Situation: I was doing a safety audit walk-round, with the facility manager, of a shore terminal in January. The country had a continental climate with short, cold winters from December to early March. During the visit, the temperature was 10 degrees below zero Celsius. The terminal consisted of separation tanks and storage facilities, a loading bay for rail transport, and pumping facilities for an oil pipeline. The terminal was at least 20 years old.

I noticed that the water deluge pipework (10cm diameter steel pipes, for fire-fighting) was neither lagged nor trace heated. It was quite obvious that the deluge system would not work in the current conditions.

I asked the facility manager “How often do you test the deluge system?” He replied “Every month”. I said “When did you last test it?” He answered (quite nonchalantly) “Oh, we don’t test it during the winter.”

They didn’t test the system because they knew it wouldn’t work. This was one of those cases where you shake your head in disbelief.

Moral: People can ‘bend’ rules to suit themselves, and yet have a clear conscience. The only way to ensure compliance with procedures and rules is to have someone independent there to do periodic audits.