

HOCF-BSG-GPSS Sale Ministry of Defence Main Building Whitehall London SW1A 2HB United Kingdom



Reference: FOI2915/08726

Date: 25 November 2015

Dear ,

REQUEST FOR INFORMATION UNDER THE ENVIRONMENTAL INFORMATION REGULATIONS 2004 (EIR)

I am writing in response to your email dated 6 October 2015 in which you raise a number of questions regarding the sale of the Government Pipeline and Storage System (GPSS) to Compañía Logística de Hidrocarburos (CLH) and the relationship with the nearby AWE site. This letter is to inform you that the MOD has considered your request under the Environmental Information Regulations 2004.

We have provided answers to your questions where possible and applied **Regulation 12(4)(a)** where a public authority may refuse to disclose information to the extent that it does not hold that information when an applicant's request is received.

We have also enclosed a map of the Aldermaston pipeline routes at Annex A, please see below responses to each of your questions.

Infrastructure Questions

Q. What is the diameter of the oil supply pipe?

- A. The GPSS network sale included four pipelines that run within the vicinity of the AWE.
 - 1. A/S (S) Aldermaston to Tetsworth
 - 2. A/T (E) Aldermaston to Walton
 - 3. R/S Satchell Lane to Aldermaston
 - 4. A/A (E) Aldermaston to Putthall Fm

Q. Where are the local pumping stations?

A. There is a pumping capability on the Aldermaston PSD site. The nearest cross country pumping station is at Easthampsted, Berkshire.

Q. Where are the local gas purge or vents?

A. Under regulation 12(4)(a) we cannot disclose information to the extent that the Department does not hold information pertaining to local gas purge or vents. The GPSS when sold was a hydrocarbon fuel

distribution system and did not convey any gaseous substances. Any vents pertaining to the Aldermaston PSD are situated on the Aldermaston PSD sites.

Under Regulation 9(1) a public authority shall provide advice and assistance, so far as it would be reasonable. You may wish to consult the Line search before u dig website to make an enquiry regarding gas pipelines within the Aldermaston area. A link to the linesearch before u dig site can be found here: http://www.linesearchbeforeudig.co.uk/#

Q. Are there are any holding tanks off the AWE site? And

A. Under regulation 9(2)(a) and 9(2)(b) of the EIR Regulations 2004 (Advice and Assistance) we asked for further clarification of this question to which you subsequently replied on 30 October 2015. 'By holding tanks, I mean storage vessels similar to those at the PSD site, whether underground, above ground or partially both and; By off the AWE site, I mean are there storage vessels separate from those at the PSD but relating to the AWE site?

The Department can confirm that the GPSS network sale did not include any storage vessels separate from those at the Aldermaston PSD site which relate to the AWE site and there were no storage vessels sold to CLH on the AWE site.

Q. Are there are any gas grid distribution pipelines nearby?

A. Under regulation 12(4)(a) we cannot disclose information to the extent that the Department does not hold information pertaining to gas grid distribution pipelines.

Under Regulation 9(1) advice and assistance, you may wish to consult the Line search before u dig website to make an enquiry regarding gas pipelines within the Aldermaston area. A link to the linesearch before u dig site can be found here:

http://www.linesearchbeforeudig.co.uk/#

Management Questions

Q.1 Did MOD examine the management systems of CLH and approve the transfer of ownership from COSTAIN to CLH in March 2015?

A. Costain did not own the GPSS network. They were contracted by the Oil and Pipelines Agency (OPA) to oversee the operation and maintenance of the Government Pipeline and Storage System (GPSS). The sale of the GPSS was agreed in March 2015 to CLH and all contracts held by the OPA pertaining to the GPSS were transferred in whole or in part to CLH on completion of the sale on 30 April 2015. Costain continues to be the Aldermaston PSD site operator on behalf of CLH Pipeline System which holds ultimate responsibility for environmental and process safety management and Competent Authority regulatory compliance for the pipeline.

Q.2 Does COSTAIN retain any responsibility for the site and the pipeline under, over or into AWE Aldermaston since the sale of its interest to CLH?

A. As previously stated, Costain continues to be the site operator for the Aldermaston PSD. There are no GPSS pipelines under, over or into the AWE site. We have included a Location Plan Extract of the pipelines included in the sale at Aldermaston at Annex A.

Q.3 Are the outstanding concerns listed on the COSTAIN website section "NEXT STEPS: HRO • Energy reduction • Staff Competency levels • Ageing assets • Safe Systems of Work," transferred to CLH?

A. Under regulation 9(2)(a) and 9(2)(b) of the EIR Regulations 2004 (Advice and Assistance) we asked for further clarification of this question as we could not find the information you are referring to, you subsequently replied, 'Does MOD ensure safety standards of CLH relating to Staff Competency levels • Ageing assets • Safe Systems of Work at the PSD site and the oil pipeline at or near AWE Aldermaston'.

Under regulation 12(4)(a) we cannot disclose information to the extent that the Department does not hold the information you have requested. CLH Pipeline System holds the ultimate responsibility for managing Aldermaston PSD and ensuring it complies with Competent Authority regulations and UK safety standards.

Q.4 Can you supply documentary evidence of MOD supervision of these NEXT STEPS programmes or provide the latest MOD Reports relating to each heading?

A. Please see answer to question 3 above.

Q.5 Are there functioning pipelines from the PSD sites passing under or over AWE Aldermaston? If so, how many, and where do they go to?

- A. There are no pipelines that pass under or over the AWE site.
- Q.6 If so, when was the pipeline constructed?
- Q.7 If so, when was the pipeline last serviced?
- Q.8 Has it ever been rebuilt?
- Q.9 Will it need rebuilding in future?
- Q.10 What was the predicted life of the pipe when first/last constructed?

As previously stated, there are no GPSS pipelines that pass under or over the AWE site. The pipeline is required to comply with a Health and Safety Executive approved integrity and maintenance regime to ensure it meets UK industry standards and is regulated by the Competent Authority.

Q.11 How many disused and used fuel bunkers are on the whole site? And what is their capacity?

A. The GPSS network sale did not include either disused or used fuel bunkers on the AWE site.

Q.12 When Safety Exercises take place on AWE Aldermaston, what account is taken of this pipeline?

A. Under regulation 12(4)(a) we cannot disclose information to the extent that the GPSS team does not hold the information you have requested. There were no pipelines under or over the AWE site included in the GPSS network sale.

Q.13 When Safety Exercises take place at the PSD sites, what account is taken of their proximity to AWE Aldermaston?

A. Under regulation 12(4)(a) we cannot disclose information to the extent that the Department does not hold information pertaining to CLH-PS current safety exercises at Aldermaston PSD and how it takes account of its proximity to the AWE site. CLH-PS holds the ultimate responsibility for ensuring it's environmental and process safety management systems are effective, the site is a top tier COMAH site and is rigorously regulated to comply with UK standards.

Q.14 Did the Royal Berks Fire and Rescue 2008 safety exercise report in which it was suggested boom points should be established where a spill might reach, included the streams towards AWE between Rectory Road and Red Lane?

A. Under regulation 12(4)(a) we cannot disclose information to the extent that the Department does not hold information pertaining to the report written by the Royal Berks Fire and Rescue Department in 2008.

Rights of Appeal

If you are not satisfied with this response or you wish to complain about any aspect of the handling of your request, then you should contact me in the first instance. If informal resolution is not possible and you are still dissatisfied then you may apply for an independent internal review by contacting the Information Rights Compliance team, 1st Floor, MOD Main Building, Whitehall, SW1A 2HB (e-mail CIO-FOI-IR@mod.uk). Please note that any request for an internal review must be made within 40 working days of the date on which the attempt to reach informal resolution has come to an end.

If you remain dissatisfied following an internal review, you may take your complaint to the Information Commissioner under the provisions of Section 50 of the Freedom of Information Act. Please note that

the Information Commissioner will not investigate your case until the MOD internal review process has been completed. Further details of the role and powers of the Information Commissioner can be found on the Commissioner's website, http://www.ico.org.uk.

Yours sincerely,

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