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1. BACKGROUND

The potential for major fires in any installation that handles large quantities of hydrocarbon products is self-evident. There have been numerous large damaging fires over the years and these include tank fires which involve massive product losses and process unit fires which cause major plant damage and process interruption.

2. OBJECTIVE

The objective of this position paper is to define the standards that would be expected of a very good level of fire pre-plans in the oil, gas, and petrochemical industry. These standards are also reflected in the Marsh energy risk ranking criteria. They can be used to support and define risk improvement recommendations and also to provide detailed advice to clients seeking to improve their fire protection and emergency response systems.

3. SCOPE

The scope of this position paper includes the description and purpose, the ownership and development, and the format and content of fire pre-plans. It is applicable to any facility handling hydrocarbons and toxic materials.

4. GENERAL PRINCIPLES

Plants are normally designed, built, and operated to avoid fires by controlling the basic causes; loss of containment and ignition. They are also provided with detection and alarm systems to promote early response and intervention. Finally, there are passive and active fire protection facilities, and emergency response systems and resources, to be used as a final barrier to prevent or minimise the consequences.

A fire pre-plan is a scenario based plan, specific to a particular process area or equipment item. All fire pre-plans should be referenced in the site emergency response plan. They should describe how the fire protection and emergency response systems are to be used in specific fire case scenarios. Fire pre-plans should take into account the nature and likely effects of the fire scenario, the materials involved (process materials and plant construction materials), the surrounding environment, including plant layout, any special hazards pertaining to that area, and the resources available.

Fire pre-plans should be used to assess the resources required. They should be used for regular training and drills, and reviewed and updated after each event. Fire protection systems and emergency response resources (equipment and personnel) are generally designed to cope with the greatest demand they are likely to face. At a given site, the controlling scenario is generally referred to as the fire case. Whilst a lot of attention is paid to this as it underpins the basic design requirements of the central fire protection systems, there are other cases that need also to be studied to ensure the site is prepared for a range of eventualities.
5. SPECIFIC REQUIREMENTS

5.1 POLICY AND PROCEDURE

The Health, Safety and Environment Management System (HSE-MS) should include the procedure for the development and application of fire pre-plans. A copy of the fire pre-plans should be included in the emergency procedures manual for the site. Fire pre-plans should be managed in the same way as all other controlled documents.

Corporate standards for fire pre-plans should be available to member sites.

5.2 OWNERSHIP AND DEVELOPMENT

Fire pre-plans should be owned by the emergency response organisation at the site. There should be input from all involved and affected groups and disciplines, particularly the operations teams. Where the external/local fire brigade plays a significant part in the emergency response, they should be familiar with the fire pre-plans.

Specific evacuation plans, muster points, headcount, etc. should be covered under a separate procedure in the site emergency response plans.

By definition, a fire pre-plan is a “desk-top” derived plan, with additional input from exercise and incident feedback. The pre-plan is best developed by a team effort. Team members should include:

- Person responsible for site tactical emergency response team e.g. fire chief/fire engineer.
- Person responsible for first-line response e.g. shift supervisor.
- Operations representative - area specific.
- Firefighting team representative.
- Risk engineer.
- Safety officer.

The pre-plan should be seen as an evaluation of the type of response required for typical scenarios. In the event of an actual incident, the pre-plan should be seen as a guide and would need to be adjusted to suit local factors, e.g. weather conditions, actual process conditions. The fire pre-plan acts as an aide-memoire in crisis situations where rational thinking time could be limited. The development of a fire pre-plan may also highlight where there may be deficiencies in response capability or particular problems with the subject scenario.

Scenarios to be documented should be as comprehensive as time and resource allows. Good starting points are events typically highlighted in a safety case, or by high-level unit assessment looking at other property damage events.

5.3 FIRE PRE-PLAN PORTFOLIO

A comprehensive portfolio of fire pre-plans should include:

- A fire pre-plan for each major storage tank and each bund area (although these can often be combined for identical tanks in a single local area).
- A fire pre-plan for each pressurised storage vessel and containment area, including protection of the run-off and impounding area, and key steps to avoid a boiling liquid expanding vapor explosion (BLEVE).
- A fire pre-plan for refrigerated storage tanks including protection of the run-off and impounding area.
- A fire pre-plan for each berth at the marine terminal.
- A fire pre-plan for each rail and truck loading gantry.
- A fire pre-plan for each defined “fire area” of the unit e.g. as limited by layout/drainage where this is practical/meaningful. At least the two or three most severe fire cases for each process unit should be defined.
- Any other specific cases that are equivalent to one of the above.
5.4 FORMAT AND CONTENT

The plans are best represented on easy-reference A3 size documents, using a standard layout. Data should be included on the diagrams where possible. Lengthy narrative should be avoided and reference should be made to supporting documentation.

The Pre-plans should include the following:

<table>
<thead>
<tr>
<th>SECTION</th>
<th>DESCRIPTION</th>
</tr>
</thead>
<tbody>
<tr>
<td>Header</td>
<td>Date, revision, author, and approver.</td>
</tr>
<tr>
<td>Incident Description</td>
<td>Unit/section/equipment item/scenario.</td>
</tr>
<tr>
<td>Equipment and Contents Description</td>
<td>Size: Volume, diameter, height or length. Contents: Quantity, chemical description, and properties, e.g. flash point, auto ignition temperature. Toxic risk – including carcinogens such as Benzene and Asbestos explosion risk, e.g. Vapor Cloud Explosions (VCE), BLEVE, detonation. environmental impact and odour risk. Boil-over risk. Dispersion and cloud characteristics. Equipment and other units also at risk. Third party locations at risk.</td>
</tr>
<tr>
<td>Special Hazards</td>
<td>Location of radioactive instrumentation elements. Location of electrical equipment with polychlorinated biphenyl (PCB). Location of equipment with water reactive chemicals. High pressure gas cylinders.</td>
</tr>
<tr>
<td>Operations Response</td>
<td>Key operations response actions, e.g. shutdown, depressurisation and isolation, evacuations, remote activation of deluge/monitors etc. Where possible the number of key actions should be limited to around five to avoid excessive detail; they should also take into account the nature of the emergency e.g. it may be necessary to shut down a pump with a leaking seal from the switch house rather than the local stop/start button.</td>
</tr>
<tr>
<td>Tactical Emergency Response</td>
<td>Key tactical emergency response actions, e.g. activation of fixed protection if not automatic, deployment, and position of mobile equipment, target areas for firewater and foam (cooling/extinguishment/precautionary). Where possible the number of key actions should be limited to around five to avoid excessive detail.</td>
</tr>
<tr>
<td>Protection of Adjacent Equipment</td>
<td>Identification of other key equipment and hazard arising. Cooling requirements developed from radiation studies. Unit/section/equipment item/scenario.</td>
</tr>
<tr>
<td>Required Manpower</td>
<td>Level of initial response, e.g. shift first-line response, site brigade, local authority brigade, mutual aid partners. Minimum initial response numbers. Approach direction for various response teams, including entry point for non-site response, relative to specific and detailed wind/weather conditions.</td>
</tr>
</tbody>
</table>
SECTION DESCRIPTION

Required Equipment
Fixed equipment response, show equipment type and capacity, i.e. deluge (water, foam or chemical), foam to tank seals, monitors should also include deluge capacity, foam/chemical capacity and type.
Mobile equipment response, show equipment type and capacity, i.e. deluge (water, foam or chemical), foam to tank seals and monitors, and hydrants should also include deluge capacity, foam/chemical capacity and type.
Response required from local authority brigade and mutual aid partners as appropriate.
Limitations, e.g. quantity of site available fire fighting consumables and sources of back-up.
Limitations, e.g. volume of surrounding bunds and estimate of when full if not being drained.
Limitations, e.g. blocked routes due to equipment congestion.

Firewater Runoff
Route and destination of runoff.
Location of runoff interceptors and control points (e.g. penstocks).

Diagrams
Scenario plot plan showing position of fixed equipment including activation panels or valve stations and likely position of mobile equipment, hydrants, monitors, valve stations, water curtain provision, cooling provision, staging areas taking wind direction into account.
Radiation contour diagram for human and equipment exposure.
BLEVE profile, consequence, and radiation contour diagram.
Dispersion and toxicity diagram.

Maximum Foam and Water Requirements
For major fire cases only – i.e. those that are likely to test the capacity of the systems or define stocks to be accessible; and those that are likely to require special equipment, specific system configurations or supply arrangements to be set up early in the response plan.
Assess the maximum quantities of foam and firewater required to control and extinguish the fire. This should be based on likely duration and intensity, and the attack strategy.

5.5 DRILLS
There should be regular drills by the emergency response team in conjunction with the operations teams to maintain their familiarity with the pre-plans and also to test that the information and response steps within them is valid.

5.6 DISTRIBUTION
The fire pre-plans should be distributed as follows:

- Master copies of all fire pre-plans to be retained electronically.
- Controlled copies of all fire pre-plans to be kept in site emergency manual.
- Controlled copies of area-specific fire pre-plans to be kept in area emergency procedure manual.
- Controlled (laminated) copies of all fire pre-plans to be kept on emergency response vehicles.
6. REFERENCE TO INDUSTRY LOSSES

<table>
<thead>
<tr>
<th>EVENT DATE</th>
<th>08/06/2001</th>
</tr>
</thead>
<tbody>
<tr>
<td>Country</td>
<td>United States</td>
</tr>
<tr>
<td>Location</td>
<td>Louisiana</td>
</tr>
<tr>
<td>Unit Type</td>
<td>Storage</td>
</tr>
<tr>
<td>Event</td>
<td>Tank fire</td>
</tr>
<tr>
<td>Description</td>
<td>Gasoline layer built up on top of 270 ft diameter floating roof tank due to heavy rain. Fire started by lightning, producing full surface tank fire. Emergency services set up fire fighting equipment, and once in place, the fire was extinguished in 65 minutes.</td>
</tr>
<tr>
<td>Position paper comment</td>
<td>This incident is the largest tank fire ever extinguished. It illustrates the benefits of fire pre-plans.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>EVENT DATE</th>
<th>17/03/2008</th>
</tr>
</thead>
<tbody>
<tr>
<td>Country</td>
<td>Germany</td>
</tr>
<tr>
<td>Location</td>
<td>Koln</td>
</tr>
<tr>
<td>Unit Type</td>
<td>Storage</td>
</tr>
<tr>
<td>Event</td>
<td>Tank fire</td>
</tr>
<tr>
<td>Description</td>
<td>An ethylene release from a major pipeline ignited to form a jet fire, which impinged on an adjacent Acrylonitrile storage tank. A major tank fire ensued which took 9 hours to extinguish, during which a number of fire tenders were in attendance with the deployment of 1,180 fire fighters. The flames had a devastating impact on the tank’s concrete wall, causing cracks and causing the stability of the whole tank to be in question. Note that the original jet fire took 5 hours to extinguish. There was no active fire protection available in the area, and no specific emergency plans for this scenario. The total cost (property damage, plus business interruption) was around Euro 53 million.</td>
</tr>
<tr>
<td>Position paper comment</td>
<td>With clear scenario plans in place, the effects of this major fire could have been greatly reduced.</td>
</tr>
</tbody>
</table>

7. REFERENCE TO INDUSTRY STANDARDS

API RP 2001 Fire Protection in Refineries.
8. APPENDICES

APPENDIX A

Example of a fire protection pre-plan
THE ENGINEERING SERVICES TEAM

Marsh’s Risk Engineering Services team has been established for over 25 years and is uniquely qualified to provide risk managers and underwriters with the essential information they need to determine the right limit and scope of cover and the right price.

Each member of the team is a qualified engineer, with practical experience in design, construction, operation, and maintenance across a broad range of oil, gas, and petrochemical risks.

They have all been trained in advanced insurance skills, in the ability to assess and analyse risk, and to communicate effectively and frequently in more than one language.

The goal is to build bridges between risk engineering, insurance and risk management, and between the client and the underwriter. At the same time, the comparative skills of the team permit a benchmarking system which gives a global opinion of the risk, assessed against peer plants world-wide.

From the earliest planning stage to the last operational phase, the engineering services team is able to contribute practical and cost-effective advice, and assistance.

In addition to tailored programmes, the team has a series of core packages, covering everything from managing a major emergency to risk reduction design features, and safe working practices.

The Engineering Services team uses its breadth of expertise, experience, and its practical knowledge and skills to communicate a real understanding of physical risks, your insurance implications and the commercial operating environment.
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