



REPORT TITLE Review of Accident Management Plan (**Section 2.8**)
INSTALLATION NAME Shotton Works
PERMIT NUMBER BR7321
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DATE 10/11/2013

1.0 INTRODUCTION

Environmental Permit BR7321 requires a regular review of the Accident Management Plan submitted as part of the original IPPC Application. This document has been prepared to satisfy that requirement.

2.0 ACCIDENT MANAGEMENT PLAN

The Accident Management Plan is described as comprising three fully documented systems:

- Safety Management System (SMS)
- Environmental Management System (EMS)
- Major Accident Prevention Policy: Control of Major Accidents Hazards (COMAH)

Modifications to each are identified in the following sub-sections.

2.1 SAFETY MANAGEMENT SYSTEM

The Safety Management System represents a comprehensive framework applicable to all aspects of the manufacturing process (normal operation, maintenance, design and construction).

The basic system, aims and principles described in **Section 2.8** of the IPPC permit application remain unchanged, however, a new Tata Health and Safety Management System has been implemented across all Tata Companies worldwide. This System includes elements focusing on Health, Safety and Emergency Response, but has improved focus on Process Safety Hazard Management.

In January 2012 two new tools were introduced under the Risk Management element of the Health & Safety Management System. These tools comprised of; a paper-based risk assessment "4 What's" and a Risk Management Database with an integral pro-forma for Management of Change (MOC) activities. It is possible within the new database to establish the additional control measures, which might be required prior to/during or following a change as well as a completion date. These are being tracked and monitored.

The Safety Management System is no longer certified to the ISRS (International Safety Rating System) standard, but is now audited to the OSHAS 18001 standard by LRQA.

MONITORING RETURNS N. WALLS

CHECKED & AUTHORIZED

TRACING

OK FOR PUBLIC REGISTER

INITIALS	DATE
AS	8/11/14
JB	15.11.13
AS	8/11/14
JB	Edem



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2.2 ENVIRONMENTAL MANAGEMENT SYSTEM

The basic structure of the Environmental Management System remains unchanged as described in **Section 2.8**. The system has however been transferred from a document based Lotus Notes Database (Triangle) to a flowchart-based system (Nimbus Control 2007).

2.3 COMAH

Threshold quantities are monitored and indicate that the site remains to be a lower tier COMAH site. A Major Accident Prevention Plan is in place. Process Hazard Assessments have been completed. These have identified potential environmental accident scenarios around loss of containment of chromate and firewater. An action plan has been developed to address identified potential hazard scenarios having a high potential to cause significant impact. A programme of works is underway to close out identified corrective actions

2.4 EMERGENCY PLANNING

The basic structure of the site emergency (INDASTER) plan remains the same:

- Phase 1 – preliminary action
- Phase 2 – major incident imminent
- Phase 3 – major incident declared
- Phase 4 – termination of incident

Roles and responsibilities are defined, and changes have been made to the documented system to better highlight these roles and responsibilities. Training has been carried out with persons in key roles.

The environmental contingency plan defined in **Section 2.8** of the original IPPC application document is also in place.

3.0 CONCLUSION

The site accident plan, comprising the systems described in **Section 2.8** of the original IPPC application is still in place, with changes described above.

Measures that have been implemented since the original submission include;

- Completion of a Process Hazard Review Programme;
- Transition from a Lotus Notes based EMS (Triangle) to a process-based documented quality, safety and environmental integrated management system.
- Introduction of a "4 What's" Risk Assessment
- Introduction of an electronic Risk Management Database (January 2012)
- Introduction of an electronic Management of Change Database (January 2012)

