

Engineers Ireland, July 16th, 2015

Challenges for CCA in COMAH Regs. Implementation

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Presentation Overview

- Consultation process
- Notification & Information to the public
- Inspection
- LUP

Consultation Process

- 13th August 2012 to June 1st 2015
- Regulatory Impact Assessment
- Draft Regulations published
- Public comments reviewed
- SI 209 of 2015 and Guide on June 1st 2015

Notification Under SI 209 of 2015

- All operators by June 1st 2016
- Prescribed form - Electronic
- Basic information
- Public Information
- Form in beta – ready for testing


Part 1 – General Information

Part 1 : General Information			
Data Type	Public	Required Information	
Reg. 8(a) - Operator Name	✓	Registered Name	
	✓	Trade Name	
	✓	Name of person in charge	
	✓	Position of person in Charge	
Establishment Address	✓	Address 1	
	✓	Address 2	
	✓	Address 3	
	✓	Address 4	
	✓	Address County	
	✓	Postal Code	
		Contact e-mail	
		Entrance Latitude (decimal degree)	=Pick= -- -- --
		Entrance Longitude (decimal degree)	=Pick= -- -- --

Notification Form Parts 2- 4

- Part 2 – Information for public website for all operators
- Part 3 – Information for public website – Upper-tier operators
- Part 4 – Information for land-use planning

Threshold Calculator

Operator Name		Enter Dangerous Substance Quantity (t) here	Lower-tier threshold (t)	Upper-tier threshold (t)	Seveso Category H for Health, P for Physical E for Environment			Other	Select					
Address 1					Enter data below									
Address 2														
Dangerous Substance														
42	Propylamine (see note 21)		500	2,000						H	P			==
43	Tert-butyl acrylate (see note 21)		200	500							P	E		==
44	2-Methyl-3-butenitrile (see note 21)		500	2,000						H	P			==
45	Tetrahydro-3,5-dimethyl-1,3,5,-thiadiazine-2-thione (Dazomet) (see note 21)		100	200								E		==
46	Methyl acrylate (see note 21)		500	2,000						H	P			==
47	3-Methylpyridine (see note 21)		500	2,000						H	P			==
48	1-Bromo-3-chloropropane (see note 21)		500	2,000	H		E		==					
H	Section H - HEALTH HAZARDS													
H1	ACUTE Toxic Category 1, all exposure Routes	4.0	5.0	20.0	H				==					
H2	Acute TOXIC, Cateogry 2, all exposure routes Acute TOXIC, Category 3, inhalation expoure(see note 7)		50.0	200	H				==					
H3	STOT SPECIFIC TARGET ORGAN TOXICITY - SINGLE EXPOSURE STOT SE Cat. 1	1.0	50.0	200	H				==					

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Notification Form

- Seeking beta-testers
- Pharma, Chemical Warehouse, LPG, Bulk Petroleum, Fertiliser
- Safety & Environmental professionals
- Fixed-duration working group

Inspection Under SI 209 of 2015

- Article 20/Regulation 22 – COMAH focus only
- Changing since 2013
- Information availability
- Need to separate out COMAH Inspection.
- Transparency

RCS Assessment System

Permit to Work	Operating Procedures
Hazard Identification and Risk Assessment	Selection & Management of Contractors
Examination and Testing of Safety Critical Plant	Plant Commissioning / Plant and Process Design
Emergency Response	Planned Maintenance Procedures
Management of Change	Assessing Auditing
Assessing Competence	Process Safety Performance Indicators
	Accident Investigation

Inspection Topics 2015 -

LOPA Assessment	MAPP Elements Assessment	Safety Performance Indicators Assessment
MAH issues brought forward from previous inspection	Public Information Check	Sector/topic checklists
RCS Assessment	Environment & domino Information check	Accidents & DO's follow-up
RCS Implementation Assessment	Safety Report follow-up	Human Factors & SCT Assessment
Notification / Inventory Assessment	Internal Emergency Plan Assessment	Other MAH issues

Inspection Topics

- Within the high level topics, variable sub-topics can be chosen for assessment by the inspector.

Topic	#	Topic	MAH Ref #	Assessment
MAPP Elements Assessment (Choose)	17	Element of MAPP selected for Assessment (Choose)		2. Identification and evaluation of major hazards
	18	a. normal operation -adoption and implementation of procedures for		
	19	b. abnormal operation -adoption and implementation of procedures for		
	20	c. Assessment of their likelihood and severity of major accidents		
	21	No Other		
	22	No Other		

Inspection Checklists

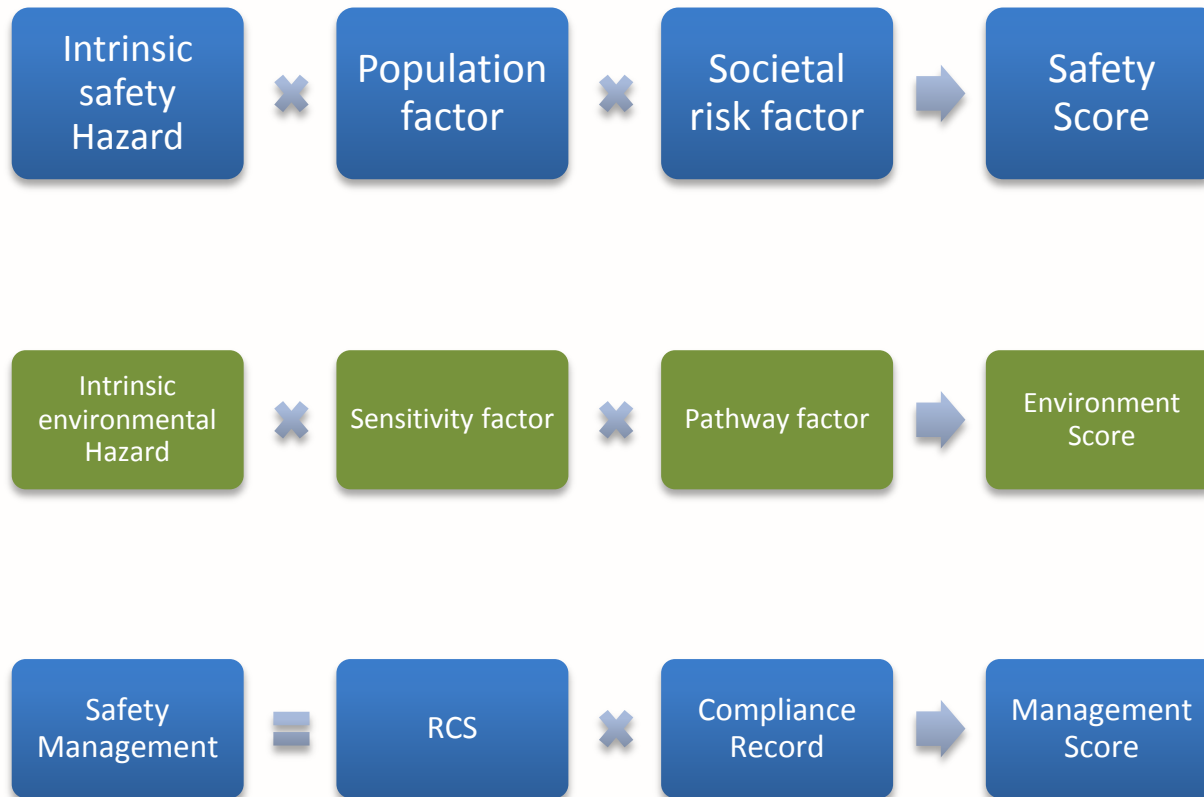
- Checklists will be used where appropriate to prompt on relevant issues and to 'score' the responses
- For example, emergency response plans/procedures might be an important prevention or mitigation layer:

Topic	#	Question / Issue	Yes/No/NA	Assessment Comments	Rating
		MAH Scenario under assessment		Bund Fire in Bund 5	
The ERP	1	Does the ERP address this particular MAH scenario?	Yes		20
	2	Are the objectives of the ERP team appropriately set out for this scenario?	Yes		20
	3	Are the duties of the ERP team appropriately set out for this scenario?	Yes		20
	4	Is the incident controller for the ERP identified in the ERP	No		40
	5	Are the number of personnel required for			

Scoring Checklist Compliance

Standard	Score
Best Practice	10
Good Practice	20
Generally Compliant	30
Some Compliance	40
Falls Short of Min. Requirement	50
Unacceptable	60

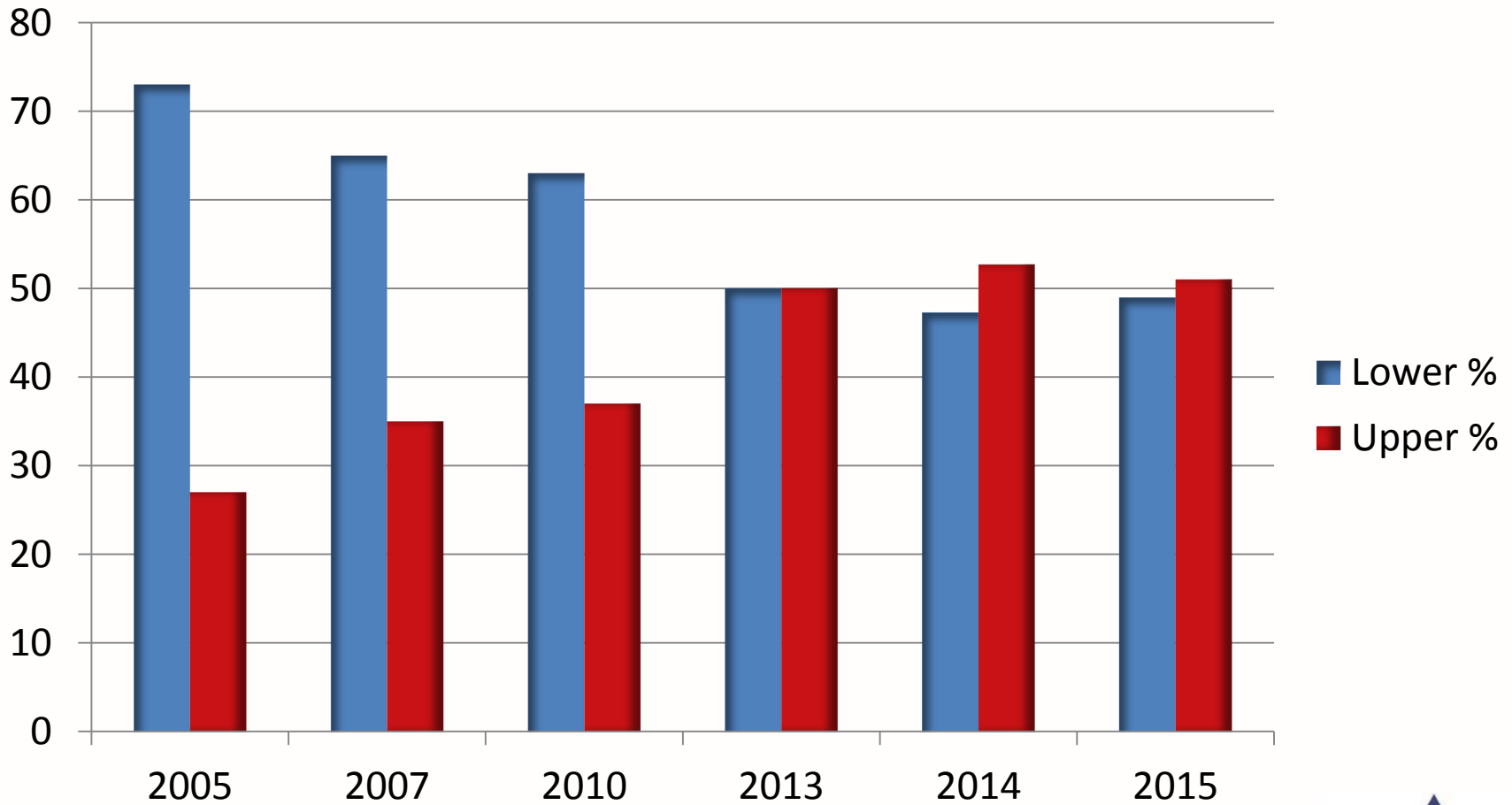
Risk Rating for Inspection




Modifications and LUP

- Articles 11, 13, 15
- Modifications – Regulation 12
- LUP – Regulation 24
- Planning & Development Regulations to be amended
- Consultation Distance
- Generic advice

Tier Breakdown




Check for updates!



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 - Notifications
 - Safety Report

Home > Your Industry > Chemicals > COMAH > Land Use Planning

Land Use Planning



Role of the HSA in Land-use Planning (LUP)

The Directive requires that controls are in place on developments at qualifying establishments and in their vicinity. The planning & development regulations implement this aspect of the Directive. The HSA are required to provide technical advice to the planning authorities, either on a case-by-case basis or generically. Advice provided to the planning authority should be available from them on application, and in many cases is on their websites. The final planning decision rests with the planning authority.

Consultation Distance

On being notified of the existence of an establishment, the Authority formally writes to the relevant planning authority, advising them of a consultation distance for the establishment. The Authority recommends that developments within this consultation zone should be referred to it, for technical advice.

"consultation distance" means a distance or area relating to an establishment, within which there are potentially significant consequences for human health or the environment from a major accident at the establishment, including potentially significant consequences for developments such as residential areas, buildings and areas of public use, recreational areas and major transport routes.

The Authority provides technical advice in response to a notice sent by a planning authority requesting technical advice on the effects of a proposed development on the risk or consequences of a major accident in relation to developments within the consultation distance and of the development type set out in Regulation 24(2).

The HSA has defined the boundaries of the Inner, Middle and Outer LUP zones around establishments, based on risk, as: