Guidance on Risk Assessments for compliance with Dangerous Substances and Explosive Atmospheres Regulations (DSEAR)

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Introduction

With the increasing use of refrigerants with various levels of flammability, it is important for the industry to understand how to comply with DSEAR. When originally written in 2002, DSEAR only applied to those refrigerants defined as flammable (hazard classes H220 and H221). This referred to refrigerant classes A2 and A3, but with the introduction of class A2L refrigerants they also come under the scope of this regulation.

However, the regulation was amended in 2015 to include gases under pressure (hazard class H280), which means all classes of refrigerant are within the scope of DSEAR, and hence ALL refrigeration, air conditioning and heat pump (RACHP) installations need to be compliant.

As a result, and in addition to normal Management of Health and Safety at Work assessments, a risk assessment must be undertaken to cover all aspects of work pertaining to the refrigerant in use.

This document is intended to be a general guide as to how to approach preparing a risk assessment which will ensure compliance with DSEAR.

Following publication of this introductory guide, more application specific guidance will be issued in due course.

This guide has been issued by FETA, and is the result of joint discussions with the Institute of Refrigeration and the Health and Safety Executive.
Definitions

Dangerous Substance
A substance or preparation which meets the criteria in the approved classification and labelling guide for classification as a substance which is explosive, oxidising, flammable, highly flammable, or extremely flammable, whether or not that substance or preparation is classified under the CHIP regulations.

Explosive Atmosphere
A mixture under atmospheric conditions of air and a gas, that once ignited spreads to the entire unburned mixture. The following is also worth noting:
   (a) Atmospheric conditions are -20°C to 40°C and 0.8 to 1.1 bar
   (b) Combustion - the definition within the regulation states that where it can be ensured that the gas is present in a concentration below the lower explosive limit, the atmosphere is not explosive. (Within the HSE approved code of practice the Lower Flammable Limit (LFL) and Lower Explosion Limit (LEL) are intended to have the same meaning).

Hazard
The property of a dangerous substance which has the potential to give rise to fire or explosion.

Risk
The likelihood of a person’s safety being affected by harmful physical effects being caused from fire, explosion or other events arising out of the use of the hazardous substance.

Risk Assessment
There are two methods of Risk Assessment commonly used, these are:
   • Qualitative Assessments, a simple study using personal judgement and perception on elements of risk.
   • Quantitative Assessments, to give an objective probability estimate, an in depth study using known information on elements to calculate the effects of risk exposure on people, environment and economy.

Employer
A person, partnership, corporate body, unincorporated body or organisation that employs one or more persons under a contract of employment. The term employer is used throughout the HSE DSEAR Approved Code of Practice. For the purposes of the regulations and this guidance document, employers include contractors, sub-contractors and self-employed persons.

Competency
The definition of competency is more complex to equate. A common description of a competent person would include the following traits:
   • Trained
   • Experienced
   • Skilled
   • Appointed
A competent person undertaking a risk assessment would also need to be given adequate time and resources to enable the assessment to be carried out to the required standard.
**Workplace**
Any premises or part thereof used for or in conjunction with work, and includes; any place within the premises to which an employee has access while at work and any areas used as a means of access or egress from that place of work.
(a) Workplace also includes areas in private dwellings where work is carried out.
(b) Premises can also be used to include vehicles, vessels, land based or off-shore, private roads or paths on industrial estates and business parks.

**Control**
Is used to describe steps taken to reduce the likelihood of a fire, explosion or uncontrolled release. Control measures should be considered before mitigation.

**Mitigation**
Is the description of the steps taken to minimise the consequences of the aforementioned events.

**Reducing Risk**
As low as reasonably practicable (ALARP). Detailed guidance on the principles of ALARP can be found on the HSE website, see below.

**References**
This guidance should be read in conjunction with the regulation itself, and the HSE’s own Approved Code of Practice (ACOP).


The ACOP can be downloaded at: [http://www.hse.gov.uk/pubns/books/l138.htm](http://www.hse.gov.uk/pubns/books/l138.htm)

The HSE website has further information at: [http://www.hse.gov.uk/fireandexplosion/dsear.htm](http://www.hse.gov.uk/fireandexplosion/dsear.htm)

ALARP can be found at: [http://www.hse.gov.uk/risk/theory/alarp.htm](http://www.hse.gov.uk/risk/theory/alarp.htm)
Risk Assessment

Regulation 5 of DSEAR requires all employers and self-employed people to undertake a risk assessment to identify all potential risks to employees and others whose safety may be affected by the use or presence of a dangerous substance in the workplace.

The Management of Health and Safety at Work Regulations requires that employers with 5 or more employees must record the significant findings of their assessment. If less than 5 persons are employed, it is best practice that the assessment is recorded. It may be used as evidence that the evaluation of risk has been completed to a satisfactory standard.

All Refrigeration, Air Conditioning, Heat Pump and Building Services Contractors should be familiar with this concept, as a large proportion of their work activities require the generation of a suitable and sufficient risk assessment.

It could be the case that a separate DSEAR assessment may not be necessary as the assessment of the relevant risk may be highlighted within the risk assessment required by the Management of Health and Safety Work Regulations.

DSEAR states that the following shall be considered with regard to risk assessment as a minimum:

- The hazardous properties of the substance;
- Persons likely to be affected and the severity of the consequences;
- Information on safety provided by the supplier, including information contained in any relevant safety data sheet;
- The work involved including:
  - The work process
  - Type and amount of substances used
  - If the work involves more than one substance, would the risk increase if these interacted
  - Safe handling, storage and transport of dangerous substances and of waste containing dangerous substances;
- Potentially high-risk activities such as maintenance;
- The effectiveness of control measures that have or will be taken;
- The likelihood of an explosive atmosphere occurring and its persistence;
- The likelihood of ignition;
- The scale of the fire or explosion and its effects;
- Damage to adjacent premises;
- Additional safety information required.
Within the Refrigeration, Air Conditioning and Heat Pump industry it is possible to split the activities into the following areas;

- Installation (High Risk);
- Operation (Low Risk);
- Service (Medium Risk to High Risk);
- Maintenance (Medium to High Risk);
- Repair and Decommissioning (High Risk);

Each operation listed above brings with it differing levels of risk. The levels indicated are merely an indication of the potential risk. The assumptions regarding likely risk rating are based upon the risk without sufficient control measures; the rating once suitable measures have been identified will obviously be reduced. As illustrated above, the area with the potential to have the lowest risk rating would be the operation of the plant or equipment as long as the equipment has been sized and selected in accordance with the relevant standards.

If a system containing a flammable refrigerant were to leak, and it can be ensured that the concentration of refrigerant/air mixture within the space does not reach the lower explosion or flammable limit, then this atmosphere is not flammable. Therefore the DSEAR requirements for risk assessment, zoning and co-ordination do not apply. However, if the equipment is installed in an environment that already requires zoning, then the DSEAR requirements for risk assessment, zoning and co-ordination will apply.

In real terms however, there will always be a possibility of a flammable mixture being present, albeit for a very short period of time. The is due to the fact that as the refrigerant leaks, at one point the refrigerant to air mixture will pass through the lower and upper flammability limits. BS EN 60079-10-1:2015 states that “in some cases a zone of negligible extent (NE) may arise and may be treated as non-hazardous. Such a zone implies that an explosion, if it takes place, will have negligible consequences”.

Another interesting note to be found within BS EN 60079-10-1:2015 states that “Experience has shown that a release of ammonia with a LFL of 15% by volume, will often dissipate rapidly in open air, so a flammable gas atmosphere will, in most cases be of negligible extent”.

When the equipment is to be installed or repaired/decommissioned, or in some cases serviced, then the risk increases due to the nature of the work involved. It is not the purpose of this document to cover the basic principles, or indeed to give a step by step guide on a standard risk assessment. Therefore, we will concentrate on the areas specific to DSEAR.

Work processes that will potentially require DSEAR specific assessments to be undertaken will include the following:

- Installation/repair of pipework using Oxy/Fuel systems;
- Pressure tightness and strength testing of pipework using a suitable inert gas;
- Use of solvent based cleaning materials;
- Use of adhesives;
- Flushing of contaminants from within the system;
- Adding/removing refrigerant from the system;
- Decanting oil from a refrigerating system.

The above list is by no means exhaustive and is only intended to illustrate the sort of activities where significant risk could occur.
If the risk assessment is carried out correctly it will enable employers to identify and carefully examine all dangerous substances that are present or likely to be present within the workplace. This information will enable the employer to reduce the risks, so far as reasonably practicable. Recording the findings of the risk assessment will in turn demonstrate that the employer has thoroughly considered the risks to the safety of his employees and others.

 Employers should carry out hazardous area classification as part of the risk assessment to identify places within the workplace where controls over potential ignition sources are needed and also those places where no risk is present. Employers would also need to consider how this will affect existing and future fire precautions.

Hazardous substances used in workplace will include:

- Substances handled, stored and used for processing;
- Those produced or given off by a process or activity, or as a result of an incident or accident;
- Any used for or arise from maintenance, cleaning and repair work;
- Substances produced as a by-product of any work or process;
- Any substance naturally occurring in the workplace;

Hazardous properties of substances used must be assessed. These substances could include the following:

- HFC Refrigerants;
- HFO Refrigerants;
- CO₂;
- Hydrocarbons;
- Ammonia;
- Oxygen free nitrogen;
- Trace Gas (Nitrogen/Hydrogen mix);
- Oxygen;
- Acetylene;
- Propane;
- Butane;
- MAPP Gas;
- Solvents;
- Adhesives;
- Paint.

The above list is by no means exhaustive and is only intended to illustrate a range of potentially dangerous substances.

Information on the dangerous substances used with the workplace can be found by consulting material safety data sheets. Safety data sheets should be kept by the employer and the contents within communicated with all relevant members of staff. These will need to be reviewed periodically to ensure that they are current.
When considering the potential for the release of dangerous substances, the following should be included:

- Unavoidable releases, such as purging of air from oxy/fuel brazing equipment;
- Intentional releases, such as propellant from aerosol leak sprays;
- Foreseeable releases, leaks from refrigerant cylinders whilst charging/recovery.

When assessing the potential risk when undertaking any of the work practices, the employer must assess whether an explosive/flammable atmosphere is likely to form and for how long. This part of the assessment is potentially the most problematical. Within the HSE Dangerous Substances and Explosive Atmospheres Regulations approved code of practice (ACOP) it does state that a dangerous substance travelling through a seamless pipe, that is well maintained, is extremely unlikely to leak and therefore should not be considered as hazardous. Therefore, any refrigerant within pipework or a brazed heat exchanger is unlikely to be considered as a possible leakage point for the purposes of the assessment.

Other parts of the system and those jointed by non-permanent means are required to be assessed for likelihood and potential for leakage.

Risk assessments looking at a range of refrigeration systems and the likelihood of leakage and potential effects have been published and are a useful source of information when determining the risk of a particular installation.

**Review of the risk assessment**

Employers should review their risk assessment at regular intervals, dependent upon the nature of the risk. If any major changes are made with regard to the process or substances used, then the risk assessment would need to be reviewed. Employers commonly note the next planned review date each time the risk assessment has been reviewed.

The HSE ACOP states that changes in the workplace which should require a risk assessment to be reviewed may include:

- Changes to the substances used;
- Replacement or modification to the plant and/or equipment used;
- Changes in processes or methods of work which could affect the nature of hazards and risks;
- Changes to the workforce;
- Adverse events such as accidents, dangerous occurrences or near misses should be a trigger for reviewing the original risk assessment.

**Consideration of ignition sources**

Part of the risk assessment is to identify potential ignition sources. As with all risk assessments, the likelihood and severity of the result should be considered.

The ACOP requires that we consider the following forms of energy as ignition sources:

- heat;
- electrical;
- mechanical;
- chemical.
The following table shows characteristics of some of the refrigerants that may be required to be assessed (table kindly supplied by Chemours).

<table>
<thead>
<tr>
<th>Refrigerant</th>
<th>Classification</th>
<th>Sat Temp °C</th>
<th>Practical Limit kg/m³</th>
<th>LFL kg/m³</th>
<th>LFL %</th>
<th>UFL kg/m³</th>
<th>UFL %</th>
<th>Density kg/m³</th>
<th>MIE mJ</th>
</tr>
</thead>
<tbody>
<tr>
<td>R600a</td>
<td>A3</td>
<td>-11.8</td>
<td>0.011</td>
<td>0.043</td>
<td>1.8</td>
<td>0.203</td>
<td>8.4</td>
<td>2.44</td>
<td>0.25</td>
</tr>
<tr>
<td>R290</td>
<td>A3</td>
<td>-42.1</td>
<td>0.008</td>
<td>0.038</td>
<td>2.1</td>
<td>0.192</td>
<td>10.1</td>
<td>1.83</td>
<td>0.25</td>
</tr>
<tr>
<td>R1270</td>
<td>A3</td>
<td>-47.6</td>
<td>0.008</td>
<td>0.046</td>
<td>2</td>
<td>0.253</td>
<td>11.1</td>
<td>1.74</td>
<td>0.28</td>
</tr>
<tr>
<td>R170</td>
<td>A3</td>
<td>-88.6</td>
<td>0.0086</td>
<td>0.038</td>
<td>3</td>
<td>0.253</td>
<td>12.4</td>
<td>1.24</td>
<td>0.24</td>
</tr>
<tr>
<td>R152a</td>
<td>A2</td>
<td>-24</td>
<td>0.027</td>
<td>0.130</td>
<td>3.9</td>
<td>0.563</td>
<td>16.9</td>
<td>2.76</td>
<td>0.38</td>
</tr>
<tr>
<td>R32</td>
<td>A2L</td>
<td>-51.7</td>
<td>0.061</td>
<td>0.307</td>
<td>14.4</td>
<td>0.680</td>
<td>29.3</td>
<td>2.15</td>
<td>30-100</td>
</tr>
<tr>
<td>R1234yf</td>
<td>A2L</td>
<td>-29.5</td>
<td>0.058</td>
<td>0.289</td>
<td>6.2</td>
<td>0.573</td>
<td>12.3</td>
<td>4.77</td>
<td>5k-10k</td>
</tr>
<tr>
<td>R1234ze</td>
<td>A2L</td>
<td>-19</td>
<td>0.061</td>
<td>0.303</td>
<td>7</td>
<td>0.443</td>
<td>9.5</td>
<td>4.77</td>
<td>61k-64k</td>
</tr>
<tr>
<td>R454A</td>
<td>A2L</td>
<td>-48.3</td>
<td>0.056</td>
<td>0.278</td>
<td>8</td>
<td>0.522</td>
<td>15</td>
<td>3.34</td>
<td>300-1k</td>
</tr>
<tr>
<td>R454C</td>
<td>A2L</td>
<td>-45.9</td>
<td>0.059</td>
<td>0.293</td>
<td>7.7</td>
<td>0.569</td>
<td>15</td>
<td>3.78</td>
<td>300-1k</td>
</tr>
</tbody>
</table>

- Classification from ISO 817.
- Saturation temperature (boiling point) measured in °C at standard atmospheric pressure.
- Practical limit - the limit that, if exceeded, is deemed unsafe for occupants and might lead to asphyxiation measured in kg/m³.
- LFL (lower flammability limit) also known as LEL (lower explosion limit) - the minimum quantity of the substance, mixed with air, required to create a flammable mixture measured in kg/m³. LFL is also given in percentage terms (at 23°C 50% relative humidity (% volume/volume)).
- UFL (upper flammability limit) also known as UEL (upper explosion limit) - is the maximum quantity of the substance mixed with air, required to create a flammable mixture measured in kg/m³. UFL is also given in percentage terms (at 23°C 50% relative humidity (% volume/volume)).
- Density of the refrigerant at standard atmospheric pressure and 21°C.
- MIE (minimum ignition energy) in mJ.

Other considerations with regard to the potential for damage of hazardous substances could include:

- Burning Velocity, flame propagation speeds in cm/s
- Auto Ignition Temperature
- Heat of Combustion, heat released kilojoules (kJ) when 1kg of the substance is completely burnt in air.
Elimination or reduction of risk

It is the responsibility of the employer to eliminate the risk if possible. If this is not achievable then the risk should be reduced so far as is reasonably practicable.

With regard to the refrigerant used within the system, it is not always possible to eliminate this, other than using a secondary fluid to control the environment (water, air etc.). If elimination is not possible then substitution shall be considered next.

This could involve the employer replacing a system which has a relatively high-risk rating to one with a lower risk e.g. replacing a system with an A3 refrigerant with a system with an A2L. If the main concern was during maintenance work, then substituting acetylene as the fuel gas with propane for example.

Other ways of reducing the risk when undertaking the servicing and maintenance of refrigeration, air conditioning and heat pump systems would be to minimise the amount of the dangerous substance. Consideration should be made also to the temporary storage of such materials on site. If this is required, it may affect any existing risk assessment. Any substances should be stored in suitable cabinets or bins, located in designated well ventilated areas. Flammable substances should be stored separately from other substances that may increase the risk of fire.

The hierarchy of mitigation measures

The following list is from the HSE DSEAR ACOP. The list is in order of priority:

- Reduction of the quantity of dangerous substances to a minimum;
- Avoidance, or minimising, of the release of a dangerous substance;
- Control of the release of a dangerous substance at source;
- Prevention of the formation of an explosive atmosphere, including the application of suitable ventilation;
- Ensuring that any release of a dangerous substance which may give rise to risk is suitably collected, contained, removed or otherwise rendered safe;
- Avoidance of:
  - ignition sources including electrostatic discharges;
  - adverse conditions which could cause dangerous substances to give rise to harmful effects;
  - segregation of incompatible dangerous substances.

Ventilation

If the elimination or minimisation cannot be achieved and the system has the potential for leakage and pooling of the dangerous substances then ventilation may be required. If possible, natural ventilation should be utilised. For example, if all of the refrigeration containing parts are located in a machine/plant room, then a suitable number of vents should be in the walls of the room at low and high level.
Hierarchy of ventilation control

- Locate in open air. Where weather protection is required, it should be designed to prevent the accumulation of dangerous substances;
- Adequate natural ventilation for any potential source of release inside any enclosure or building where the flow of air is liable to be restricted. The ventilation should be designed to dilute the concentration of foreseeable releases of dangerous substances to a safe level by maintaining the average concentration during normal operations to below that which could form an explosive atmosphere;
- Enclosure within a cabinet or other suitable enclosure which is constructed of fire resisting materials and directly provided with local exhaust ventilation (LEV) to a safe place;
- Adequate LEV, provided and positioned to prevent or minimise releases of potentially unsafe concentrations, into the work area or room;
- Adequate mechanical general ventilation to the workspace in the event that closely positioned LEV is either not reasonably practicable or is insufficient by itself to dilute concentrations of releases of dangerous substances to a safe level.

Systems of Work

Employers should ensure that there is a system of work that ensures that the control measures for a particular activity are properly understood and implemented and that an appropriate level of control is in place.

The level of control will depend on the risks associated with the activity and may be based on simple operating procedures, safety method statements or a permit-to-work system.

Operating procedures (low-risk activities)

For low-risk activities adequate control measures should be implemented through supervision or a system of work that may include the use of written operating procedures.

Low-risk activities are those activities that do not increase the level of risk associated with the work normally carried out in that area. They do not, for example, introduce ignition sources into the work area or create a risk of releasing dangerous materials. They may include:

- routine cleaning operations;
- dealing with small leaks and spills during normal manufacturing or handling operation;
- routine machine and equipment adjustments.
Safety method statements (medium-risk activities)

For medium-risk activities the employer should ensure that appropriate control measures are implemented through the use of safety method statements.

Medium-risk activities include maintenance, repair and service activities carried out by employees and contractors within or near to hazardous areas or on plant or equipment containing a dangerous substance.

They may involve work that releases small quantities of dangerous substances but they should not have the potential to release a significant quantity. A 'significant quantity' is considered to be one that could create explosive atmospheres beyond the hazardous areas already designated for the installation or one that could affect the health and safety of others on or off the site. Medium-risk activities are also those which do not introduce ignition sources into hazardous areas.

Such activities may include:
- Leak testing tanks and lines;
- Hot work in areas where there are only small quantities of dangerous substances present that do not give rise to hazardous places.

A safety method statement is a written procedure to cover a particular non-routine task. As well as specifying the work to be done it will also identify the hazards associated with the work and the measures necessary to control those hazards. For repetitive tasks a generic safety method statement can be used and, where necessary, modified to take into account job-specific requirements or deviations. Safety method statements are inappropriate for high-risk activities which should be subject to a permit-to-work system. However, safety method statements may be incorporated into the permit-to-work system.

The safety method statement, whether it is prepared in-house or by outside contractors, should be clear, concise and contain the following information:

- Description of the task and where it is to be carried out;
- Sequence and method of work;
- Hazards identified during the risk assessment;
- Skills required to deal with the hazards;
- Control precautions;
- Specific safety procedures;
- Details of isolations and related control procedures;
- Details of tools and equipment to be used;
- Method of disposal of waste and debris;
- Details of the state or condition in which the plant or equipment will be left at the end of the activity.
**Permit-to-work systems (high-risk activities)**

Where the proposed work is identified as a high-risk activity, employers should ensure that strict controls are in place and that the work is only carried out against previously agreed safety procedures. This should include implementing a permit-to-work system issued by a responsible person. They should be sufficiently knowledgeable about permit systems and the materials, processes, plant and equipment associated with the proposed work to be able to identify all the potential hazards and precautions.

High-risk activities are those where the foreseeable consequences of an error or an omission could result in immediate and serious injuries, e.g. an explosion or a fire that immediately affects people or traps them. They will normally include:

- Brazing, particularly on parts of the systems that have previously contained refrigerant;
- Carrying out hot work or introducing ignition sources in areas that are normally designated as hazardous;
- Work carried out in confined spaces;
- Breaking into the refrigeration plant

Guidance on permit-to-work systems may be found on HSE’s website at [http://www.hse.gov.uk/safemaintenance/permits.htm](http://www.hse.gov.uk/safemaintenance/permits.htm) and in Guidance on permit-to-work systems HSG250.

A permit-to-work is a documented system that allows specified personnel to carry out specific work within a specified time frame. It details the precautions required to complete the work safely and should be based on a suitable and sufficient risk assessment. It will describe what work will be done, how it will be done and by whom.

The permit-to-work requires affirmations from the person authorising the work and from the person carrying out the work. Where necessary it will also require a declaration from those involved in shift handover procedures or extensions to the permit to work. Once the work has been completed it will require a declaration from the originator of the permit that the work is complete and that the plant is ready for normal use.

The permit-to-work should be clearly laid out and easily understood by all parties. It should be designed to allow for use in unusual circumstances and detail procedures for suspension of the work, if required.

As well as detailing the precautions that need to be taken to prevent a fire or explosion, the permit-to-work should cover the precautions that are required to control health hazards and where necessary the hazards arising from entry into confined spaces, electric shock, high-pressure systems and contact with moving equipment.
Hot Work

Hot work and maintenance processes that involve the application of heat such as brazing should be eliminated wherever reasonably practicable. However, if it is not possible to do so, before work commences employers should carry out the following:

- Carry out a specific risk assessment;
- If the systems have been previously charged with a refrigerant, ensure that all refrigerant is removed from the area where heat will be applied;
- Ensure that the system is suitably purged with a suitable inert gas prior to undertaking any hot works;
- Ensure that the purge gas is discharged in a safe well-ventilated area;
- Use a suitable flammable gas detector at all times;
- All hot works must be undertaken by trained competent persons;
- All hot work must be undertaken under a strict permit to work system.

Hazardous area classification

Regulation 7 of DSEAR requires competent identification of hazardous and non-hazardous zones before the work commences.

Hazardous places are classified in terms of zones. This description is based upon the frequency and duration of the occurrence of an explosive atmosphere.

The principle behind zoning is to analyse and classify the areas where explosive/flammable atmospheres could occur and therefore, select proper equipment to be used safely in that environment. Once this is complete equipment with a higher equipment protection level may be required.

Zone 0
A place in which an explosive atmosphere consisting of a mixture with air of dangerous substances in the form of gas, vapour or mist is present continuously, or for long periods, or frequently.

Zone 1
A place in which an explosive atmosphere consisting of a mixture with air of dangerous substances in the form of gas, vapour or mist is likely to occur in normal operation occasionally.

Zone 2
A place in which an explosive atmosphere consisting of a mixture with air of dangerous substances in the form of gas, vapour or mist is not likely to occur in normal operation but, if it does occur, will persist for a short period only.

In some cases, a zone of negligible extent (NE) may arise and may be treated as non-hazardous. BS EN 60079-10-1:2015 notes that indications of the frequency of the occurrence and duration may be taken from codes relating to specific industries or applications.
The Air Conditioning, Heating, and Refrigeration Institute of America (AHRI) and The Japan Society of Refrigerating and Air Conditioning Engineers have independently published comprehensive reports documenting risk analysis.

AHRI have computational fluid dynamic modelling for R1234ze and R32 installed in a variety of applications. The Japanese publication follows a similar methodology to assess the risk in using a low flammable refrigerant within a wider range of applications. These documents are valuable resources when undertaking hazardous area classification and when calculating the likelihood and severity of a leak.

The standard also details a complete methodology for the zoning of hazardous areas and calculating dispersal areas.

Drawings of the workplace illustrating the zoning areas are usually required.

When considering zoning of the workplace the zoning may change temporarily due to maintenance requirements. There is no specific requirement to draw up revised area classification when undertaking short term maintenance or repair of systems; however, an appropriate risk assessment is necessary.

The following flow charts are variants on those within BS EN 60079-10-1:2015. They illustrate the process for assessing the zoning requirements. We have included the initial process chart which ends with a link to either:

- Continuous grade of release;
- Primary grade of release;
- Secondary grade of release.

The next, more detailed flow chart shows the steps requires based upon “Secondary grade of release”. This is likely to be the most common path when dealing with the installation, operation, servicing and maintenance of refrigeration, air conditioning and heat pump systems, however more information on “continuous and primary grades of release” are to be found in Annex F of BS EN 60079-10-1:2015.

Once a hazardous area has been identified, it should be identified in the form of a drawing; examples can be found within Annex E of BS EN 60079-10-1:2015.

The drawing will include information on the following:

- Hazardous areas and zones;
- Extent of the zones in both plan and elevation view;
- Includes information on:
  - the substances involved;
  - the work activities;
  - other assumptions.

The drawing should be kept and maintained as part of the risk assessment process and review as required.
This is only a requirement when the assessment has identified the work environment as hazardous with regard to the potential of a flammable/explosion atmosphere occurring, and special precautions are required to protect persons within the workplace. If special precautions are not deemed necessary the workplace is deemed non-hazardous, but other parts of DSEAR are to be considered.

The term “special precautions” means precautions to control potential ignition sources within the hazardous area. The term “not expected to occur in such qualities” means that we need to consider the likelihood of a flammable/explosive atmosphere and quantity of the substance when considering the area classification. If the release of the flammable refrigerant from a system is highly unlikely to occur and if it was to happen the amount released is unlikely to form a flammable mixture then it would be unnecessary to classify the area as hazardous.

If the assessment concludes that new equipment and protective systems should be provided for use in places classified as hazardous, then the employer should only use equipment that is suitably rated. Further guidance can be found within:

- BS EN 13463-1 Non-electrical equipment for use in potentially explosive atmospheres. Basic methods and requirements
- BS EN 60079-14 Explosive atmospheres. Electrical installations design, selection and erection
- BS EN 60079-0 Explosive atmospheres. Equipment. General requirements
- BS EN 1127-1 Explosive atmospheres. Explosion prevention and protection. Basic concepts and methodology

When areas have been identified as hazardous, employers should either place signs indicating the locations where an explosive atmosphere may occur and the need for special precautions, alternatively they would need to able to demonstrate that other methods are employed to ensure that persons are alerted to the hazardous locations and special entry requirements.

The above symbol is the warning sign for places where explosive atmospheres may occur.
Schematic approach to classification

1. **Start**
2. Flammable substance container
   - **YES**
   - Does it contain a quantity of flammable refrigerant or gas which is capable of producing a dangerous volume of explosive gas atmosphere?
     - **NO**
     - NON HAZARDOUS AREA
     - **YES**
     - Are there any sources of release?
       - **NO**
       - NON HAZARDOUS AREA
       - **YES**
       - Can the sources of release be eliminated?
         - **YES**
         - The grades of each release must be determined
           - CONTINUOUS grade of release
           - PRIMARY grade of release
           - SECONDARY grade of release
         - **NO**
Schematic approach to classification for secondary grade release

SECONDARY grade of release

Can it be eliminated

YES → Non-hazardous area

NO → Parameters which affect the type and extent of zones must be evaluated (e.g. release rate, velocity, etc.)

The degree of dilution must be determined (indoor locations require background concentration assessment)

High

Can it be changed to High Dilution?

YES → Medium

NO → Low

Low

Can it be changed to Medium Dilution?

YES → Medium

NO → Medium

Medium

Can it be changed to High Dilution?

YES → High

NO → Medium

High

The availability of the ventilation must be determined

Good

Fair

Poor

The type of zone is determined

Zone 2 NE

Zone 2

Zone 2

(1) Non-Hazardous

Zone 2

Zone 2

Zone 2

(3)

Using an appropriate code or calculations determine the extent of zone

Using an appropriate code or calculations determine the extent of zone

Using an appropriate code or calculations determine the extent of zone

The availability of the ventilation must be determined

Good

Fair

Poor

The type of zone is determined

Zone 2

Zone 2

Zone 2

(3)

Using an appropriate code or calculations determine the extent of zone

The availability of the ventilation is not considered

The type of zone is determined

Zone 1 & Zone 0

(2)
Note 1 Zones NE indicate the theoretical zones which would be of negligible extent under normal conditions.

Note 2 Will be Zone 0 if the low dilution is so weak and the release is such that in practice an explosive atmosphere exists virtually continuously i.e. approaching "no ventilation" condition.

Note 3 The zone 2 area created by secondary grade of release can exceed that attributable to a primary or continuous grade of release.

This guidance was prepared by Business Edge Ltd on behalf of, and in conjunction with, a number of FETA groups.