Health & Safety: Platforms used in Emission Monitoring – a System for Recording Inspections

The Work at Height Regulations came into force on 6th April 2005. These regulations cover all industries. The Regulations cover elevated work platforms (including scaffolding and permanent platforms), fragile surfaces (e.g. roofs), and any ladders, gangways and stairways used to get to the elevated workplace.

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Author/Contact Details:
Source Testing Association
Unit 11, Theobald Business Centre
Knowl Piece, Wilbury Way
Hitchin, SG4 0TY
United Kingdom
Tel: +44 (0) 1462 457535
Email: stacktag@s-t-a.org
Web: www.s-t-a.org

This means that nearly all segments of industry and the power sector are affected:

- Monitoring organisations - when carrying out periodic stack emissions measurements from elevated workplaces;
- Instrument manufacturers and suppliers - when installing, servicing and calibrating Continuous Emission Monitoring Systems (CEMs);
- Regulators and UKAS staff - when carrying out audits for compliance checking purposes, MCERTS accreditation and OMA assessments; and
- Process operators - because the responsibility for ensuring the elevated workplace is safe and has been inspected falls largely on them.

Important features of the regulations

The regulations apply to:

- Work in any place (this includes any place above or below ground level) where, if measures required by these regulations were not taken, a person could fall a distance liable to cause personal injury;
- An employer in relation to work carried out by an employee of his; and by any other person under his control. Self-employed people are also covered.

The regulations require the employer to:

- Avoid carrying out work at height where reasonably practicable;
- Take appropriate measures to protect against fall, if work at height has to be carried out;
- Work equipment to be used as the safety measure(s) must be selected , giving collective protection measures priority over personal protection measures, in the order of the following hierarchy;
- Ensure the work at height is properly planned, appropriately supervised, and carried out in a way that is safe as is reasonably practicable. This includes selection of the most appropriate work equipment for the task in hand, taking into account the risks associated with its installation, use and dismantling including rescue requirements, emergencies and adverse weather conditions;
- Ensure competent persons carry out all activities (including organisation, planning, supervision and inspection).

The Regulations also contain specific provisions relating to falling objects and danger areas, inspection of work equipment and inspection of elevated workplaces.

Working on platforms at chimney stacks

The Regulations contain a number of Schedules describing the specific requirements for existing places of work (encompassing some permanent access to ducts and includes what STA term as permanent platforms at stacks), working platforms (includes temporary platforms created for the job in hand using scaffolding etc), guard rails, ladders, and inspection.

For all working platforms, the requirements focus on the need for the working platform to be of sufficient strength and rigidity, and for the supporting structure to be stable and of sufficient strength and rigidity and resting on a suitable surface. Other conditions cover dimensions of the platform and safety features (e.g. no gaps).

There are specific regulations requiring the employer to carry out inspections of work equipment and pre-use checks of places of work.

Working platforms and associated guard rails, barriers, toe-boards, ladders, etc., must be inspected at the following frequencies:

i. After assembly/ installation but before use;

ii. At suitable intervals where there has been exposure to conditions causing deterioration;

iii. At each time an exceptional circumstance has occurred which is liable to jeopardise its safety; and

within 7 days prior to use if the platform is one from which a person could fall more than 2 metres, is used for construction work, or is a mobile platform.

Furthermore, on each occasion before any elevated workplace is used, the employer must check the surface, and every parapet, permanent rail or other such fall protection measure.

This regulation requires that the employer's inspection is recorded and kept until the next inspection. Inspection is stated as meaning "such visual or more rigorous inspection by a competent person as to be appropriate for safety purposes. This includes any testing appropriate for those purposes". A specific schedule lists the particulars to be included in the report of inspection.

The next step

The STA have available the StackTAG system for elevated permanent platforms. Similar to the ScaffTag system for scaffolding the StackTAG can be fitted to the base of the platform and will have details of all surveys and inspections.

The STA StackTAG is designed for use with permanent platforms and is similar to the Scafttag system for scaffolding.

The system comprises a holder, which is to be attached at the base of the platform, and a plastic insert which gives details of previous surveys and inspections.

Using the stacktag system

The Work at Height Regulations 2005 stipulates that new and existing platforms must be subjected to a baseline survey. Platforms can then be subjected to periodic surveys and further inspections prior-to-use. Information concerning these surveys and inspections should be contained on the StackTAG as described below.

The StackTAG has been carefully designed to ensure that persons using a platform can clearly identify its survey/ inspection history. Inserts should not be cleaned and reused - entries should be made using a permanent marker pen. The StackTAG inserts can then be used to complement the written inspection records.

Baseline survey

For new platforms, the baseline survey is to be carried out after installation but before use. This is, in effect, a commissioning survey. In the case of an existing platform, a baseline survey should be carried out at the earliest opportunity by a suitably competent person (e.g. a Structural Engineer). He or she will report on the platform's current condition and whether it meets the appropriate specification (refer to STA guidance note WAH 001 for more information). The baseline survey should also state what acceptance criteria should be used for checking that the basic specification continues to be met during future surveys/inspections.

Periodic surveys

These are to be carried out at prescribed intervals. The frequency of periodic surveys should be risk-based, taking into account the current condition of the platform, deterioration risk-factors and other issues. The frequency of inspection shall be determined by a competent person (e.g. a Structural Engineer). Further guidance is given in STA guidance note WAH 001.

Next periodic survey due

This is the date when the next periodic survey is due to be undertaken.

Prior-to-use inspections

These are to be carried out within SEVEN days prior to use (if the platform is one from which a person could fall more than two metres).

This inspection has to be carried out by a competent person; however, this could be a member of a site's own staff who has received suitable and sufficient training from a Structural Engineer on the scope and conduct of prior-to-use inspections. Details of this training shall be formally documented.

The Source Testing Association

The Source Testing Association (STA) was established in 1995 the membership comprises representation from process operators, regulators, equipment suppliers and test laboratories. The STA is a non-profit making organisation.

The STA is committed to the advancement of the science and practice of emission monitoring and to develop and maintain a high quality of service to customers.

Its aims and objectives are to:

(i) Contribute to the development of industry standards, codes, safety procedures and operating principles;

(ii) Encourage the personal and professional development of practicing source testers and students;

(iii) Maintain a body of current sampling knowledge;

(iv) Assist in maintenance of a high level of ethical conduct;

(v) Seek co-operative endeavours with other professional organisations, institutions and regulatory bodies, nationally and internationally, that are engaged in source emissions testing.

The Associations headquarters are based in Hitchin, Hertfordshire with meeting rooms, library and administration offices.

The Association offers a package of benefits to its members which include:

- Technical advice relating to emission monitoring
- Conference and exhibition opportunities
- Seminars and training on a variety of related activities
- Representation on National, European and International standards organisations
- Training in relation to many aspects of emission monitoring
- Liaison with regulators, UK and International, many of whom are me