. No information on underlying ground.

##### Flooding

Site on a hill. Unlikely

All Necessary Measures

A source-pathway-receptor exists for a MATTE scenario. The probability of extensive land contamination in the event of a fire or spill is very high. ANM have not been taken

**CONCLUSIONS / RECOMMENDATIONS:**

Consider Improvement Notice under CoMAH.

Consider impact of Groundwater Regs and Pollution Prevention at rest of site (non-CoMAH)

Conduct audit of procedures and SMS

**CORRECTIVE / PROTECTIVE ACTIONS:**

*(Inspector to sign off when complete)*

	ACTION:	Complete	
		Date	Initial
1.	as detailed above.		

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**REVIEWERS COMMENTS:**