

Department for Environment, Food and Rural Affairs

General Guidance for Switchgear Containing SF₆

Guidance: F Gas and Ozone Regulations

Information Sheet SCS 4: Getting Started

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Information Sheets SCS 1 to SCS 3 provide information for operators of switchgear containing SF₆ in relation to the EU F gas Regulations. In this Information Sheet we provide advice on the steps that you should consider to ensure that your organisation meets its obligations and minimises emissions of SF₆, which is a very powerful F gas.

Step 1: Identify General Scope of Obligations

The first step is to identify those aspects of the EU F gas Regulations that apply to your organisation. The obligations for users of switchgear containing SF₆ are summarised in Information Sheet SCS 3.

Two key questions should be addressed:

- 1) **Do you know your SF₆ usage?** Most major electricity generators and network operators make extensive use of SF₆. Make sure you know the full extent of usage, including stored SF₆, and are aware of the obligations.
- 2) **Do you have any non-switchgear obligations related to F gases and ozone-depleting substances?** For example, do you use HFCs or HCFCs for refrigeration, air-conditioning or for fire protection systems?

As you establish the answers to these questions you should make an estimate of the number of sites and systems that are affected – including depots and offices. This will help you assess the overall impact of the Regulations and influence the way in which you will plan for compliance.

Step 2: Determine Who is Responsible for Compliance

Determine who is responsible for compliance. Typically, the main responsibilities are held by the “Operator”. Refer to Information Sheet SCS 3 for details.

Step 3: Allocate Director Level and Operational Responsibilities

The next important step is to allocate responsibilities. It is suggested that a Director or senior engineer has overall control, so you can be certain that obligations are being met. It may be necessary to identify operational responsibilities in several parts of the organisation to ensure full coverage.

Step 4: Establish Inventory of Relevant Equipment

Consider establishing an inventory of the SF₆ containing switchgear in the organisation. It is sensible to give each piece of equipment a unique identification and record the location and other relevant details (e.g. cross reference with your asset register). For switchgear you should identify:

- Location and type of switchgear,
- Quantity of SF₆ in each switchgear system.

Step 5: Set up a Record Keeping System

For all switchgear containing SF₆ although not an obligation it is recommended that you keep records (see Information Sheet SCS 3 and SCS 6 for details). The inventory is a good starting point for record keeping. Records should be regularly updated by competent personnel working on the equipment.

A key issue will be to decide how the records are kept up to date and how they can be consolidated from site level up to company level. The only way that you can be reasonably sure of compliance is to check records.

Step 6: Ensure that All Personnel are Qualified

Make sure that all relevant personnel you employ, both in-house staff and subcontractors, to deal with switchgear containing SF₆ understand the requirements and the purpose of these Regulations. Put procedures in place to ensure that personnel undertaking recovery activities on switchgear containing SF₆ have the appropriate qualifications. If you need to take delivery of containers of SF₆ then you may need to employ appropriately qualified personnel to use that SF₆. Your fluid supplier may ask for a certificate as evidence that the company employs qualified personnel if SF₆ recovery is undertaken. See Information Sheet SCS 5 for more details.

Step 7: Use Records to Identify and Improve “Rogue” Plants

There is good evidence that a significant proportion of leaks occur from a small number of “leaky” systems. The 80:20 rule often applies quite well, i.e. that 80% of leaks come from only 20% of the systems.

Identifying the “rogue” plants gives a good opportunity for a company to significantly reduce overall leakage. It is worth investing effort to improve these units.

The information in this document is intended as guidance and must not be taken as formal legal advice or as a definitive statement of the law. Ultimately only the courts can decide on legal questions and matters of legal interpretation. If you have continuing concerns you should seek legal advice from your own lawyers.

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