



तेल उद्योग सुरक्षा निदेशालय
OIL INDUSTRY SAFETY DIRECTORATE

भारत सरकार, पेट्रोलियम और प्राकृतिक गैस मंत्रालय
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OISD/ENGG/GEN/21

Date: 21.04.2020

Sub: OISD Views/Comments on the amendments proposed in the "Petroleum and Natural Gas Regulatory Board (Codes of Practices for Emergency Response and Disaster Management Plan (ERDMP)) Regulations, 2010.

This has reference to PNGRB letter No PNGRB/Tech/I9-ERDMP/ (1)/129 dated 27th February 2020 seeking views/comments from the stake holders on the amendments proposed in the subject Regulations.

2 The amendments proposed in the document, upon review at our end, are largely in order and would prove useful for further enhancing the level of emergency preparedness of the Industry at large.

3 In this regard, OISD would like to make one major observation about an extant provision in the document which mandates approval of the ERDMP document at the Board of Director's Level of any given entity. The ERDMP Regulations document, through its initial notification in 2010, had a proviso whereby approval of the ERDMP document of any entity has to be approved at Board of Director's Level of the entity prior to its submission to PNGRB. Further, as per current amendment by PNGRB (under serial number 84 of the tabular form amendments), it is proposed that any amendment to the ERDMP document should also be approved by the authority which has approved the original ERDMP document i.e. entity's Board of Directors; **which in our opinion i.e. approval of the document at Board Level, needs to be reviewed.**

4 It may be mentioned that during OISD Safety Audits, particularly that of Marketing Installations, certain observations with regard to quality of ERDMP documents in such installations have been made. Basis such observations, OISD, in some cases, has made recommendation to effect suitable amendments in extant ERDMPs of such entities.

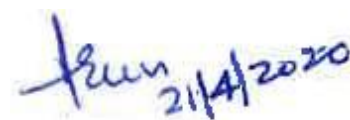
In this context, it would be necessary to mention that as per the proposed amendment in the PNGRB ERDMP, all such amendments shall have to go through the process of approval at Board of Director's Level; **a provision in our view is not desirable and needs a relook.** Some of such observations whereby amendments to extant ERDMP document of the entity have been recommended by OISD are placed at **Annexure-1** for ready reference.

5 Further, OISD feels that ERDMP document can be approved by any competent authority of the entity concerned at an appropriate level.as there exists adequate provision of such Authorities' below the Board of Director's Level in all the companies; **and such competent authorities are capable and competent enough for review and approval of the ERDMP.**

In view of foregoing, it is requested that PNGRB may review the extant requirement of approval of the ERDMP document at the Board of Director's level; and move a suitable amendment in this regard.

Thanking you,

Sincerely yours,



(Arun Mittal)
Executive Director

Encl: a/a

**The Secretary,
Petroleum & Natural Gas Regulatory Board
1st floor, World Trade Center, Babar Road
New Delhi-110001**

CC: Joint Secretary (Refinery), MoP&NG, New Delhi

Annexure-1**Some of the observations about Gaps in entity's ERDMP made during OISD Safety Audits of Marketing Installations**

S. No.	Audit Date	Entity	Point	Point made by Audit Team	Recommendations Given
1.	Jan. 13-15 2020	HPCL Jammu LPG BP	Whether well-defined ERDMP (on site) is available for the location based on above study? Whether the same is vetted by PNGRB accredited agency and submitted to the Inspector of Factory and PNGRB after board approval?	EPDMP is certified by M/s TQ Services vide Certification No TQ/EMP/742 dated 20.09.2019 which is valid up to 19.09.2024. Following are the observations noted in ERDMP document. (a) page no 46 of 154, point no 12.3 - list of Mutual Aid Members do not match with that of HPCL Jammu LPG Plant. (b) page no 48 of 154 point no 13(a)(i) mentions Sphere 1, 2 & 3, Railway Gantry 1& 2 whereas the facilities are not available in Plant. (c) page no 49 of 154 point no 13 (c) shift timings given in manpower data is not in line with that followed in Plant, (d) page no 71 of 154 point no 14.2.4.1 Fire Safety Team Structure & Function given in ERDMP do not match with present manpower of Plant.	There is lack of application on part of the Consultant who has prepared the report and also Plant personnel who should have reviewed the same before accepting the report. ERDMP to be corrected as per the existing facilities, manpower available etc. and get the same approved after required amendments.
2.	Feb'20 - 27 to 29	IOCL Cochin POL Terminal		The current certified ERDMP document shows TLF Gantry with 18 bays whereas location is operating 24 bays for filling TTs.	Location shall amend the ERDMP document incorporating 'as-built' facilities and latest QRA study.
3.	Feb'20 - 20 to 22	IOCL, Wadala		ERDMP does not cover few credible fire scenarios like fire at TT Parking area, in Receipt pipeline exchange pit present inside the Terminal.	ERDMP must cover all credible fire scenarios in all hazardous area inside Terminal.