**Questions for discussion at TWG 2 Annual Meetin 2021**

**From Finland**

1. annex 1 part 1: **hazard category of pentane (cyclopentane, n-pentane;**Flam Liq 2 H225)**?**

* to which category (P5a-P5c) the pentane has been classified? And why?
* What do you understand with the text *“where particular processing conditions, such as high pressure or high temperature, may create major-accident hazards”?*
* Do you have some examples of *particular processing conditions*, such as high pressure or high temperature that may create major-accident hazard?

For example if the tank of pentane is underground, could it be a criteria for the category P5c? There is a huge effect in requirements if the category is P5c or P5b!

1. **Article 3 Definitions:**

*12. ‘presence of dangerous substances’ means the actual or anticipated presence of dangerous substances in the establishment, or of dangerous substances****which it is reasonable to foresee may be generated during loss of control of the processes****, including storage activities, in any installation within the establishment, in quantities equal to or exceeding the qualifying quantities set out in Part 1 or Part 2 of Annex I;*

* How do you take into account dangerous substances *which may be generated during the loss of control of the process*?
* If the result is “waste”, it is “permanent” and we understand that we calculate the amount when determine the requirements (upper-tier or lower-tier) .
* But what about then if there happens a chemical reaction etc? For example ammonia and ammonia water?
* Do you have any examples when do you have evaluated the dangerous substances generated during loss of control of the process? How do you calculate the amount of such substances?
* However, operators have to have risk analysis and evaluate consequences, be prepared to the worst.

1. **Article 10, Safety report**

*The safety report shall be sent to the competent authority within the following time-limits: (a) for new establishments, a reasonable period of time prior to the start of construction or operation, or****prior to the modi[1]fications leading to a change in the inventory of dangerous substances***

* **Is the safety report sent always to the CA in your country if there happen any changes in the inventory of dangerous substances?**

**From France (BARPI)**

**Flaring**

1. How do different inspectorates consider flaring incidents in the context of process safety and in the feedback process?

**From Czech Republic** *(Pre-discussion prior to roundtable discussion in 2022*  *(What do we want to know?) This question was raised in the TWG 2 2019.*

**Lessons learned.**

1. How do different countries promote lessons learning?