



## COMAH ASSESSMENT

The aim of the COMAH Regulations 1999 and subsequent amendments is to prevent major accidents involving dangerous substances in the workplace and to limit the consequences of any such accidents to people and the environment. There are legally binding requirements on all sites affected by this Regulation to ensure they have a Safety Management System (SMS) in place to prevent major accidents. For sites with large quantities of dangerous substances there is also a requirement to compile a safety report, issue this to a Competent Authority and draft an on-site emergency plan. This datasheet looks at the latest changes to COMAH and how they may affect your site.

### CONTROL OF MAJOR ACCIDENT HAZARDS REGULATIONS 1999

The EU Seveso II Directive (96/82/EC) has been implemented within the UK as the Control Of Major Accident Hazards (COMAH) Regulations 1999 which have been in force since April 1999. The COMAH Regulations replaced the previous Control of Industrial Major Accident Hazards or "CIMAH" Regulations.

COMAH applies to all sites that have qualifying quantities of dangerous substances as listed by name or classified under a generic hazard category within the Regulations. These qualifying limits or thresholds, as they are known, are set at two levels and referred to as Lower Tier and Top Tier.

Essentially, if you store, process or handle one or more dangerous substances as defined in the COMAH Regulations in quantities above a Lower Tier threshold then you are required to comply with the Regulations. Companies who exceed the Top Tier threshold are subject to additional compliance requirements. There are also aggregation rules that may qualify you as a Lower or Top Tier site even if individual inventories are below a threshold.

The European Union has adopted an Amendment Directive (2003/105/EC) to Seveso II. The UK COMAH Regulations have therefore been changed to reflect the Directive. Among the changes in the revision are the following:

- Inclusion within the scope of the Regulations of chemical and thermal processing associated with extractive industries, apart from those carried out off shore.
- Reduced thresholds for and inclusion of new categories of petroleum products as named substances.
- Inclusion of new named carcinogens such as hydrazine and dimethyl sulphate.
- Reductions in the qualifying thresholds for substances that are dangerous to the environment.

- Changes to the aggregation rules used to calculate thresholds.

As a result of these amendments more sites now come within the scope of COMAH.



### DEMONSTRATING COMPLIANCE

The minimum requirements for a COMAH site are to:

- Prepare and implement a Major Accidents Prevention Policy (MAPP). The MAPP should be updated to reflect changes to the site and new information on the dangerous substances present.
- Notify the Competent Authority of the presence and inventory of dangerous substances on the site, and make them aware of any changes.

Top Tier establishments are required to submit a Safety Report to the Competent Authority, amongst other additional duties. In the case of new establishments (i.e. new sites), the Safety Report has to be submitted in two stages: one before construction and the other before commissioning. However, establishments to which the Regulations applied at the time they first came into force, would have been expected to submit a Safety Report by the beginning of 2002 at the latest. The Safety Report should include a detailed assessment of the risks associated with the dangerous substances, as well as the prevention and protection measures employed to minimise the risks.

Once a Safety Report has been written and submitted, it should be regularly reviewed and updated it to ensure it is kept current. A formal review is required under COMAH every five years that will require a resubmission of any changes to the Competent Authority. Organisations that submitted COMAH Safety Reports in 1999 or 2000, when it was first introduced, are required to perform a five-year review. A formal review is also required in the light of new knowledge about major hazards or when there are changes to the site safety management system (SMS).

Under COMAH Top Tier sites have an additional obligation to prepare an on-site emergency plan, keep the general public informed of their hazardous activities and to provide the public with guidance on what to do in an emergency. They must also report all major accidents to the Competent Authority.

### HOW CHILWORTH CAN HELP

Chilworth Technology has a wealth of knowledge from working within the process industries on storing, processing and handling potentially dangerous, toxic and flammable materials. Our COMAH services cover:

#### Safety Reports

- Compilation of all or part of a Safety Report based on the requirements of the HSE or other Competent Authority.
- Identification of potential major accidents.

- Evaluation of potential triggering events for a major accident, including fire and explosion risk assessments.
- Consequence and impact analysis of potential major accidents using propriety models; including the effects of fires, explosions, releases of toxic materials, as well as environmental impacts in relation to guidelines from the Environment Agency etc.

#### Safety Management Systems (SMS)

- Assistance with the development of an effective Major Accident Prevention Policy (MAPP) and underlying SMS.
- Technical and Cultural auditing of SMS.
- COMAH health check as part of your 5 yearly submission review or following major changes to processes or systems.

#### Emergency Planning

- Assistance with the development of on-site emergency plans, including the identification of suitable worst-case scenarios and the measures required to safely deal with them.

#### Other related services

- Accident investigation.
- Technical reviews of relevance to COMAH i.e. IEC 61508/11, fire and explosion (DSEAR), chemical reaction hazard.

*faxback*

Please faxback to Marketing on +44 (0)23 8076 7866

Dr/Mr/Mrs/Ms/Miss:..... Job Title:.....

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#### **My particular interests are:-**

COMAH .....  DSEAR Audits.....

Chemical Reaction Hazards.....  IEC 61508/11 Functional Safety.....

Regulatory Testing .....  HAZOP.....

Electrostatic Hazards / Problems .....  Hazardous Area Classification.....

Incident Investigation / Expert Witness .....  Training.....

I would like a FREE and confidential telephone call with a consultant about a process safety matter.....

I would like a FREE visit from a consultant next time one is in my area .....

*For further information phone Chilworth Technology on +44 (0)23 8076 0722*

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