

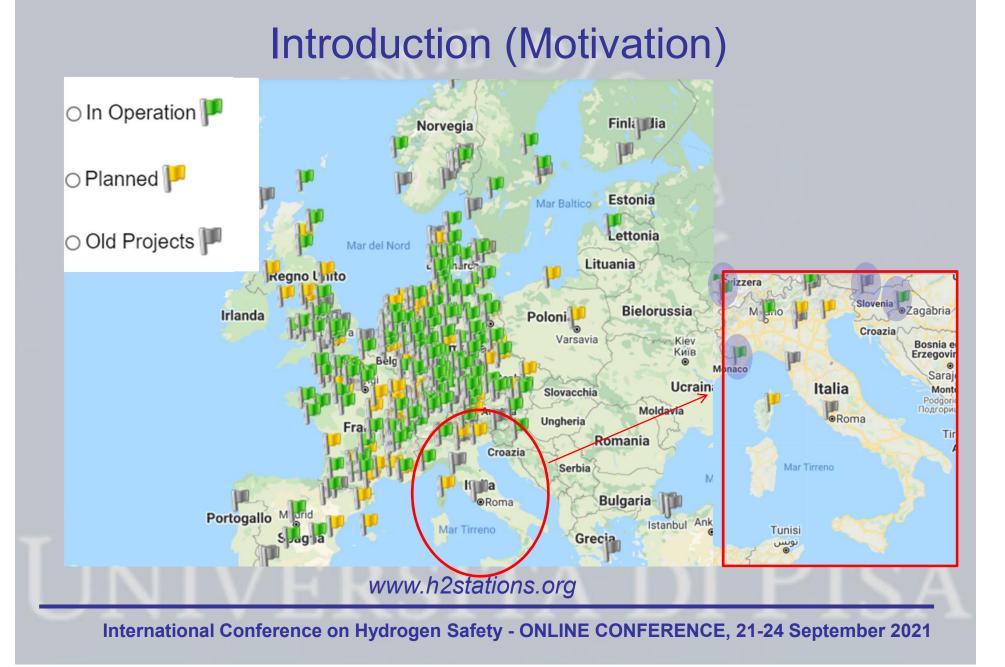
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PRESENTATION OUTLINE:

- Introduction (motivation)
- Italian regulation on hydrogen filling stations
 - Safety distances according to D.M. 23/10/18
 - Strengths and weaknesses of the Italian approach
 - Definition of safety distances and potential source of hazards
 - Introduction of the Fire safety engineering approach in the Italian regulation
- Example of application of the proposed approach
 - Calculation of "External safety distance" for the source of hazard "Dispenser"
- Conclusions





Italian regulation on hydrogen filling stations

Quantity of H2 in the plant

Above the threshold of application of the "Seveso Directive" 2012/18/UE

5.000 kg < x < 50.000 kg

Compliancy to **land use regulation Notify** the authority (*180 gg before starting construction*)

x > 50.000 kg

Compliancy to land use regulation Notify the authority Preliminary Safety report (to get authorization to start building of the plant) Safety report (including detailed Safety analysis) (to get authorization to start operating of the plant) **Below the threshold** of application of the "Seveso Directive" 2012/18/UE

x < 5.000 kg

Approval by Fire Brigade Command of the province in which the station is located

Compliancy with D.M. 23 October 2018 "*Fire prevention technical rule for the* <u>design, construction and operation of</u> <u>hydrogen filling station</u>"

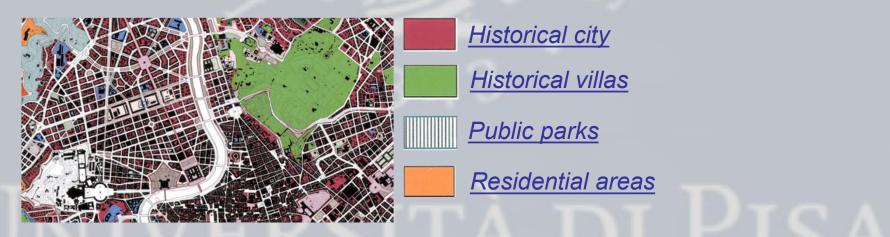
- Exclusion zones
- Minimum design requirement
- Compliance with "safety distances"

Italian regulation on hydrogen filling stations

D.M. 23/10/18 "*Fire prevention technical rule for the design, construction and operation of hydrogen filling station*"

Hydrogen fuelling station cannot be built:

- urban settlement of a historical, artistic nature and of particular environmental value or portions of them, including the surrounding areas, which can be considered an integral part of the settlement.
- In areas where the building index is higher (or planned to be higher) than 3m³/m²
- Areas identified as "public green areas"



Safety distances according to D.M. 23/10/18

Potential Source of Hazard	Protection Distance [m]	Internal safety Distance [m]	External safety Distance [m]
Compressor	15		30 (*)
Storage	15	15	30
Tube trailer	15	15	30 (*)
Dispenser	15 (**)	12	30 (**)

(*) Can be reduced by 50% if between the compressor room openings and the target non combustible shield are installed (not applicable in case of building or areas used by the community)

(**) Can be reduced by 50% if in between the dispensing unit and the target non combustible shield are installed (not applicable in case of building or areas used by the community)

The Decree allows to apply the "Fire safety engineering" as described by D.M. 9 May 2007 to calculate lengths of safety distances other than the one imposed

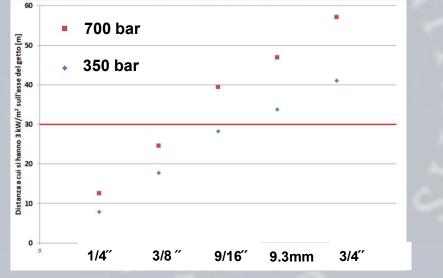
The Decree mentions the ISO 19880 "Gaseous hydrogen -- Fuelling stations General requirements" **standard** as a reference in case of requests of derogation from the provisions listed in the decree.

Strengths and weaknesses of the Italian

approach

Strengths

- Homogeneous application on the National territory
- Simple rules imply low investment costs for safety studies (no safety analysis required)



Weaknesses

- External safety distance not compatible with most of urban installation sites
- Land "free of targets" required to comply with external distance is very high
- No differences on the length of safety distances depending on the maximum pressure in the plant (350 bar or 700 bar)
- No differences on the safety distances depending on the size of the plant (pipe dimensions etc.)
- Between the "mitigations" wall protections are considered but <u>no mention is made of safety systems or</u> <u>measures aimed to limit the release in case of a leak</u> (i.e. decreasing the frequency of occurrence of a worst case scenario)

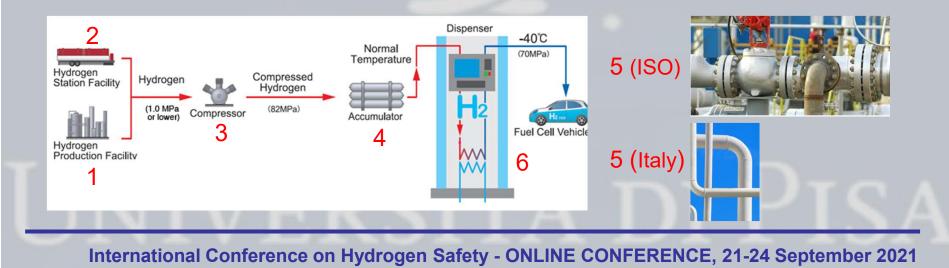
Definition of safety distances

ISO 19880 Gaseous hydrogen Fuelling stations General requirements.	Italian fire protection regulation (D.M. 30/11/83)	
Restriction distances Minimum distance from hydrogen equipment or the area around where certain activities are restricted or subject to special precaution (e.g. no open ignition sources)	The «restriction distance» has ho equivalent in the italian regulation (the definition is similar to an ATEX zone)	
Clearence distances Minimum distance between the fuelling station equipment and the vulnerable target within the fuelling station site boundary	Distanza di sicurezza interna (Internal safety distance) Minimum distance, established by the ergulation, measured	
Installation layout distances Minimum distance between the various equipment of the hydrogen installation required to prevent escalation to other equipment to other equipment in case of an accident	horizontally between the respective perimeters of the various sources of hazard of the plant	
Protection distances Is to prevent damage to the hydrogen fuelling station equipment from external hazards not accounted for the installation layout distance	Distanza di protezione (Protection distance) Minimum distance measured horizontally between the sources of hazard of the plant and the fence (when required) or the boundary of the area	
External risk zone Distance (or area) outside the fuelling station which is to be protected from hazards caused by the fuelling station (people and construction offsite are regarded to be target)	Distanza di sicurezza esterna (External safety distance) Minimum distance measured horizontally between the perimeter of each source of hazard of the plant and the perimeter of the nearest building or other public or private activity (including future building area)	

Potential sources of hazard

ISO 19880 Gaseous hydrogen Fuelling stations General requirements.	Italian fire protection regulation (D.M. 23/10/18)
1) On-site hydrogen production unit as applicable	1) Hydrogen production unit, in present
2) Hydrogen delivery system, including mobile storage and remote fill points as applicable	2) Tube trailer
3) Compressors	3) Compressors
4) Storage	4) Storage
5) Piping connection (not welded)	5) Piping
6) Dispensers	6) Dispensers

7) Hydrocarbon delivery system, if present



"Fire safety engineering approach" According to D.M. 9 Maggio 2007

First Phase

- Identification of the representative conditions of the risk posed by the plant
 - Definition of the Safety objectives
 - Definition of the "performance levels" (to meet the objectives)
 - Definition of the accidental scenario

Second Phase

- Description of the design criteria to compensate the risks
- Quantitative analysis of the selected scenarios

The Ministerial Decree do not provide frequency threshold or other risk acceptance criteria to select accidental scenarios, nevertheless suggests to take into account events that can "**reasonably**" occur.

Example of application of the proposed approach

Calculation of "external safety distance" for the source of hazard "Dispenser"

First Phase

Dispenser



Safety objectives

Safeguarding human lives

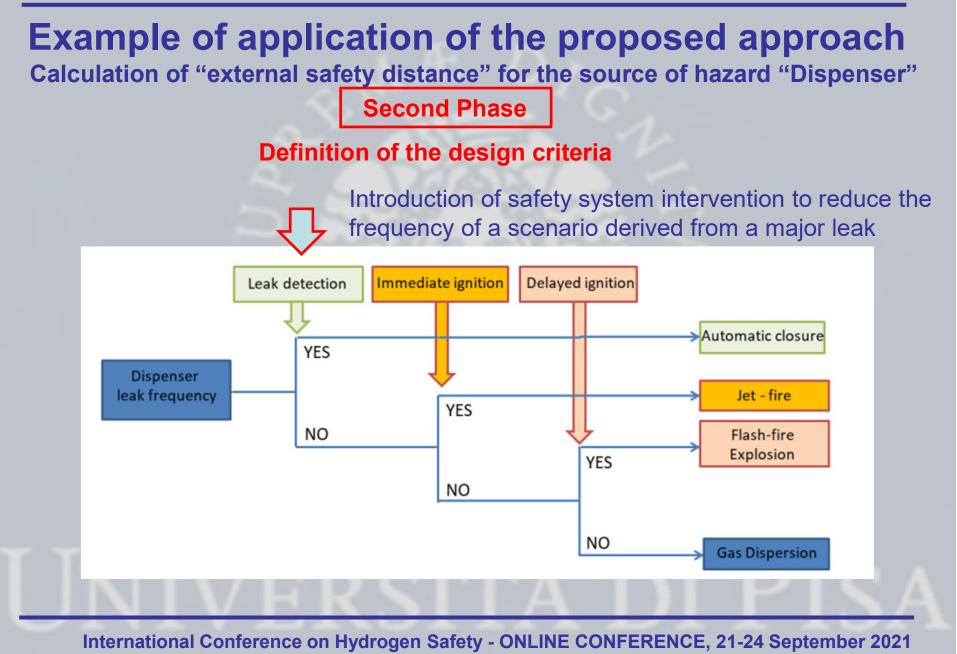
Performance levels Ref. D.M. 9 Maggio 2001

Accidental scenario	Lethality	Start of lethality	Irreversible injuries	Reversible injuries	Damage to structures
Jet-fire (Heat-flux) [kW/m²]	12.5	7	5	3	12.5
Flash-fire	LFL	1⁄2 LFL			
VCE (overpressure) [bar]	0.3	0.14	0.07	0.03	0.3 (0,6)

Accidental scenario

Jet-fire

<u>Hypothesis</u>: no significant overpressure from delayed ignition in open environment without significant obstacles that can accelerate the flame front



Example of application of the proposed approach

Calculation of "external safety distance" for the source of hazard "Dispenser"

Failure frequencies

Second Phase

Quantitative analysis

HYRAM Software toolkit (cited by ISO 19880)

Developed by SANDIA National laboratories

Provides a basis for conducting quantitative risk assessment and consequence modelling for hydrogen infrastructure and transportation systems.

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Component / Item	Leak size 0.01% -0.1% - 1%	Leak size 10%	Leak size 100%
Hoses		1,53E-04	7,32E-05
Flanges		3,73E-05	1,55E-05
Joints		6,64E-06	5,94E-06
Instruments		1,81E-04	1,12E-04

adopted

Completed distribution data are provided by Hyram, Mean vaule

Ignition frequencies

Release flow rate [kg/s]	Immediate ignition	Delayed ignition
<0.125	0.008	0.004
0.126 – 6.25	0.053	0.027
> 6.25	0.230	0.120

Consequence model (Jet-fire) / dispersion / overpressure in confined environment)

Example of application of the proposed approach

Calculation of "external safety distance" for the source of hazard "Dispenser"

Dispenser



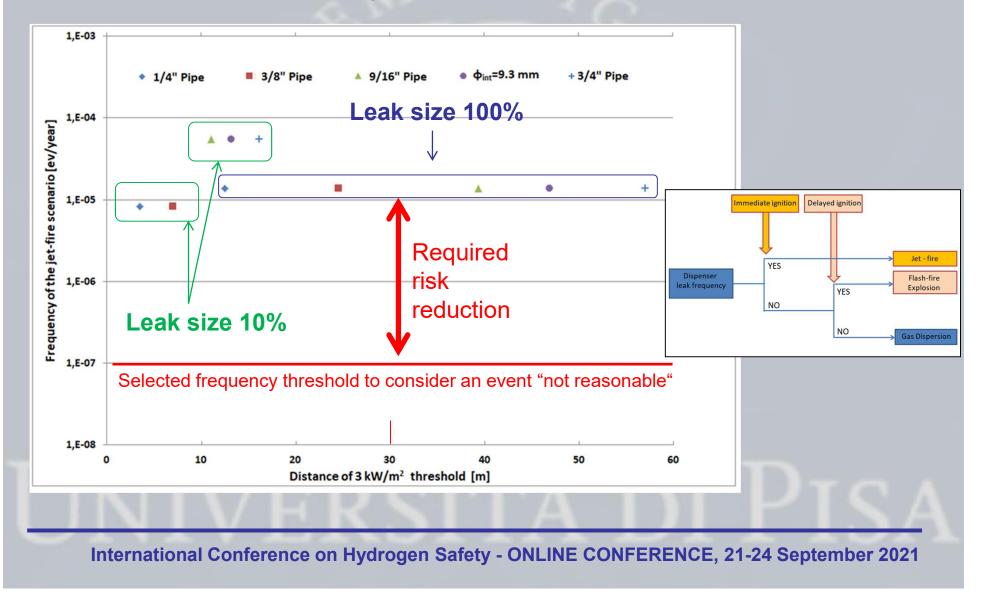
Components	Nr. of Items	
Hose	1	
Valves (including nozzle and break away)	11	
Instruments	4	
Length of pipes [m]	10	
Flanged connections 4		
Non-flanged connections 12		
Heat Exchanger 1 ^(*)		
(*) Components and connections of the Heat exchanger had been considered in the previous lists		

Component / Item	Leak size 10%	Leak size 100%
Dispenser	1.03 E-03	2.56 E-04

Cumulative leak frequency for the potential source of hazard "Dispenser"

Example of application of the proposed approach

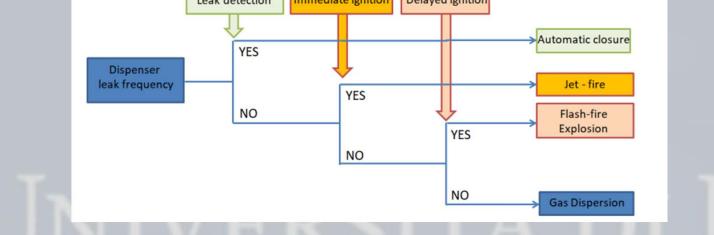
Calculation of "external safety distance" for the source of hazard "Dispenser"



Example of application of the proposed approach

Calculation of "external safety distance" for the source of hazard "Dispenser"

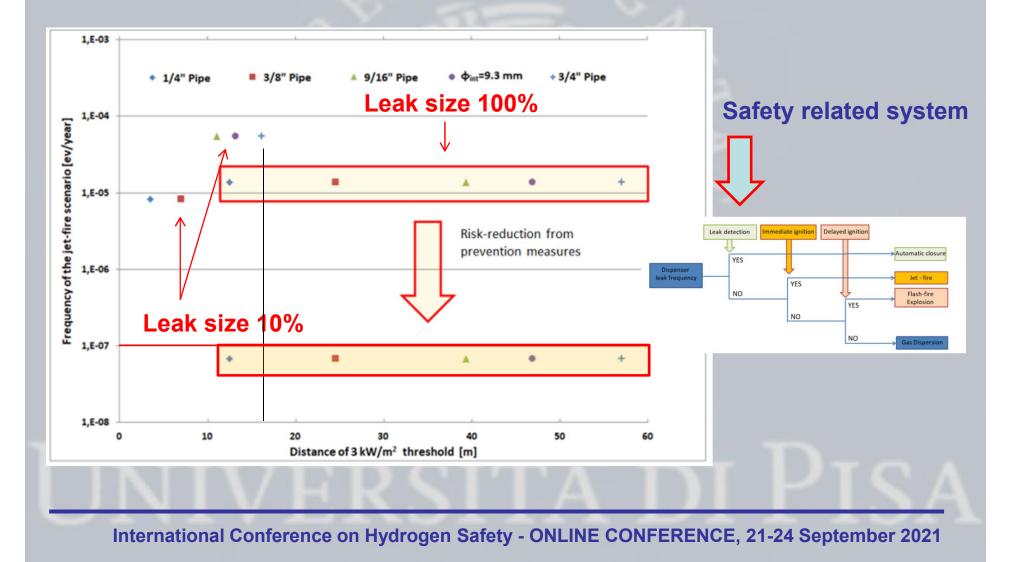
			SIL LEVELS ACCORDING IEC 61508 / IEC 61511			
Introduction of safety system	SIL Safety Integrity Level	PFDavg Average probability of failure on demand per year (low demand mode)	RRF Risk Reduction Factor	PFDavg Average probability of failure on demand per hour (high demand or continuous mode)		
L 2 based on required risk reduction	SIL 4	$\geq 10^{-5}$ and $< 10^{-4}$	100000 to 10000	≥ 10 ⁻⁹ and < 10 ⁻⁸		
The second secon	SIL 3	$\geq 10^{-4}$ and $< 10^{-3}$	10000 to 1000	$\geq 10^4$ and $< 10^{-7}$		
	SIL 2	$\geq 10^{-3}$ and $< 10^{-2}$	1000 to 100	≥ 10 ^{.7} and < 10 ^{.6}		
	SIL 1	$\geq 10^{-2} \text{ and } < 10^{-1}$	100 to 10	$\geq 10^{-6}$ and $< 10^{-5}$		



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Example of application of the proposed approach

Calculation of "external safety distance" for the source of hazard "Dispenser"



Summary of application of the proposed approach



Assess the reference **scenario or scenarios** related to the potential source of hazard under investigation

Calculate the **cumulative leak frequency** for the components of **potential source of hazard** using HyRAM data for 100% and 10% Leak size

Assess the Safety Integrated Function required to shut-off the release

Assess the **risk reduction and related SIL** level needed to consider "**not credible**" a scenario derived from 100% leak size rupture

Calculate the distances derived from a 10% leak size scenario

Conclusion

- The proposed approach, based on the application of the "Fire safety engineering" as defined by the Italian regulation, can maintain a simple and uniform approach as well as reduce the costs compared to a full safety analysis of the plant
- The proposed approach refers to decrees or standards already included or cited by the Italian regulation.
- The proposed approach allows to calculate external safety distances other than those imposed by the Italian regulation by **taking into account the presence of "safety related systems"**
- Reducing the frequency of occurrence of a rupture scenario by introducing a safety related system allows to shorten the safety distances at the same time enhancing the overall safety of the installation.



Future development

- Future steps of the present work will consist in a more extensive application of the proposed approach to the hazardous sources of the fuelling station defining for each "safety distance"
 - Safety objectives
 - Performance levels
 - Accidental scenarios
- A critical step has been identified in defining a criteria for the selection of the threshold frequency of occurrence of an accidental scenario that can allow to consider it "not reasonable"

Thank you for your attention

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