




## “Temporary permanent storage”

TWG 2- meeting 2018  
The Hague

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## Temporary – permanent storage – what do we mean?

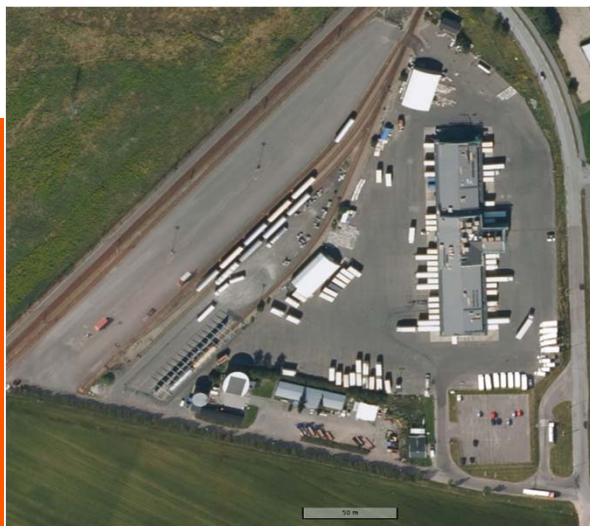
- Borderline between transport and storage
  - Article 2 c: shall not comply to the transport of dangerous substances and directly related intermediate temporary storage by rail, internal waterways, sea or air, outside the establishments.... Including loading and unloading and transport to and from another means of transport.....
- Because of previous borderline discussions the Norwegian guideline says:
  - If dangerous goods is located in a geographical area designated for temporary storage or reloading of chemicals, this is regarded as under the Seveso regulation if the maximum amounts are equal to or above the threshold values in Appendix I.

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- With this we wanted to make sure that companies were not speculating in long term storage in transport tanks in order to avoid getting under the Seveso regulation
  - And we did have, and still have companies who «speculate» in this.
  - The transport tanks are present on site until they have been emptied, and after emptying they are immediately replaced with full transport tanks....

## Why do we bother???

- The transport sites have:
  - Different technical standards
  - Different risk for 3. party
  - No information to the public
  - Is not dealt with in land use planning in the same way as Seveso sites, incorrect consideration zones, inspite the fact that they represent a larger risk.

This means that it pays to avoid the regulations, and that is unfair to the companies who do what they are expected to do.

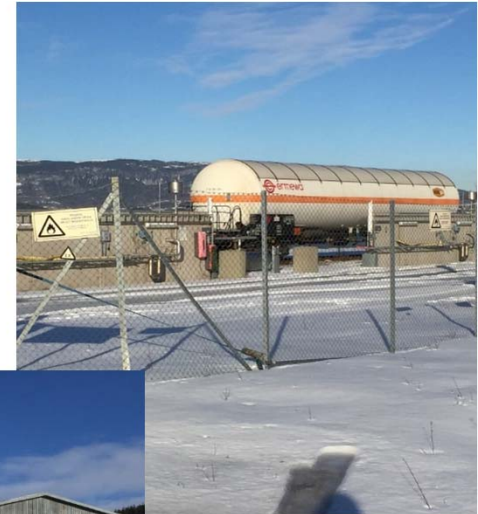


## Short description of sites

- Two sites in Norway – LPG transported by rail from Sweden
- 2 railway tanks always on site
  - Total permitted amount approximately 100 tonnes LPG per site
- Activity on site:
  - Reloading of LNG from railway tanks to smaller tanks
- Both sites lower tier (by our definition...)
- Establishment claimed that this was transport of dangerous goods, not storage under Seveso.

## Follow up of notice of concern – site 1

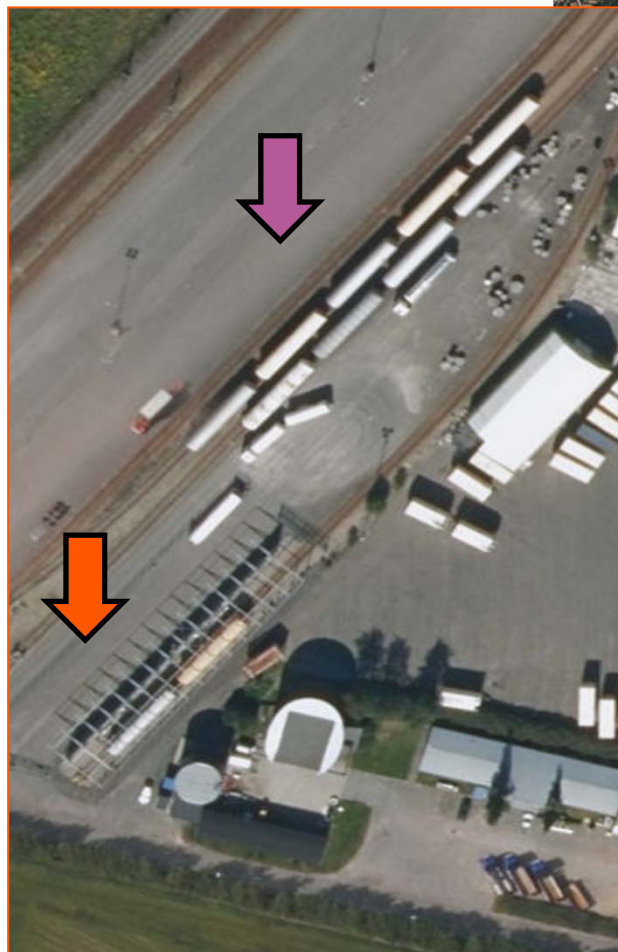
- Concern from the public regarding storage way over permitted amounts.
- Unnotified inspection March 2017
  - Storage both on permitted area, and outside on railway line (dead end)
  - Company reported to the police, permission withdrawn
- Amount was reduced under Seveso level, but company claimed this was not under Seveso.
- Have now applied for a new permission for storage.
- Will come back to what this plant did in the transition period....



## Site 2

Follow-up after the case in site 1:

- Concluded that storage on railway line outside this site is many times higher than the permitted amount.
- Located close to houses, industry, etc.
- Storage on railway line not included in risk analyses.
- Applied for dispensation in 2017.
- This was not granted, and complaint to the Ministry of Justice was also denied.
- As part of handling the complaint – we contacted Swedish and Danish authorities to ask about their understanding and practice.
  - We were told by the operator that they had different approaches...
  - Their feedback supported our conclusions.



## Back to how Site 1 tried to solve their problem

- Storage in Trondheim railway station!
- Trondheim is Norway's 3. largest town.
- Hotels, shops etc. close to railway station.
- This has set off a dialogue with Bane Nor, a state-owned company responsible for the Norwegian national railway infrastructure



## Is long term storage in railway stations and cargo terminals ok?



- Meetings with Bane Nor, regarding storage in railway stations and cargo terminals.
- Large amounts of dangerous goods is always present in some of their terminals.
- They claim that if receiver of goods have no capacity to receive, hence it is under transport..... for days and weeks on end...
- We will now arrange an inspection in the largest cargo terminal in Oslo, in order to find out how much dangerous goods is there on an average basis.



We would like to:

- hear about the situation in your countries and
- discuss your approaches if you have experienced the same situation.