



اوتوريٽي ڪي بڻسائن ڪسلامتن
ڪصبيتن دان عالم سڪيتر
Safety, Health and Environment
National Authority

WORKPLACE SAFETY AND HEALTH NOTICE (WSHN)

TOPIC LOSS OF PRIMARY CONTAINMENT AT A CONTROL OF MAJOR ACCIDENT HAZARDS (COMAH) FIXED FACILITY				Reference Number 2026/WSHN/03
Approved by: Director of Regulatory Division	Endorsed by: Chief Executive Officer	Issue date: 21 July 2026	Expiry date: None	Revision No: 1.0

The Safety, Health and Environment National Authority (**SHENA**) reminds all Duty Holders of the importance of full compliance with the Workplace Safety and Health (Facilities) (Control of Major Accident Hazards) (**COMAH**) Regulations to ensure safe operations in their facilities. **Incident Summary:** Earlier this year, an incident occurred at a COMAH fixed facility involving an export storage tank. Oil was observed on the tank roof and discharging through the roof drainage system following titling of the tank's floating roof. Approximately 10,000 kg of oil was discharged from the tank.

Immediate response measures were undertaken to manage the drainage operations while ensuring the safety of the workers and the public. There were no injuries, casualties, or environmental damage; however, asset damage was reported.

Floating roof tanks depend on the continued integrity of their pontoons and roof structures to maintain buoyancy, stability and safe operation. Corrosion, structural deterioration, water ingress, ineffective temporary repairs, and inadequate inspection or maintenance can compromise the ability of these systems to function as intended.

Key Lessons Learnt: The incident underscores the importance of ensuring that roof drainage systems remain fully functional and capable of effectively removing accumulated rainwater. Drainage restrictions, design modifications, impairments, or reduced drainage capacity can lead to water accumulation on floating roofs, increasing roof loading and compromising roof stability.

In addition, modifications, temporary arrangements, and long-standing deviations affecting Safety Critical Elements (**SCEs**) may gradually erode the effectiveness of major accident

barriers if not periodically reviewed and managed through a robust Management of Change (MOC) process.

Required Actions: All COMAH facilities are reminded to **ensure that Safety Critical Equipment (SCE)** is maintained in a fit-for-service condition throughout its operational life, particularly at ageing facilities and during periods of severe weather.

Sufficient measures should be implemented to reduce residual risks to As Low As Reasonably Practicable (ALARP), including but not limited to:

a. **Maintaining floating roof integrity**

Periodically inspecting and maintaining pontoons, roof structures, seals, and associated components to prevent degradation, corrosion, water ingress, and loss of buoyancy. This include routinely monitoring of roof level, roof leg position, seal condition, and buoyancy indicators to detect abnormal roof movement, excessive tilt, uneven flotation, or loss of stability at an early stage.

b. **Ensuring drainage systems remain effective**

Verifying that drainage systems are free from restrictions, impairments, and unauthorised modifications, and are capable of managing anticipated rainfall conditions. This should be done through regular inspections and maintenance to ensure it remains fit for purpose and prevent excessive loading, roof submergence or loss of buoyancy.

c. **Managing ageing assets and integrity degradation**

Implementing risk-based inspection programmes, corrosion management, and fitness-for-service assessments to identify, assess, and address deterioration before major accident barriers are compromised.

d. **Managing modifications, temporary repairs and deviations**

Ensuring that degraded, impaired, or unavailable SCE are formally identified, risk assessed, tracked, and restored within defined timeframes, with appropriate compensatory measures implemented where necessary.

e. **Building workforce competency and situational awareness**

Ensuring personnel responsible for tank operations, inspection, and maintenance are adequately trained and competent to recognise operating envelope exceedances, abnormal roof behaviour, degradation of SCEs, and early indicators of loss of containment or buoyancy.

f. **Operation within design and operating limits**

Ensuring tank filling, product withdrawal, and other operational activities are conducted within established design and operating limits, including product level restrictions, roof travel limits, and allowable loading conditions.

All Duty Holders are reminded of their obligations under Regulation 20 of the Workplace Safety and Health (Facilities) (Control of Major Accident Hazards) Regulations to ensure that all operations and activities are conducted in accordance with the procedures, measures, and arrangements described in their approved Safety Case, including maintaining the integrity and effectiveness of Safety Critical Equipment and associated systems.

For further clarification, please submit inquiries via “General Enquiries” on the SHENA website (www.shena.gov.bn), or contact the SHENA office at + **673 238 2000** during office hours.

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