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Checklists for surveying and assessing industrial plant handling materials and substances, which are hazardous to water

Nº 12

Basic structure of safety reports concerning hazards to water



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Advisory Assistance Programme (AAP) of the Federal Ministry for the Environment, Nature Conservation, Building and Nuclear Safety

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Basic structure of safety reports concerning hazards to water

by

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Recommendations of the International River Basin commission on the basic structure of safety reports concerning hazards to water

1. Brief characteristic of the vicinity of the company

The followings should be described from the aspect of their hazard to water:

- Surface water and groundwater in the area, conductors of surface water and groundwater;
- Traffic connections and waterways;
- Existing plants/facilities for the treatment/transporting of potable water or industrial water;
- Pipes and wastewater systems in the vicinity of the plant;
- Identified water preservation areas;
- Other special environmental conditions, e.g. old improperly disposed waste, refuse disposal sites.

2. Description of hazardous substances

The following details must be provided for substances hazardous to water:

- Existing substances hazardous to water (chemical name, trivial name, UN NO., CAS NO.), overview of the substances that could potentially be formed as a result of the reactions caused by accidents;
- Amounts and conditions of the existing/produced substances, particularly:
 - The amounts of substances handled in the plant/plant units that could be released at the simultaneously.
 - Pressure, temperature, concentration, state of aggregation;
- Material data of the existing substances, particularly:
 - general physical material properties of the substances such as the melting temperature, boiling point, vapor pressure, density, solubility,
 - Safety-related material data such as flammability, reactivity with water, decomposition temperature;
- Water Hazard Classes
 - Evaluation of acute toxicity with respect to any danger for human use of the respective water resources and the functionality of the aquatic eco-system;
 - Evaluation of long-term or late commencement of any danger for human use of the respective water resources and the functionality of the aquatic eco-system;
 - Details of the hydrolytic behavior and further reactivity of the substances with water under natural conditions;
 - Existing data on substances that may potentially be formed by reactions.

3. Description of the plant and processes

Descriptions of the technical purpose of the plant, its basic structure and design as well as the fundamentals of the engineering process are the basis for any evaluation of the environmental risk from the plant and processes. The following are to be explicitly noted from the aspect of their hazard to water:

- Processing conditions, as far as they are in direct connection to existing/produced water-polluting substances;
- Supply and disposal of substances to and from the plant (auxiliary materials, wastewater, residual substances, waste);
- Stipulation of safety-relevant plant units (with due consideration of the precautionary principle):
 - Plant units handling special material content,

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- Protective and safety facilities,
- Other plant units relevant to operational safety;
- Description of safety-related plant units (with due consideration of the precautionary principle), in particular:
 - Design features, design of the safety-related plant units,
 - Presentation of the process, process conditions, physical or chemical conversions,
 - Functions and reliability of the safety-related facilities for gauging, controlling and regulating the process.

4. Identification and analysis of possible accidents and means of preventing them (hazard analysis)

The following are to be identified and analyzed from the aspect of their hazard to water:

- Examination of the safety management applied with respect to the handling, treatment, usage, storage, filling and transhipment of water-polluting substances, to ensure a high level of safety for both humans as well as the environment (organizational structure, areas of responsibility, behavior, methods, processes and means of, as well as the existing and/or planned monitoring systems);
- Systematic survey of the safety-related important plant units,
- Assumption of a scenario in which the largest possible amount of the active content of a plant unit is released within the plant vicinity, estimation of the possible damage to humans and the aquatic environment;
- Description of the soil layers and consideration of the possible spread of water-polluting substances in the ground;
- Working out of hypothetical accident scenarios:
 - The circulation as well as the spread of substances in surface waters and groundwater currents, with attention to the interactions with other plants and plant units as well as the domino effects;
 - Examination of the effects on the water path,
 - Determination of the interfaces of organizational measures for hazard control planning;
- Specification of priorities for the organizational and technical precautions and measures to be taken on the basis of the results of the hazard analysis.

5. Protective measures and emergency measures for preventing accidents and limiting damages

With regards to hazards water, precautions and measures should be stipulated to prevent accidental contamination or pollution:

- Identifying and avoiding the release of water-polluting substances into soil, surface and ground waters:
 - Wastewater system (plants for collecting, transporting and treating wastewater);
- Collecting and retaining systems in storage facilities, filling and transhipment of water-polluting substances on land and at sea:
 - Reporting and gauging systems (wastewater system, collecting and retaining system);
- Improving safety management and staff training/education:
 - Safety organization,
 - Development of updated internal emergency plans (alarm and preventive measures/safety plans);
- Fire and explosion prevention:

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- Containment of fire-fighting water,
- Sanitary protection zone,
- Safety intervals;
- Protective facilities provided to counteract the effects of dangerous natural occurrences on plants handling water-polluting substances:
 - Protection against lightning,
 - High water,
 - Extreme weather conditions,
 - Earth-quakes;
- Incidents occurring in the vicinity and affecting the plants or plant units handling water-polluting substances.

6. Results

The results of the survey should establish that, there is no cause for concern in the event of an accident as far as hazards to water is concerned. In particular it is necessary:

- Evaluate the present safety level of the plant;
- Where applicable, identify remaining hazards, and
- Regarding these hazards to develop activities for implementation within the short, medium and long-term period of time.

Checklists for monitoring the implementation of the recommendations

SAFETY REPORT

The legal basis and the general contents of a safety report are contained in the directive 2003/105/EG of the European parliaments and council dated 16 December 2003 for reviewing the council's directive 96/82/EG on the control of major accident risks involving dangerous substances (amended Seveso-II-Directives of the EU).

To successfully undertake such comprehensive inspections it is necessary to apply this directive and exhaust all stipulations defined in the national laws and regulations on plant safety and protection of the rivers and seas of the member states.

Safety reports must be prepared for all sections of establishment that exceed the higher thresholds listed in annex I of the Seveso-II- directives. Sections of establishment includes all plants under the management of an operator, including all infrastructure and storages in an industrial site, where "dangerous substances" are handled or can be produced in case of a failure in the normal operation of a chemical process.

The safety report is based on a comprehensive and systematic survey of all sections of a plant. A very important aspect is the "Identification and analysis of possible accidents and means of preventing them" (risk analysis; compare point 4 of the ICPR/ICPE recommendations). The risk Analysis requires the survey of the safety-relevant plant units in relation to the processes taking place in them.

The results of plant checks based on existing checklists can be used for this purpose. It is strictly stressed that **these checklists only examine the effects on the path taken by water after their disposal.** Therefore, these checklists are only used to check a section of the requirements on safety report.

© Federal Environment Agency Federal Republic of Germany O. Recording the inventory of substances (potential substances) handled in the company. The extended obligations according to article 9 of the Seveso II-directives must be fulfilled when the following thresholds are reached or exceeded using the addition rule.

Remark: Substances or group of substances on the list that appears in the rows with colored background are classified as being hazardous to water.

PART 1 Substances listed (Changed Directives Seveso-II 2003/105/EC)

Dangerous substances	Thresholds acc. to article 9 (t)	Existing thresholds (t)
Ammonium nitrate Fertilizer, which can decompose automatically on its own (see remark 1 of the amended Seveso-II- directives 2003/105/EC)	10.000	
Ammonium nitrate Quality of fertilizer (see remark 2 of the amended Seveso-II- directives)	5.000	
Ammonium nitrate Technical quality (see remark 3 of the amended Seveso-II- directives)	2.500	
Ammonium nitrate Material and fertilizer which are not according to the specification and did not pass the detonation test (see remark 4 of the amended Seveso-II- directives)	50	
Potassium nitrate Mixed fertilizer on the basis of potassium nitrate with potassium nitrate in granulate form (see remark 5 of the amended Seveso-II- directives)	10.000	
Potassium nitrate Mixed fertilizer on the basis of potassium nitrate with potassium nitrate in crystalline form (see remark 6 of the amended Seveso-II- directives)	5.000	
Arsenic pentoxide, Arsenic(V) acid and/or their salt	2	
Arsenic trioxide, Arsenious(III) acid and their salts	0,1	
Bromine	100	
Chlorine	25	
Nickel compounds in inhalable powder form (nickel monoxide, nickel dioxide, nickel sulphide, trinickel disulfide, dinickel trioxide)	1	
Ethyleneimine	20	
Fluorine	20	
Formaldehyde (concentration ☐ 90 %)	50	

Dangerous :	substances	Thresholds acc. to article 9 (t)	Existing thresholds (t)
Hydrogen		50	
Hydrogen chloride (liquefied gas)		250	
Lead alkyls		50	
liquefied extremely flammable gase	s (including LPG and natural gas)	200	
Acetylene		50	
Ethylene oxide		50	
Propylene oxide		50	
Methanol		5.000	
4,4'-Methylene-bis (2-chloroaniline) and/or salt in powder form	0,01	
Methylisocyanate		0,15	
Oxygen		2.000	
Toluylene di-isocyanate		100	
Carbonyl dichloride (Phosgene)		0,75	
Arsenic trihydride (Arsine)		1	
Phosphorous trihydride (Phosphine	r)	1	
Sulphur dichloride		1	
Sulphur trioxide		75	
Polychlorodibenzofurans and Polyc (including TCDD), calculated as TCI		0,001	
The following carcinogenic su above 5 weight per cent:	ibstances with a concentration	0,2	
4-Aminobiphenyl and/or its salt, Benzotrichloride, Benzidine and/or its salt, Bis(chloromethyl)ether, Chloromethyl methylether, 1,2-Dibromoethane, Diethylsulphate, Dimethyl sulphate, Dimethyl sulphate, Dimethylcarbamoyl chloride,	1,2-Dibromo-3-chloropropane, 1,2-Dimethylhydrazine, Dimethylnitrosamine, Hexamethylphosphoric triamid, Hydrazine, 2-Naphthylamine and/or its salt, 4-Nitrodiphenyl and 1,3-Propanesultone		
Petroleum products: a. Gasoline and Naphtha, b. Kerosene (including aviation fuel), c. Gas oil (including diesel fuel, light fuel (heating) oil and gas oil mixture stream)		25.000	

PART 2 Categories of substances and preparations not listed in part 1

I	Dangerous substances	Thresholds acc. to article 9 (t)	Existing thresholds (t)
1.	Very toxic	20	
2.	Toxic	200	
3.	Oxidizing	200	
4.	Explosive If the substance, preparation or matter falls within the UN/ADR-risk sub-class 1.4	200	
5.	Explosive If the substance, preparation or matter falls within the UN/ADR- risk sub-classes 1.1, 1.2, 1.3, 1.5 or 1.6 or within the risk phrases R 2 or R 3	50	
6.	Flammable	50.000	
7 a.	Highly inflammable substances	200	
7 b.	Highly inflammable liquids	50.000	
8.	Extremely Highly inflammable	50	
9.	Dangerous for the environment (in connection with risk phrases):		
	R50: "very toxic for aquatic organisms" (including R 50/53)	200	
	R 51/53: "toxic for aquatic organisms; on a long-term it can have harmful effects on the seas and rivers	500	
10.	Any other substances, not covered by categories mentioned above, in comphrases:	bination with men	tioning risk
	R14: "react violently with water" (including R14/15)	500	
	R29: "contact with water liberates toxic gas"	200	

Are the specified thresholds reached or exceeded and/or is the total sum >/= 1 after applying the addition rule?

Addition rule: check the directive 2003/105/EG OF THE EUROPEAN PARLIAMENT AND COUNCIL dated 16. December 2003 about the amendment of directive 96/82/EG of the council for controlling major accident risks involving dangerous substances (amended Seveso-II- directives of the EU)

1111	orving dangerous susstances (differinced	 of it directives of the 20)
	Yes→Security advice is needed	No \rightarrow security advice is not needed
	Action	No action
Ren	narks:	

1. Does any safety report ex	_		-	
☐ Yes	\square No \rightarrow the list is fin	ished l	Not applical	ble
☐ Action	☐ No action			
1.1.1.Was the safety report subjects?	ected to a check by the	competent a	uthority, specia	alist or other
☐ Yes	□ No	1	Not applical	ble
☐ Action	☐ No action			
Remarks:				
Example of measures:				
 Short-term: Prepare sections 1, 2 and 3 of t international committee for the 	• =	_		the
Medium-term:		1		1 6
 Perform a risk analysis and doc River Basin Commissions for w Complete sections 5 and 6 of th 	writing Safety report,	npliance with	Section of reco	mmendations of
Long-term:	ne salety report			
Reviewing and continual upda	ating of the safety report	whenever the	re are relevant cl	hanges
1.1.2.Are the substances listed in point 1 hazardous to water?				
Remark: Substances or group of substances from the paragraph 1 of the Table with colored background are classified as being hazardous to water. Group of substances without colored background should be checked individually on their risk to water (compare with the Checklist 1)				
☐ Yes→4 ☐ No→	→ the list is finished	☐ Ther	e is no any data	to this→4
☐ Action ☐ No a	action			
Remarks:				
Example of measures:				
Short-term: ● Prepare an overview of the substances with water hazard potential (see Checklist 1).				
1.1.3. Selected prioritized questions on the content and quality of a safety report in respect to endangering of water!				
1.1.4.Was a short characterization	on of the company give	en and the en	vironment des	cribed?
The following should be descri	ibed from the point of	Sufficient	Insufficient	Not available
view of risk to	water			

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aquifer;

Checklist N 12:

Surface and ground water in the area, upper aqueduct and

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Checklist N 12: Basic structure of Safety Reports concerning r	iazards to wa	ater Pag	ge 9 of 13
Traffic connections and waterways			
Pipelines and wastewater system within the factory;			
Defined nature reserve and water protection area			
Other special environmental conditions, contaminated			
-			
site, landfill. Available plants/facilities for treating			
/transportation of drinking or industrial water; other			
economical use of surrounding water resources Remarks:			
Determination of the real risk			
Is the sub-point of the recommendation implemented?			
Yes Partially		No	
		DC 1	0
RC=1 RC=5		RC=1	.0
2. The following information should be made av		T	
The following information should be compiled for	Suffi-	In-	Not available
substances hazardous to water	cient	sufficient	
Substances hazardous to water present (chemical name,			
trivial name, UN-Nr., CAS-Nr.),			
Amount of substances and the condition of the substances			
present, especially			
Amount of substances present in the plant/plant			
components, which can be released at the same			
time,			
Pressure , temperature, concentration, physical			
state			
Water endangerment category of substances present			
Water Risk Index			
The water Risk Index (WRI) corresponds to the degree 6 of the base 10			
equal to the value of WRC-3. That means e.g. a substance of 1000 ton of			
a substance (106 Kg) classified as a WRC-3 substance correspond to a			
WRI equals to 6 (log 10 6), a WRC-2 substance correspond to a WRI			
equals to 5 and a WRC-1 substance correspond to a WRI equals to 4.			
Remarks:			
Determination of the real risk			
Is the sub-point of the recommendation implemented?			
Yes Partially		No	
RC=1 RC=5		RC=10)

Checklist N 12: Ba	asic structure of Safety Reports concerning hazards to water	Page 10 of 13

3. Were the plant and the process described?

The following should be defined explicitly from water	Sufficient	Insufficient	Not available
endangering point of view			
Process conditions, as far as there is a direct connection with			
the available/generated substances hazardous to water;			
Material supply to the plant disposal of waste from the plant			
(auxiliary product, wastewater, residual material, waste);			
Defining significant plant components in regard to their			
technical safety (on the principle of "always being in a state			
of alarm"):			
 Plant components handling special substances, 			
Protection and safety devices,			
 Other plant components necessary for safe operation 			
of the plant;			
Description of the safety relevant plant components (on the			
principle of "always being in a state of alarm"), especially:			
 Constructive characteristic features, designing the 			
safety relevant plant components,			
 Description of process, process conditions, physical 			
and chemical conversions,			
 Function and reliability of safety relevant devices for 			
measuring, controlling, regulating.			

Remarks:

Determination of the real risk				
Is the sub-point of the recommendation implemented?				
Yes	Partially	No		
RC=1	RC=5	RC=10		

4. Were a systematic analysis of possible accidents conducted and the means of preventing them determined?

The following should be defined and analyzed from	Sufficient	Insufficient	Not available
water endangering point of view			
Examining the safety management in respect to operation,			
treatment, storage, filling and transshipment of			
substances hazardous to water, so as to guarantee a high			
level of protection of man and environment			
(organizational structure, areas of responsibility, methods			
procedure, processes and material as well as existing			

Checklist N 12: Basic structure of Safety Reports concerning hazards to water			e 11 of 13
	T T		T
and/or foreseen monitoring systems);			
Systematic examination of significant plant components in			
respect of their technical safety,			
Assuming accidental scenarios whereby the highest			
possible harmful content of a plant component within a			
plant complex is released, Assessment of possible danger			
for man and aquatic environment;			
 Discharge of substances as well as their spread in 			
surface water bodies and groundwater streams in			
respect to the interactions with other plant and			
plant components as well as the domino effects,			
Conducting a survey of the effects on water path,			
 Determine the interface between organizational 			
measures and hazard prevention planning;			
Define priorities for organizational and technical			
precautions and measures to be taken on the basis of the			
results of the risk analysis.			
Remarks:			

Determination of the real risk			
Is the sub-point of the recommendation implemented?			
Yes	Partially	No	
RC=1	RC=5	RC=10	

5. Were the preventive and emergency measures for accident prevention and limitation of consequences of accidents described?

Precautions and measures for the prevention of	Sufficient	Insufficient	Not available
accidental pollution of rivers and seas should be			
defined from water endangering point of view			
Detecting and preventing the discharge of substances			
hazardous to water into the surface of water bodies, into			
the ground or into the groundwater:			
 Wastewater system (facilities for collecting 			
wastewater, transporting and treatment); see			
Checklist 6 "Split-flows wastewater"			
Description of the soil layer and assessing of possible			
spread of substances hazardous to water in the ground;			
see Checklist 5 "Sealing systems"			
Collecting and containing facilities for storage, filling and			
transshipment of substances hazardous to water on a site			

Checkl	ist N 12: Basic structure of Safety Reports concerning	hazards to wa	ater Pag	e 12 of 13
and or	n the sea: see Checklist 13 "Storage facilities"			
	revention and prevention of explosion:			
	Containing of fire fighting water, see checklist 8			
	"Fire prevention strategy"			
>	Protected area, see Checklist 13 "Storage facilities"			
>	Safe distance; see Checklist 13 "Storage facilities"			
Safety	devices against the effects of dangerous natural			
_	nts on plants handling substances hazardous to			
water:				
	Lightning protection, see Checklist 13 "Storage facilities"			
>	Flooding, see checklist 11 "Flooding"			
>	extreme weather situations,			
>	Earthquakes;			
Remai	·ks:			
Dete	rmination of the real risk			
Is the	sub-point of the recommendation implemented?			
	Yes Partially		No	1
	RC=1 RC=5		LJ RC=∶	10
	NC-1 NC-3		NC-	10
6. W	hich results were formulated in the safety re	port?		
There	should be no case of accident which can endanger wa	er Sufficie	nt Insufficient	Not available
as a	result of this check. The following should be checked i	n		
	the safety report:			
whethe	er the existing technical safety level of the plant has been			
assesse	ed according to west European standards;			
Wheth	er the remaining dangers were mentioned and as a result			
	medium- and long-term precautions and measures to be			
realize	d were defined.			
Dit				
	rmination of the real risk			
is the	e sub-point of the recommendation implemented? Yes Partially		No	
	RC=1 RC=5 RC=10			0
1.1.5. Which results were formulated after inspection by the competent authority, specialists or				
1.1.).	Which results were formulated after inspection by	the compe	tent authority,	specialists or
1.1.5.	Which results were formulated after inspection by other experts? Action	_	ection	specialists or

Chec	klist N 12:	Basic structure of S	Safety Reports concerning hazards to wat	Page 13 of 13
	Short-term	measure		
	Medium-te	rm measure		
	Long-term	measure		
Rem	arks:			
9	Summery o	of the Checklist		
	-	oint of the mendation	Possible Risk category	Risk categories

Sub-point of the Recommendation	Possible Risk category	Risk categories
1	1 / 5 / 10	
2	1 / 5 / 10	
3	1 / 5 / 10	
4	1 / 5 / 10	
5	1 / 5 / 10	
6	1 / 5 / 10	

Average **R**isk of the **C**hecklist **(ARC)**