

04 TANK SOLUTIONS:

ITCO

An External Perspective on the Work of ITCO

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In the fourth in his series of external perspectives on the work of ITCO, Peter Mackay encourages ITCO Members to follow the Organisation's latest Guidance Document for working on top of a tank container – and to put pressure on loading sites to ensure correct safety procedures are in place.

Many years ago, when I was quite new to the business, I was talking to an investigator from the UK Health & Safety Executive (HSE). What did he look for, I wondered, when visiting a chemical plant? What are the major risks?

I was expecting him to say something about pressure vessels or pipework.

But, instead, he told me that the people at most risk of injury are those in the sales department, who have to drive to meetings. Car accidents were much more likely to cause death and serious injury than any process upset.

Similarly, HSE and equivalent bodies in other countries have concentrated on the numbers: while the potential consequences of a major accident may be very high, the likelihood of such an event happening is quite low. HSE has been just as concerned about the everyday injuries to site personnel – and to those visiting a site – resulting from slips, trips and falls. Getting those numbers down has been a high priority for enforcement agencies around the world.

In my work at HCB, especially when I am looking at incident reports, it is alarming to see how often those who are affected when something goes wrong at a chemical plant are not the company's own employees. Very often they are working for contractors on some cleaning or maintenance job, or delivering or loading goods on behalf of a third party.

These are often the people who get hurt in explosions but also by the everyday slips, trips and falls that might result in a scuffed knee or twisted ankle but sometimes can be much more serious. One of those accidents involves falling from a height – say, the height of the top of a tank container when it's on a chassis.

Trade associations like ITCO and the European Chemical Transport Association (ECTA) have been trying for years to remove the need for drivers to climb on top of the tank when they are at a loading or delivery site. There are many reasons why they shouldn't be up there - not least when they are dealing with hazardous chemicals, but also the provisions of broader safe working regulations and the duty of care that is imposed on site operators.

None of this is news; we know it too well by now. So what can be done?

No-one likes to turn work down and haulage companies might be more worried about losing business than they are about sending their drivers out knowing they will be asked to perform unsafe operations on the top of a tank.

But what is the (potential) cost of keeping that business? Any accident could be expensive and in some territories might involve corporate manslaughter charges if someone dies after falling from a tank. Or is it that smaller companies simply cannot afford the cost of corporate social responsibility?

If tank operators and their haulage partners are going to be able to put any pressure on loading sites to improve their safety procedures, they need some ammunition. That is one of the reasons for the publication of ITCO's new 'Guidance for Working on Top of a Tank Container', freely available to members on the ITCO website.

The information it contains could help operators remind recalcitrant facilities of their responsibilities and legal obligations, not least in terms of providing a safe working environment. And that means, if tank-top working is unavoidable, that there should be a fixed gantry with guard rails.

Armed with this information, it is now time for ITCO members to get out there and make a difference to driver safety.

- Peter Mackay

This is the fourth in a monthly series providing an external perspective on the work of ITCO. Members are invited to comment to the ITCO Secretariat (hicks@itco.org) or to the author via email on peter@meredithandco.info. Previous articles are available on the ITCO website.