

When was the last time somebody checked your tackle?

THE MAINTENANCE, INSPECTION & TESTING OF GAS CONTROL EQUIPMENT

As many of you will recall, this requirement has been discussed in previous 'Updates' and it continues to be a matter that requires clarification. Not least, it seems, because of the attendant work &/or cost associated with setting up an equipment register and then undertaking the formal inspection and tests of gas regulators, flashback arrestors, etc.

The opening question that we tend to be asked in relation to formal inspection and testing is:

'Do we have to do this?' The short answer is 'Yes', for the following reasons:

In accordance with the Health & Safety at Work, etc. Act (1974), the employer has a duty of care to PROVIDE and MAINTAIN plant and safe systems of work. The caveat associated with this being insofar as it is reasonable and practicable - which begs the question 'What is reasonable and practicable?' This general duty was compounded by the [more] recent introduction of the Provision & Use of Work Equipment Regulations, with the Regulation 6 stipulating that all work equipment should be examined regularly. 'How and when should such checks of gas control equipment be carried out?' In order to answer this question, it is useful to consider that we have published guidance (in the form of BCGA Codes of Practice) and that a distinction should be drawn between portable and 'fixed' gas control equipment and 'systems' (pipework and associated equipment). The BCGA recommendation is that formal checking and testing of gas control equipment (regulators mounted on individual cylinders, etc.) should be carried out on an 'at least annual basis'. It was also pointed out that such checks should be carried out by an individual who is technically competent to do so.

'Fixed' gas distribution systems (gas cylinder manifolds and pipelines) are usually covered by The Pressure Systems Safety Regulations (2000). Hence, such systems, SHALL be properly designed, installed, tested and commissioned and, thereafter, that such systems will also be subject to [annual] inspection and testing and the scheduled replacement of key pressure control and containment equipment.

'What do I do now?'

Please do not despair. If we are required to use the guidance on the maintenance and inspection of gas control equipment in order to comply with the law (i.e. as it would appear to be entirely reasonable and practicable to do so), then a number of possible options are open to us:

1. To undertake the inspection and testing of [portable] gas control equipment ourselves. With this option we can assist by providing a training input. For many years now, we have provided courses that have enabled our clients to set up their own equipment registers, tag their regulators, inspect and test their gas control equipment. If you would like to pursue this possibility further then please get in touch and we can send you details on the course (half-day duration and run at your site).
2. Where time and staff numbers would be limiting factors in the successful implementation of an 'in-house' equipment checking programme, you may use an agency from outside of your organisation to do this for you. Not surprisingly, Gas Safety UK can offer this facility to its clients. We already provide an annual, on-site, regulator inspection and testing service to many organisations in both the public and private sectors. In fact, such has been the demand for an independent and cost-effective equipment checking facility, that we are delighted to announce that Les Sapsford has been seconded into the Gas Safety UK Division (from BJ Industries Ltd) to allow enhanced provision for our customers. As a consequence of this, we have also been able to 'flatten' the costs associated with on-site equipment checking and testing to: £450.00 + VAT per day on site. This charge is all inclusive; travel costs, expenses and the production of the final report and equipment register been 'built-in' to this day rate fee.
To find out more about getting Gas Safety UK onto your site in order to confirm the safety of your gas control equipment, just contact us to arrange an appointment for an initial site visit and assessment of your

3. Where fixed gas distribution systems are involved, we are usually required to look to an external contractor to carry out both the manifold and pipework installation AND the annual testing, remedial works, etc. The possible exception to this is the installation of small-bore instrument lines (e.g. 1/4" o.d. stainless tube and 'temporary' [plastic] tubing).

As many of you are aware, Gas Safety UK also offers gas cylinder manifold, gas line installation and testing as part of it's portfolio. Once again, we have designed a labour charge for such work on the same basis as for our on-site checking and testing of gas regulators.

Indeed, at the time of writing these notes we would like to recognise the efforts of Grant in getting himself all of the way up to Dingwall (& safely home again) to install a new argon system at one of our client's laboratories. As is often the case, this job was less straightforward than first appeared and had to be completed to a deadline in order to coincide with the installation and commissioning of new analytical equipment.

As above, if you would like to organise a site visit with an installation engineer for remedial works, maintenance and testing of gas lines then just give us a call.

There is, of course, a 'fourth way' through this. That, presumably, is to ignore whole thing in the hope that it will go away &/or that the likelihood of something going wrong is so low as to make action unnecessary.

The law demands that a suitable and sufficient assessment of risk be carried out and, where appropriate, that suitable control measures are introduced in order to minimise risks or, ideally, to eliminate risks to the employee, etc. Due to the hazards associated with use and handling of compressed gases and the attendant risks, we would suggest that control measures may be 'stacked' as follows:

A. ENSURE THAT PERSONNEL WHO USE, HANDLE & STORE COMPRESSED GASES ARE CORRECTLY TRAINED.

B. ALWAYS PROVIDE GAS CONTROL EQUIPMENT THAT IS OF AN APPROPRIATE STANDARD IN TERMS OF DESIGN AND CONSTRUCTION - if you aren't sure ask and we can assist you at the specification step.

C. MAKE SURE THAT GAS CONTROL EQUIPMENT IS PROPERLY CHECKED 'EACH TIME BEFORE USE' BY THE USER (see point A, above and the Gas Cylinder Safety Instruction sheet that we ship with our gas regulators for guidance).

D. IMPLEMENT A FORMAL SYSTEM FOR THE PERIODIC (at least annual) INSPECTION & TESTING OF BOTH PORTABLE AND FIXED GAS CONTROL & DISTRIBUTION EQUIPMENT.

E. RECOGNISE THE REQUIREMENT FOR THE SCHEDULED REPLACEMENT OF GAS CONTROL EQUIPMENT AND ALWAYS REMOVE EQUIPMENT FROM SERVICE THAT HAS BEEN DAMAGED, CONTAMINATED OR HAS BECOME DYSFUNCTIONAL.

AND FINALLY...

DO NOT ATTEMPT TO REPAIR OR MODIFY GAS CONTROL EQUIPMENT - tell us what you need and we'll get the equipment organised here in terms of inlet orientation, outlet fitting type, etc.

BY FOLLOWING THE STEPS (A - E, ABOVE) YOU CAN SAFELY SAY THAT YOU HAVE IMPLEMENTED A COMPLETE AND COHESIVE SYSTEM FOR THE SELECTION, CARE & MAINTENANCE OF YOUR GAS CONTROL EQUIPMENT.

Best regards, David Bayliss.

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