

STA REPORT ON PLATFORM INSPECTION QUESTIONNAIRE



March 2016

STA report on Platform Inspection Questionnaire

BACKGROUND

The membership of the STA currently stands at approximately 160 companies and is made up from;

- Organisations that carry out emission monitoring ('Test Houses').
- Manufacturers and distributors who supply and service emission monitoring equipment
- Process operators
- Regulators

Virtually all personnel who are represented by the STA have a potential requirement to work at height on permanent and/or temporary platforms.

In the Work at Height regulations (2005) there is a requirement for platforms and access to go through a rigorous inspection regime, starting with a commissioning survey or base line inspection carried out by a competent person (e.g. a professional structural engineer) who will then outline the time table for inspections, namely a periodic inspection which may be carried out by a different competent person, and a before use check which may be carried out another competent person (e.g. by the process operator) to deem that the platform and access is acceptable for its intended use. There is also a requirement to take account of an exceptional occurrence. The STA has produced a guidance note (STA WAH001) on Inspection of Permanent Elevated Working Platforms, which provides full details.

During 2015, a test house contacted the Environment Agency, with concerns that platform inspections are not being carried out by all operators as required, and that there appears to be a significant lack of awareness as to what the legislation states and who it affects.

QUESTIONNAIRE

Following discussions with the Environment Agency, it was decided to produce a questionnaire, which could be completed anonymously, to find out how and when platform inspections are carried out. The questionnaire was developed with input from the Environment Agency and the STA's Health & Safety committee.

The questionnaire was sent in December 2015 to approximately 700 people in the STA membership database.

RESULTS

The following replies were received;

- Test Houses: 26 responses (this included 23 MCERTS-accredited organisations).
- Process operators: Responses were received from 19 out of 110 STA members (but some of these were for multiple sites).

Note: there are approximately 1800 sites in UK covered by Part A regulations.

Testing or servicing organisation questionnaire

Question		Yes	No
1	Do you request platform inspection certificates before visiting a site	23	3
2	If "Yes", at what stage do you initially request this		
	Quote acceptance	7	
	During production of the SSP	8	
	Before the emissions monitoring site work takes place	10	
	During the emissions monitoring site work	0	
	After the emissions monitoring site work has been completed	0	
	Other Comments On submission of documents to the customer (quotation renewals) We are in the process of making platform requests standard procedure, but at this time it is not required	2	
3	Will you continue to ask for a platform inspection certificates, if your request is ignored	22	3
4	What percentage of sites are able to provide platform inspection certificates		
	0 – 25%	10	
	25 – 50%	7	
	50 – 75%	4	
	75 – 100%	4	
5	If a platform inspection certificate is not provided what happens		
	The client is informed in advance that without it, the emissions monitoring cannot take place (and this is backed up by postponement of the work)	4	
	Upon arrival on site, the client is informed on the day that no testing can take place and the job is postponed	3	
	A visual inspection by the stack emissions monitoring team leader is performed, and, if the team leader deems it safe to proceed, the site work takes place	12	
	Other Comments Normally we would do 'c' above but re-iterate that a valid certificate would be required prior to an,	7	

	<p>Obtain confirmation from site contact that procedure is in place, and also visually check platform,</p> <p>Often large sites have complex inspection regimes and certificates for particular areas are hard to ,</p> <p>site conduct visual inspection that is discussed prior to work commencing,</p> <p>Sites we carry out testing on tend to have a labelling system and is part of their insurance liability,</p> <p>The site are required to fill in and sign a proforma platform inspection sheet provided by us.</p> <p>Usually meet and discuss with the process operator, generally an engineer then carries out the risk assessment.</p>	
6	Are your staff trained on pre-use platform inspections	
	Yes, we put all of our staff on an external training course	4
	Yes, we put all of our staff on an internal training course	3
	Yes, we put our team leaders on an external training course	1
	Yes, we put our team leaders on an internal training course	0
	No formal training is provided	16
	Other	2
	<p>Comments</p> <p>Informally covered as part of working at heights training course</p> <p>Staff are trained in items to look out for as part of harness training,</p>	

Process operator questionnaire

Question	Yes	No
1	23	2
2		
	1 year	11
	2 years	3
	5 years	5
	Never	0

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	Other please specify Comments Monthly. Annually and 4 Yearly. At periods recommended by competent inspector, Fixed platform inside windshield, They are supposed to be done every 12months but it is difficult to get the records for these inspections	5	
3	Do you carry out before use inspections	13	12
4	Are platform inspection records readily available	19	2
5	Do you have a system in place like the STA StackTag system	11	14
6	Does your platform inspection routine cover all aspects of your companies site insurance policies	13	1

The results are concerning because they suggest that many process operators are not making platform inspection records available and, consequently, emission monitoring organisations are frequently placed in the situation where they have to decline the work or inspect the platform themselves before proceeding (with or without the required competency to make the inspection).

The Environment Agency has reminded its Regulatory Officers not to ascend platforms if inspection records are not available or are out of date. They have also asked them to remind the operator that a valid inspection record is a requirement of the Working at Heights Regulations 2005.

The absence of an in date inspection record could be a breach of the Permit because it could mean that a Regulatory Officer would not be able to carry out an inspection of parts of the plant located at height (such as sample and CEMs locations).

Although, support from the Environment Agency is welcomed, it must be noted that regulation of health and safety legislation is not the responsibility of the Environment Agency.

SUGGESTED ACTIONS

- The STA to ask the Environment Agency to review the Operator Monitoring Assessment (OMA) guidance, so that the requirement to carry out platform inspections is included as a critical element of the assessment.
- The STA to approach the HSE to discuss the situation with regard to the enforcement of the Work at Height regulation requirements for platform inspections.
- Discuss with STA Equipment Suppliers to find out what their service engineers ask for when they go to sites.
- Discuss with the STA Process Operators what they see as the requirements to meet the legislation.