



**W.H.KEYS LIMITED**

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16<sup>th</sup> December 2004

Environment Agency  
Sentinel House  
Wellington Crescent  
Fradley Park  
Staffs  
WS13 RR

14761

For the attention of [REDACTED] - PIR/RSR Inspector

Dear Sir

Re: COMAH VISIT 22<sup>nd</sup> DECEMBER 2004

Further to your letter dated the 5<sup>th</sup> November 2004 regarding MAPP, please find enclosed our Prevention Policy for your perusal.

Yours faithfully  
Per pro W H Keys Limited

[REDACTED]  
[REDACTED]  
Quality Assurance Manager



**W. H. KEYS LIMITED**

**Major Accident Prevention Policy**

**NOVEMBER 2004**

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## 1.0 : Introduction

We at W. H. Keys Limited are committed to achieving a high standard of safety performance and will therefore ensure that all necessary resources are made available in order to meet this goal.

An analysis of our activities, and the various processes and substances used on our site, has identified that we are classed as a 'lower-tier' site as defined in the Control of Major Accident Hazards Regulations 1999 ("COMAH"). We recognise that the nature of some of our activities may give rise to major accident hazards that may affect employees, contractors, visitors, members of the public, local residents, and the natural and build environment. We therefore have obligations to reduce the risks, which may affect these parties, to levels that are as low as is reasonably practicable.

In order to meet the obligations to our staff, customers, neighbours and other parties, the company has instigated and will maintain a **Safety Management System ("SMS")**, designed to ensure that we have a clearly documented set of procedures in place that will allow us to manage the activities on our site, in accordance with the provisions of the COMAH Regulations.

The aim in implementing this system is to reduce the risks associated with a major accident hazard to as low as is reasonably practicable.

.....  
[Redacted]  
[Redacted]  
Managing Director  
Date 30 November 2000

.....  
[Redacted]  
[Redacted]  
Works Chemist  
30 November 2004

### **The Safety Management System (“SMS”)**

The purpose of the SMS is to:

- Identify the roles and responsibilities of the persons involved in the management of the major accident hazards.
- Identify and provide for training needs – this may involve contractors as well as staff
- Identify and evaluate, through risk assessment, the likelihood and possible severity of major accident hazards which may arise on our site;
- Identify foreseeable eventualities, put into place appropriate measures to manage these potential events, and to carry out emergency plan reviews as required.
- Design and implement procedures and instructions that will ensure safe operation of the activities on the site;
- Monitors the performance of every level of management in respect of health and safety responsibilities;

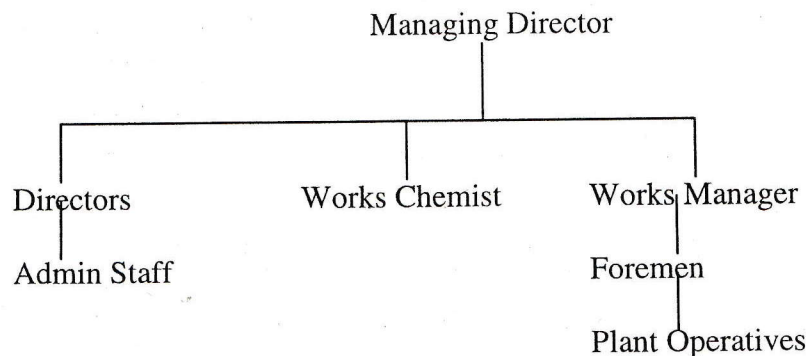
These criteria define our commitment to maintaining a safety management system.

The MAPP is based upon the following legal requirements:

- Control of Major Accident Hazards Regulations 1999
- The Health and Safety at Work etc Act 1974
- Control of Substances Hazardous to Health Regulations 2002

## ORGANISATION, PERSONNEL AND TRAINING

The management structure for the company is as detailed below:



Responsibility for setting and maintaining training schedules for employees lies with the Managing Director. Responsibility for contractors will be with the Works Manager. The organization structure is set to minimize the risk of a major accident and to minimize the consequences should one occur. All employees have been made aware of the potential for major accidents and procedures should an instance occur.

The responsibility for day to day activities are as:

### Managing Director (Safety Director)

To support the activities of Administration Staff and employees, to provide support in terms of training issues and to act as the final arbiter in the event of differences of opinion between departments. The Managing Director is also responsible for financial expenditure should it be required.

### Works Chemist

To support the activities of Administration Staff and Employees in the safe use of the raw materials used in the process of Cresol manufacture, also in training of safe methods of plant operation.

The Works Chemist is responsible for quality of product.

### **Works Manager**

To support the activities of Employees to ensure safe running of Cresol manufacture in accordance with the Company Health & Safety policies.

### **Production Operatives**

To operate production equipment under the direction of Works Manager/Foremen according to Company production procedures and in accordance with Company Health & Safety Policies.

All contractors employed on the site will be made aware of the potential of a major accident and their own responsibilities in relation to them. They will be instructed where relevant, in the procedures needed to ensure that the policy objectives are met. Where relevant the contractors will only be allowed to proceed with work subject to suitable permit to work having been authorized and issued by designated employee of the Company.

Where training requirements are identified resources will be made available to undertake the training needs.

All staff and employees have full and free access to this policy and information relating to it. The policy will be reviewed annually.

### **3.0 Identification and Evaluation of Major Hazards**

The objectives of our policy are to ensure that :

- The levels of risk are reduced to “as low as reasonably practicable” (ALARP)
- Major accident hazards arising from normal work are identified and their likelihood and potential severity are assessed;
- Where the potential for major accident arising from ‘abnormal’ operations can be foreseen they will also be assessed;
- The identification and evaluation of hazards covers all phases of our operations including storage, product transfer, product usage, and control of emissions to the environment;
- Hazards that may originate outside the site will also be addressed where they can be foreseen; this could be such things as arson, vandalism or Act of God;
- The SMS will be used to detail the major accident hazard through the use of risk assessments;
- Our management team will analyze the resulting risk assessments in order to identify areas of improvement, so that actions can be prioritised and scheduled as necessary.

The Risk Assessment Manual, which is part of the SMS, is used to detail and document the assessments that have been carried out.

#### **4.0 Operational Control**

Our policy is to ensure that :

- The risk of incidents with the potential for accidental damage to people or the environment is minimized by exercising control over all aspects of operations on the site.
- Operating procedures are designed and implemented
- Operating procedures and safe systems to work are periodically reviewed.

Operating procedures and safe systems to work will be developed with the co-operation of the persons involved in those tasks and who will be required to comply with them. The final decision on the methods to be implemented and followed will rest with the Managing Director.

The responsibilities and monitoring checklists within the Safety Management System will be used to document the individual responsibilities are being undertaken and documented.

#### **5.0 Management of Change**

Our policy is to:

- Identify and implement procedures that will allow us to implement changes to persons, processes and products should they be necessary.
- Where changes to any of the above criteria have been undertaken , reviews will be carried out to identify and address any issues that may have risen during the changes.

## 6.0 Planning for Emergencies

There are two foreseeable major accidents that could occur as a result of our activities :

- Fire
- A chemical spill or incident

Our policy is that:

- All operations are carried out in such a manner which serves to protect our employees, contractors and neighbors from injury or illness and which avoids damage to the environment, as far as reasonable practicable. This policy also extends to protection from major accident hazards.

- Small chemical spills will be dealt with in-house according to our safe system to work.

**NO ATTEMPT WILL BE MADE TO TACKLE IN-HOUSE, LARGE SPILLS OR FIRE THE EMERGENCY SERVICES WILL BE CALLED WITH OUT DELAY AND THE SITE EVACUATED**

- We will liaise and co-operate with the local fire brigade and other emergency services providing all requested information in order to draw up emergency plans as required.

The provisions of this MAPP will be reviewed periodically to ensure that it is still accurate and its effective.

## **7.0 Monitoring Performance**

Our Policy is to ensure:

- The procedures developed and implemented are monitored to ensure that they adhere to the requirements of the relevant legislation, in order to minimize the risk from major accident hazards
- Active monitoring will include inspection of plant, as well as checking compliance with documented procedures on training, safe working and documentation of process
- All accidents and incidents capable of leading to a major accident are reported and investigated, whether there was in fact an incident or not. The investigation should attempt to identify the immediate cause as well any other underlying causes, such as failure of the procedures to protect against the occurrence.
- Corrective and/or preventive action as determined by the outcome of such investigations will be recorded and set against a set deadline.

## **8.0 Audit and Review**

Our policy is

- The MAPP and SMS will be periodically be reviewed for effectiveness and suitability.
- Periodic internal checks will be carried out to ensure procedures are being followed
- All procedures will be reviewed and if necessary amended in the light of any incidents that may have the potential to escalate into a major incident.