

With reference to the attached document, it is proposed by PNGRB to include “Construction & Project” stage in all section of ERDMP document. This would require revision of existing internal ERDMP documents and Project Contracts including introduction of new aspects like HAZID of construction activities, mock drill during project phase, emergency response of construction related risk, etc. Also few definition has been revised to include Project phase related risk and new formats introduced.

With reference to the new revision proposed in few sections of ERDMP regulation, please find below the comments;

CPE – Annexure-2 ERP Project:

1. This section needs to be reviewed by Project department (CNG, Steel, MDPE)
2. The scope of ERDMP revised from just Operation to encompass “Project and Construction” phase also. This would result in revision of all existing / approved internal ERDMP document to cover phases / aspects like;
 - Statutory Requirements - No changes as existing list in ERDMP is comprehensive
 - Pre-Emergency Planning - HAZID to be carried out covering all associated risk of construction activities (e.g. excavation, welding, WAH, RT, hydro, etc.) and HSE Aspect-impact register would have to be prepared.
 - Emergency Mitigation Measures - No change as it is presently also done for existing contracts / projects
 - Emergency Preparedness Measures - It is proposed to include / conduct mock-drills of Project Contracts and develop emergency response for Construction activity related risk for both on-site & off-site
 - Emergency Organization and Responsibilities - No change as Project is part of ERT
 - Resources for Controlling Emergency - Though most of the aspects are currently in place; however, it is proposed to have Mutual aid with similar construction/Hydrocarbon industries for handling critical emergencies including hospitals, fire fighting agencies, police, etc. through formal letter / agreements.
 - Emergency Recovery Procedure - No change as existing practises covers it.

CPE – Annexure-3 Mock Drill:

1. Mock Drill reporting (recording) format introduced. Would require review of existing format to cover all aspects mentioned

CPE – Annexure-A:

1. Change in Definition of “Disaster”, “Incident Record register”, “Leak”, Mutual Aid Association” and “Off-Site Emergency”; streamlined to enhance understanding and coverage.

CPE – Annexure-I:

1. Format of MSDS introduced. Would require review of existing format to cover all aspects mentioned