CIRCULAR NO. 06/2020

In view of the prevailing situation of COVID-19 across the world and in Kerala and based on the Lock Down declared by the Government, certain directives were already given to all factories coming under the purview of Indian Factories Act, 1948 and The Kerala Factories Rules, 1957. Now considering the situation of toxic gas release from a closed factory in Andhra Pradesh, the following points shall be taken care of while restarting of chemical plants/process plants or as a general start up precautions for all factories after prolonged closure, especially in the present lock down scenario.

1. All factory buildings shall be properly ventilated before admitting any personnel. This should be checked and verified by a designated Safety Officer or in his absence by competent senior personnel of the factory.

2. Ensure that operators involved in the startup procedure are supervised and supported by experienced technically trained personnel during startup and they are sufficiently trained on the control system that they will be operating.

3. Proper PPE shall be ensured for workers engaged in the initial cleaning and start up process to address leakage/presence of toxic gases.

4. Identify all potential hazards due to lock down and based on that Safe Operating Procedure (SOP) shall be prepared and shall be strictly followed.

5. All closed storage tanks - floating roof, fixed roof and underground storage tanks shall be checked for toxic gases and accumulated pressure due to formation of gases before hooking up to process lines.

6. Proper working of all safety relevant systems including Pressure gauges, Level gauges, Safety valves, Pressure relief valve etc. of all Underground storage tanks, Overhead storage tanks, Reaction vessels, and Pipelines shall be ensured and Calibration if required shall be conducted before startup operations.
7. Process pipe lines shall be safely flushed for clearing toxic fumes and vapours to be neutralized, (which may have accumulated) and all lines shall be leak tested before taking into use.

8. Ensure proper working of all detection systems including sensors for toxic gases and flammable gases.

9. All type of work permit systems shall be strictly followed.

10. Ensure electrical cables and electrical equipments are in good working condition and free of defects. Also make sure the functioning of all circuit breakers like ELCB, MCB etc.

11. Do not bypass critical safety devices while trouble shooting during start up

12. All movable machinery/equipment must be de-energised or disengaged and locked out during cleaning, servicing, adjusting or setting up operations.

13. All lifting machineries and lifting tackles shall be checked before operation.

14. Ensure proper working of all emergency systems before starting up of plant.

15. Ensure adherence to all relevant start up procedure and Work instructions during startup.

16. Wherever possible emergency services shall be kept on standby or Onsite emergency plan to be activated for meeting unforeseen situation, during cleaning/startup of plant.

The above instructions are not exhaustive in nature; any additional precautions as may be necessary should be adopted by the factory management for safe startup of the factories after prolonged shutdown. All factory management are directed to submit a detailed start up plan to the concerned inspector for verification prior to commencement of operation of the plant.

DIRECTOR OF FACTORIES AND BOILERS

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