



Shell Energy India Private Limited
(Formerly known as Hazira LNG Private Limited)

BG House, Lake Boulevard
Hiranandani Business Park, Powai
Mumbai – 400 076

India

Website: www.shell.in

Tel: +91 22 40325321

Fax: +91 2240058931

SEI/MC/2020/PNGRB/PCD/02

10 May 2020

The Secretary,
Petroleum & Natural Gas Regulatory Board,
1st Floor, World Trade Centre,
Babar Road,
New Delhi – 110001

Sub: Comments on the proposed Amendments in the PNGRB ((Codes of Practices for Emergency Response and Disaster Management Plan (ERDMP)) Regulations, 2010

Respected Madam,

This has reference to the public notice soliciting views on the Proposed Amendments in the PNGRB Codes of Practices for Emergency Response and Disaster Management Plan (ERDMP) Regulations, 2010.

We welcome the initiative of the PNGRB for proposing various necessary amendments to the ERDMP Regulation 2010 to enable the development of robust Emergency Response and Disaster Management Plans. ERDMP is critical for systemic response to any unexpended and dangerous occurrence. Shell accords the highest priority to safety standards and adopts suitable HSSE and ERDMP plans to avoid any harm to people, environment and property. We have reviewed the proposed amendments and submit the following recommendations for the consideration of the honorable Board.

ERDMP for Road Transportation: Proposed inclusions to address transport of LNG by road

1. It is recommended to include suitable emergency risk management plans for various worst-case scenarios such as product release, BLEVE, loss of control, third-party vehicle rear-ending the loaded LNG tanker / semi-trailer, rollover followed by product release, natural calamity etc.
 - a. Various scenarios involving cryogenic tanker such as immobile transport unit with vacuum-intact and immobile transport unit with vacuum-broken and a combination of these scenarios should be considered. Such scenarios might warrant special action like flaring, product transfer, venting to a safe location etc. Hence, a compressive guide is recommended to be provided in the regulation for formulating a robust ERDMP for transportation of LNG.
2. Medical emergency response plan to be included in the road transport ERDMP with mitigation measures and preventive action plan.

CIN: U40100GJ2000PTC038780

Registered Office: 101-103, Abhijeet-II, Mithakhali Circle, Ahmedabad, Gujarat 380 006, India Tel: +91 79 30011100



:2:

3. All the road transport emergencies will be classified as off-site emergencies (level 3) as per the existing classification of emergencies (Article 6), requiring the intervention of the District Administration for management and control of the emergency. We request the board to propose a suitable sub-categorization of the emergency/incidents depending on the risk analysis and severity for management by either the Transporter or the District Administration, as required.

Mobilization for Road Transportation Emergencies: Proposed inclusions to address transport of LNG by road

1. As a part of ER preparedness, suitable PPE is required to be used for Cryogenic application such as cryogenic hand gloves, face shield, hard hat, safety goggles, safety shoes and FRC overall. Additionally, equipment including special tool kit, cryogenic hose, flanges, flares, nitrogen cylinder etc. is required for handling cryogenic emergency. Hence, we recommend updating the "Other safety items" as mentioned in Schedule VIII with the requisite emergency equipment suitable for LNG.

We request the honorable Board to consider the above inputs while finalizing the amendments to the ERDMP Regulations. We will be happy to provide any further information if required.

Your Sincerely,
For **Shell Energy India Private Limited**

Ashwani Dudeja
Director