

Minutes of HSE Meeting in Manchester on 11th Sept.2003.

Subject: Work shop for the prevention of falls from Road Tankers.

The meeting was chaired by Mr D Kyle (HSE) .There was approx. 25 people present from various road tanker manufactures, walkway/handrail manufactures, chemical companies and HSE officers. ITCO was represented by Mr C Humphreys (UTS) and Mr J. Hopkins (ITCO). A list of participating people was not available.

The agenda was as follows:

Introduction and recap of previous work shop on 10/6/03.

Physical standards applicable to -Walkways, Guard Rails, Access Ladders. Management Standards- Training, inspection and records.

A draft information document 18/12/02 from HSE was presented as the basis of the meeting. (See attached)

This document made it very clear that it related to road tankers only.

It included a paragraph that a statement should be included in this document that it does not apply to tank containers and swap bodies.

ITCO commented that the wording in this document is not consistent when referring to `tanks' as it leaves it open to differing interpretations.

It was proposed that `road tanker' only be used.

ITCO also stated that whilst the proposed standards are intended for road tankers there will be some overlapping on to tank containers and therefore containers standards should be considered.

DK stated a new draft relating to tank containers and swap bodies would be prepared after consultation with all interested parties.

Any overlapping standards common to road tankers should be tried to be incorporated, I.E. Walkway widths, ladder dimensions etc.

The July Edition of the Statutory Instrument No.2003 Health & Safety-The Working at Height Regulations was presented.

A consultative draft will be available in Nov.2003 for comments within 3 months. It is expected that the final draft will be laid before parliament early 2004 and become law in the UK next year. European regulations will align with the final agreed draft.

It is intended that this Statutory Instrument will cover all industries and pieces of equipment when personnel are required to work at heights.

There is a noticeable amendment from the previous drafts that the `above 2 metres' reference has been deleted.

`Working at Heights' is now any distance that a person could fall that is liable to cause personal injury.

Walkways (Road tankers)

The LTK- HSE proposal is as follows:-

(a) 900mm wide if all round access is required.

(b) 600mm wide if one sided working is required.

450mm wide if on one side of tanker substantially below the top of the vehicle.

Road tanker manufactures were asked to submit their comments regarding this proposal. It was stated that the proposal was taken from the European Standard EN 13094.

ITCO stated that the tank container standard is 400mm wide, but every manufacturer has differing layouts level with the top of the ISO framework.

I would suggest our manufacturing members send me an A4 drawing detailing the sizes and standard walkway layout for their standard frame design.

It would help our arguments if we can show an industry consistency when the tank container standard is proposed.

Materials of construction & type of walkways were discussed. It would seem that HSE may specify a minimum micro roughness of 20 microns or above for the walkway surface. Walkway manufacturers may have to certify the slipperiness of the walkway surface using the methodology in 'UK Slip Resistance Group Guidelines FI522'

Quote from working paper:

Were there is a risk of tools being inadvertently pushed off open sides of walkways there shall be protected by an up stand or toe board of not less than 100mm high.

ITCO advised tank containers walkways are always level with the top of the ISO frame to prevent trip hazards and as we are not allowed to project above the game it is impossible to comply with this section.

An answer was received that ia risk assessment would be required if no toe board was fitted. IE Nobody working below. Fenced off areas etc.

Ladders

Rung spacing proposed as 225mm to 255mm and to be equal spaced.

Bottom rung to be no more than 550mm from ground.

Minimum dimension behind each rung to be 230 mm.

Top rung to be level with walkway.

Ladder width to be 380mm td 450mm.

Rung loading 1.5kN per rung.

All dimensions are taken from BS 5395-3 1985.

Ladders shall not be attached Ito the pressure vessel.

ITCO advised it was not possible to comply with certain dimensions proposed.

ITCO to confirm our industry standards.

Information requested from ITCO manufacturers on an A4 ladder drawing illustrating:

Ladder widths,

Depth behind ladder rungs (max. /min. to insulation)

Height to bottom rung.

Rung spacing.

Handrails.

HSE proposal:

Handrails to enclose the walkway on all 4 sides except for access to the ladder.

Handrail heights to be 1100mm with mid rail height intermediate protection.

The handrail should be capable of being erected without undue physical effort from ground level.

Handrails that can only be erected or stowed while standing on the walkway create an increased risk of a person falling and therefore should not continue in use.

The handrail shall be of adequate strength?

Heights were discussed : BS require 1100mm, European require 100mm

Proposal : 950mm minimum with 470mm max. Between upper & intermediate rails.

No design criteria for safe working loads or testing are available within the industry at present.

HSE request manufacturers of tankers & handrail systems to perform tests and submit their findings.

There maybe a provision within the new draft for the retrofitting of handrails complying with the new regulations.

Objections to the new draft document are possible.

ITCO advised the many reasons why ISO tank containers should be exempted from fitting handrails.

HSE replied recommendations will be made from the tank container project group.

The HSE project leader for this group is

Mr Andrew Murray,
HSE-Land Division
St Anne's House
Stanley Precinct
Bootle
Merseyside L20 3RA.

ITCO are to arrange a site visit for Mr Murray to a UK tank manufacturer.
I have spoken to UBH who allow a visit following a briefing from myself.

Jack Hopkins - 01/10/2003 .