

COMAH: ARE YOU ABLE TO KEEP PACE WITH THE CHANGES?

Hot Topics

There are certain issues that are currently emphasised in the Competent Authority intervention strategies at COMAH sites. These 'Hot Topics' arise from the trends found during intervention visits, or lessons learnt from worldwide major incidents. Our dedicated team of engineers and consultants are fully conversant with all of the issues below.

CONTAINMENT

Does your site meet the Competent Authority's 'Containment Policy' relating to the bulk storage of hazardous liquids?

Can you demonstrate that your vessels, bunding arrangements and tertiary containment arrangements are sound?

Containment is a crucial factor in preventing a major accident. It is important to understand the recent changes regarding accepted good practice and the implications for your installation.

VERIFICATION OF ADHERENCE TO STANDARDS

Does your processing equipment meet the latest standards, guidance and accepted good practice?

Do you know what the required performance standards are for your protective devices and are those standards being met? If you're unsure, our engineers can undertake a gap analysis on your behalf and make recommendations to make sure you comply where necessary.

PROCESS SAFETY MANAGEMENT (PSM) & PERFORMANCE INDICATORS (PSPI)

Using, storing, manufacturing, handling or transporting hazardous substances always carries the risk of release.

Process safety is about ensuring systems are in place to prevent the potential for release. When was the last time you reviewed your management systems? Do your systems drive you towards continuous improvement?

We are able to help you to understand where improvements can be made to your management systems for care of assets, and protection of people and the environment. We can provide training in process mapping, procedure development and validation of procedures.

The adoption of effective Process Safety Performance Indicators is an essential factor in the drive to prevent major accidents arising. We can help you to develop performance measurement systems using leading and lagging indicators - ask about our PSPI and PSM Masterclasses.

ASSET INTEGRITY MANAGEMENT & FUNCTIONAL SAFETY

How do you determine what type of inspection and testing regime is required and how often it should be done?

The application of a risk-based approach to inspection and testing can provide an opportunity to optimise resource usage to give improved performance without necessarily increasing the cost. We can develop asset registers for inspection purposes, identify safety critical equipment, identify business critical assets and develop appropriate examination and test protocols to meet the integrity requirements for continued safe operation.

EMERGENCY RESPONSE

What would you do if the worst happened?

Our personnel are experienced in the development of emergency response plans. We can help you to anticipate credible worst case scenarios and determine the most effective forms of response to protect people, the environment and your business.

HUMAN FACTORS

Human failure plays a role in 80% of accidents.

For COMAH sites, identification and assessment of human factors is an essential part of the risk assessment process. Site operators must understand which activities are critical to safe operation and what can be done to optimise human performance - ask about our Human Factors Masterclass.

If you would like our assistance or any further information, please do not hesitate to contact us.



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COMAH: Are You Able to Keep Pace with the Changes?

The Control of Major Accident Hazards (COMAH) Regulations 1999 were introduced with the aim of preventing and mitigating the effects of major accidents involving dangerous substances, which can cause serious damage or harm to people or the environment.

The Regulations were amended in 2005 to include the addition of new named substances; changes to some existing substances and generic categories of substance, including revising the qualifying quantities; and changes to the aggregation rule - this rule is used to determine if COMAH applies where single substances are present in quantities less than the qualifying quantities.

COMAH Regulations apply mainly to the chemical processing industry, but also to some storage activities, explosives and onshore oil and gas installations, depending on the quantities of dangerous substances being stored or used. HFL Risk Services has a wealth of experience in this major area of legislation.

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Meeting the Challenges of COMAH

We can assist with all aspects of the process of COMAH compliance, including notification and application for Hazardous Substances Planning Consent; risk assessment; preparation of the Safety Report; and ongoing support during the intervention process.

COMAH Reviews

Regulation 8 of the COMAH Regulations requires operators of top tier sites to review and revise their Safety Reports as changes occur on site, or at least every 5 years, to keep them up to date. Changes in assessment standards also need to be considered - Safety Reports need to be updated to reflect the current expectations of the Competent Authority.



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COMAH Safety Reports

We have been involved in COMAH from the very beginning and have completed many successful reports for a large number of leading companies. We understand exactly what the Competent Authority is looking for in a report and can help you all the way.

We can carry out a gap analysis against the COMAH Regulations; supply templates for your Safety Report; provide project management and peer review services; assist with the major accident risk assessment; or prepare the full Safety Report.

Our engineers and consultants have developed a methodology to enable the required demonstrations to be developed in a systematic and orderly manner. Shortfalls and areas for improvement are automatically captured as part of this approach, aiding improvement planning work, and making efficient use of time and resources.

The services we offer also include the preparation of re-submissions for those companies unfortunate enough to have had their Safety Reports returned.



Can you determine the 'extent and severity' from the major hazards on your site?

Could you demonstrate that the risks from your major accident hazards are ALARP?

Can you identify and assess all your major accidents to the environment (MATTEs)?

Don't worry if you can't because we have extensive experience in this area, having prepared Safety Reports for a significant number of the UK's top tier installations. Assignments have covered a wide range of sectors including chemical manufacturing sites, warehouses, tank farm installations and onshore oil and gas terminals.

Summary of Key Aspects

COMAH addresses the entire operation rather than isolated areas of plant. As such, it is necessary to demonstrate that:

- All Major Accident Hazards (MAH) have been identified
- The potential scenarios giving rise to, and the potential consequences of, a major accident are fully understood
- A Major Accident Prevention Policy (MAPP) and a Safety Management System (SMS) for implementing it have been put into effect
- Adequate safety and reliability have been incorporated into the design, construction, operation and maintenance of plant
- The necessary measures to prevent or limit the consequences of major accidents to people and the environment are in place
- On-site emergency plans have been drawn up taking into account interaction with off-site emergency services

The operators of top tier COMAH sites are required to present this information to the Competent Authority (CA) in the form of a Safety Report

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We are able to do the following:

- Determine if COMAH applies to your site
- Prepare a MAPP for a lower tier COMAH site
- Prepare a complete top tier Safety Report
- Review an existing Safety Report and revise it if necessary
- Carry out HAZID exercises to identify all potential major accident hazards on site
- Determine the proportionality of your site and carry out qualitative, semi-quantitative or quantitative risk assessments as appropriate
- Carry out consequence modelling
- Carry out environmental assessments and MATTE reviews
- Develop on-site emergency plans
- Ensure that adequate safety and reliability have been incorporated into the design, construction, operation and maintenance of plant
- Carry out cost benefit analyses for additional measures to determine if the risks are ALARP
- Assess your Safety Management System, especially the process safety elements, by auditing

We can provide templates, management services, guidance and peer review services to help you write your own Safety Report. Alternatively, we can prepare it for you, committing as little of your resource as practicable, whilst ensuring that you retain ownership of the report.

