TESTING OF EMERGENCY PROCEDURES AT UNMANNED PETROL FILLING STATIONS

Petroleum (Consolidation) Regulations 2014
Dangerous Substances and Explosive Atmospheres Regulations 2002

Guidance to PEA’s on their role when testing the emergency procures in place on Petrol Filling Stations operating in an unmanned mode of operation.

FOREWORD

This guidance forms part of a series of PETELs issued as part of the PELG-PETEL series from 2012 onwards by the Petroleum Enforcement Liaison Group (PELG), a health and safety advisory committee hosted by the Energy Institute. It comprises representatives of the Retail Petroleum Industry, the Petroleum Enforcement Authorities (PEAs) and the Environment Agency, with technical support from the Health and Safety Executive.

PETELs are a mechanism for PELG to disseminate advice, guidance and good practice with the purpose of: -

☐ facilitating appropriate and consistent enforcement by PEAs; and/or
☐ advising duty-holders on how to comply with the law.

IMPORTANT DISCLAIMER

This guidance has been produced and reviewed as described in the foreword.

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OVERVIEW

Sites which operate with an unmanned mode of operation are required to ensure measures are in place to monitor and control forecourts and to provide and implement emergency protocols. This PETEL is designed to allow Petroleum Enforcement Authorities to test the emergency procedures at all versions of petrol filling stations operating on an unmanned basis, in line with the categories and recommendations detailed in the Red Guide.

The following guidance provides an overview of the type of unmanned modes of operation and testing protocols to be applied.

APPLICATION

Separate instructions are provided under each heading, with the exception of UMS3 & UMS4 which are combined. Please note a ‘TEST’ sign is available in Annex A, this will be applicable when testing sites which fall under categories UMS2 (where applicable), UMS3 and UMS4.

Petroleum Enforcement Authorities should familiarise themselves with the mode of operation and select the appropriate test.

The intention is for the testing procedure to be used at the initial visit after the commissioning of the site. It is not intended to be used at every routine visit unless there are concerns that the system is not working.

Note: Not all sites which operate on an unmanned basis will apply the same monitoring systems, therefore it is advised that for companies who have a Primary Authority partnership, additional information and guidance should be taken from the relevant section of the Primary Authority Register.
PART 1: CATEGORIES FOR UNMANNED MODES OF OPERATION

- **UMS1** - Unmanned petrol filling stations that serve a community, where local appointed person(s) take responsibility for the operation.

- **UMS2** - Petrol filling stations that normally operate as ‘Attended’ or ‘Attended Self-Service’ but change to ‘Unmanned’ at times of low volume of fuel sales.
  
  Note: This will normally operate during late evening and overnight when the forecourt shop is closed. A limited number of dispensing positions are made available and staff are not immediately available; they may be monitored remotely by CCTV or direct vision from adjacent premises.

- **UMS3** – Unmanned petrol filling stations that serve a community but are operated on a commercial basis.
  
  Note: Typically, these sites would not be viable should they incur the cost of regular staff due to the low volume of fuel sales. As a guide their fuel sales will be below 1,250,000 L of fuel per annum of which petrol sales do not exceed 650,000 L per year. * These figures are as of January 2018 and may be subject to change due to future market trends.

- **UMS4** – Continuously unmanned commercially operated petrol filling stations with high volume of fuel sales.
PART 2: TESTING PROTOCOL FOR UMS 1

TEST: UMS1 – Unmanned petrol filling stations that serve a community, where local appointed person(s) take responsibility for the operation.

AIM: To test the emergency procedure in place and ensure the locally appointed person will attend site within the timescales specified in Table 6 of the Red Guide.

INFORMATION: Sites which use this mode of operation will have an appointed person(s) who are trained to provide assistance in an emergency, when summoned. The appointed person(s) would be expected to attend within 5 min or the time frame identified on a risk assessment giving justification for extending the response time, in line with Table 6 of the Red Guide.

TEST NOTES:

☐ Prior to undertaking this test, Petroleum Inspectors (PI) should ascertain the emergency response time for the site. Where a physical response will be in excess of 5 min, justifications should have been provided and deemed to be acceptable.

☐ Sites with this mode of operation will tend not be monitored by CCTV or direct vision as this would not be cost effective. Sites may have an accessible telephone with instructions on how to contact a responsible person or directions to the location of a responsible person which the Petroleum Inspector (PI) should utilise to summon the appointed person(s).

TEST PROCEDURE:

☐ Enter site and proceed to the accessible telephone/signage.

☐ Either use the telephone to summon, or follow the instructions to locate the competent person.

☐ Identify yourself to the competent person, inform them a test is being carried out and ask them to meet you on the forecourt.

☐ Begin to time the competent person(s), who should arrive on the forecourt within 5 min, or as identified within the risk assessment for an extension.

RESULT OF TEST AND FEEDBACK:

☐ If the responder fails to answer the phone (if available), within a reasonable time, replace the receiver and investigate if there are any alternatives methods to raise the alarm. Should there be a notice giving instructions to the location of a responder, follow instructions to discover whether the person is readily available to deal with an incident.

☐ After all attempts to contact the appointed person have been undertaken, should the PI be of the opinion the site will not be able to fulfil any emergency procedures they may require the forecourt to be closed or to operate in attended service until such time as all measures are in place to ensure the emergency procedures can be fulfilled. This may be achieved by local agreement, or via the issue of a prohibition notice where agreement cannot be reached.

☐ If all of the aspects of the system have functioned as they should, the test will have deemed to have been ‘passed’.

☐ If the company has a Primary Authority partnership, the PI may provide feedback/notation via the partnership page on the Primary Authority Register website.
PART 3: TESTING PROTOCOL FOR UMS 2

TEST: UMS2 - Petrol filling stations that normally operate as ‘Attended’ or ‘Attended Self-Service’ but change to ‘Unmanned’ at times of low volume of fuel sales.

AIM: To test the emergency procedure in place and ensure the competent person will attend site when summoned within 5 min or the time frame identified on a risk assessment giving justification for extending the response time, in line with Table 6 of the Red Guide. Where applicable this test will also be used to demonstrate the monitoring and alarm receiving centre (ARC) has adequate control of the operation of the petrol forecourt and can summon a competent person to attend the forecourt in the event of an incident.

INFORMATION: Sites which use this mode of operation may use an Alarm Receiving Centre (ARC) or have a dedicated person(s) monitoring the site via live CCTV or direct vision from an adjacent premises. For sites utilising an ARC please see the information section under the UMS3 & UMS4 heading for further details on how the system operates.

TEST NOTES:

- Prior to undertaking this test, Petroleum Inspectors (PI) should ascertain the emergency response time for the site. Where a physical response will be in excess of 5 min, justifications should have been provided and deemed to be acceptable.
- Where a site is monitored by an ARC, before attending the forecourt to carry out the test, the PI must prepare a sheet of paper (minimum size A4) with the word ‘TEST’ either printed or clearly written on it, in as bold a script as possible. (See example in Annex A, which may be used).
- To be as realistic as possible, the test should be unannounced.
- Regardless of whether the store is monitored via an ARC or by a nearby property (generally shop store) the test must be carried out at a time when there are no staff present on the forecourt.
- A person walking on the forecourt without a vehicle or the attempt to dispense petrol without the presence of a vehicle may trigger an alarm at the ARC, therefore to make the test realistic we would ask that the PI does not initially bring their car on to the forecourt. Please take care to comply with any parking arrangements as a fine may result in non-compliance of the time allocation / payment etc. Once the initial contact has been made with a colleague via the intuitive system, the vehicle may then be moved onto the forecourt for the rest of the visit if required.
- Where sites operate with an ARC, the use of high visibility clothing for the duration of the test is at the discretion of the officer and should be subject to a dynamic risk assessment. It is advisable to wear protective gloves for the test involving dispensers.
- Companies have been consulted and aware PIs may need to use break glass entry points on emergency cabinets.

TEST PROCEDURES:

1) Site with monitoring via live CCTV (non-intuitive)
   - Enter site and proceed to the emergency cabinet
   - Access cabinet and use the phone line to summon the competent person (this should be via an easily identifiable speed dial)
   - Identify yourself to the competent person, inform them a test is being carried out and ask them to meet you on the forecourt by the emergency box. (Sufficient lighting would be afforded to this element of the forecourt, therefore for safety reasons it is advisable to remain in this position for out of hours tests).
   - Begin to time the competent person(s), who should arrive within 5 min, or as identified within the risk assessment for an extension.
2) Site with monitoring via ARC with intuitive analytical CCTV or direct vision from an adjacent premises:
- Walk on to the forecourt with ‘TEST’ sign immediately available and stand adjacent an unoccupied dispensing position.
- Lift one of the petrol nozzles from the dispenser and carefully place on the ground.
- Hold the “TEST” sign up so that it is visible to the CCTV cameras (the CCTV may be via a small black dome camera mounted under the canopy).
- Alternatively hold sign up in direction of competent person in adjacent premises.
- Please stay in position at the pump and continue to hold up the sign until you hear a tannoy announcement (this will allow the ARC to distinguish between a test situation and a ‘false alarm’ such as a colleague checking / cleaning the pumps etc.), or until the person watching the site has acknowledged the test.
- On seeing the “TEST” sign the ARC will give an instruction over the forecourt speaker system and activate a system to alert the duty competent person that they must attend the petrol forecourt to deal with an incident.
- Once acknowledgement has been received begin to time the response of the competent person. This protocol negates the need to break the glass bolt to access the emergency phone.
- The competent person should arrive on the forecourt within 5 min, or as identified within the risk assessment for an extension.

RESULT OF TEST AND FEEDBACK:

1) Site with monitoring via live CCTV
- If the site fail to answer the customer emergency phone line within a reasonable time, replace the receiver and proceed to the main store to investigate.
- Should the PI then be of the opinion the site will not be able to fulfil any emergency procedures they may require the forecourt to be closed or operate as attended or attended self service rather than unmanned during the times when it would usually be unattended. Should this occur, the site is not to revert back to unattended service until all measures are in place to ensure the emergency procedures can be fulfilled. This may be achieved by local agreement, or via the issue of a prohibition notice where agreement cannot be reached.

2) Site with monitoring via an ARC with intuitive analytical CCTV or direct vision from an adjacent premises:
- If the ARC fails to provide message over tannoy after a reasonable time, proceed to the emergency cabinet.
- Open the emergency cabinet and contact the ARC and ask them to contact the competent person. Once summoned, begin timing the response.
- Once this process has been fulfilled, investigate the cause of the failure. If the PI is of the opinion the system will not function as it should and an emergency would not be actioned appropriately, the site will need to close until attended self-service resumes. This may be achieved by local agreement, or via the issue of a prohibition notice where agreement cannot be reached. The site is not to revert back to unattended service until all measures are in place to ensure the emergency procedures can be fulfilled.
- OR
- If there is no response from the adjacent premises which is within direct line of vision, the PI is to investigate cause of the failure. If the PI is of the opinion sufficient coverage cannot be assured and an emergency would not be actioned appropriately the site will need to close or
operate as attended or attended self service rather than unmanned during the times when it would usually be unattended. This may be achieved by local agreement, or via the issue of a prohibition notice where agreement cannot be reached. The site is not to revert back to unattended service until all measures are in place to ensure the emergency procedures can be fulfilled.

☐ If all of the aspects of the system have functioned as they should, the test will have deemed to have been ‘passed’.

☐ If the company has a Primary Authority partnership, the PI may provide feedback/notification via the partnership page on the Primary Authority Register website.
PART 4: TESTING PROTOCOL FOR UMS 3 & UMS 4

TEST: UMS3 – Unmanned petrol filling stations that serve a community but are operated on a commercial basis & UMS4 – Continuously unmanned commercially operated petrol filling stations with high volume of fuel sales.

AIM: To prove that the monitoring and alarm receiving centre (ARC) has adequate control of the operation of the petrol forecourt and can summon a competent person to attend the forecourt in the event of an incident, within 5 min or the time frame identified on a risk assessment giving justification for extending the response time, in line with Table 6 of the Red Guide.

INFORMATION: The intuitive CCTV system is designed to cause an alarm when there is a potential non-compliance or emergency event occurring on the petrol forecourt. Once an alarm has been activated, an operative at the ARC will have real time vision of the site, and a range of measures to address any issues that they are observing:

1. Do nothing, because they can see that the alarm was triggered by a situation that does not require any action.
2. Speak to and where necessary give instructions to the person(s) on the forecourt via the forecourt speaker system.
3. Deactivate one or more of the dispensers on the forecourt.
4. Summon a competent person to attend the forecourt to deal with the incident.
5. Call the local emergency services.

TEST NOTES:

- Prior to undertaking this test, Petroleum Inspectors (PI) should ascertain the emergency response time for the site. Where a physical response will be in excess of 5 min, justificatons should have been provided and deemed to be acceptable.
- Before attending the forecourt to carry out the test, the PI must prepare a sheet of paper (minimum size A4) with the word ‘TEST’ either printed or clearly written on it, in as bold a script as possible. (See example in Annex A, which may be used).
- To be as realistic as possible, the test should be unannounced.
- The test must be carried out at a time when there are no staff or contractors present on the forecourt, as the ARC may not have full control under these circumstances.
- A person walking on the forecourt without a vehicle or the attempt to dispense petrol without the presence of a vehicle may trigger an alarm at the ARC, therefore to make the test realistic we would ask that the PI does not initially bring their car on to the forecourt. Please take care to comply with any parking arrangements as a fine may result in non-compliance of the time allocation / payment etc. Once the initial contact has been made with a colleague via the intuitive system, the vehicle may then be moved onto the forecourt for the rest of the visit if required.
- The use of high visibility clothing for the duration of the test is at the discretion of the officer and should be subject to a dynamic risk assessment. It is advisable to wear protective gloves for the test involving dispensers.

TEST PROCEDURE:

- Walk on to the forecourt with the ‘TEST’ sign immediately available and stand adjacent an unoccupied dispensing position.
- Lift one of the petrol nozzles from the dispenser and carefully place on the ground.
- Hold the “TEST” sign up so that it is visible to the CCTV cameras (the CCTV may be via a small black dome camera mounted under the canopy).
- Please stay in position at the pump and continue to hold up the sign until you hear a tannoy announcement (this will allow the ARC to distinguish between a testing officer and a ‘false alarm’ such as a colleague checking / cleaning the pumps etc.).
On seeing the “TEST” sign the ARC will give an instruction over the forecourt speaker system and activate a system to alert the duty competent person that they must attend the petrol forecourt to deal with an incident.

Upon hearing the announcement, begin to time the response of the competent person. This protocol negates the need to break the glass bolt to access the emergency phone.

The competent person should arrive on the forecourt within 5 min, or as identified within the risk assessment for an extension.

RESULT OF TEST AND FEEDBACK:

If the ARC fails to provide a message over the tannoy after a reasonable time, proceed to the emergency cabinet.

Open the emergency cabinet, contact the ARC and ask them to contact the competent person. Once summoned, begin timing the response.

Once this process has been fulfilled investigate cause of the failure. If the PI is of the opinion the system will not function as it should and an emergency would not be actioned appropriately the site will need to close or be operated as attended until attended self-service resumes. This may be achieved by local agreement, or via the issue of a prohibition notice where agreement cannot be reached. The site is not to revert back to unattended service until all measures are in place to ensure the emergency procedures can be fulfilled.

If all of the aspects of the system have functioned as they should, the test will have deemed to have been ‘passed’.

If the company has a Primary Authority partnership, the PI may provide feedback/notification via the partnership page on the Primary Authority Register website.
ANNEX A

TEST