

Our Services:

Manufacturing Systems

Production Scheduling

Business Process
Modelling

Event Management

Our Clients:

- ABB
- AEA Technology
- British Sugar
- Arthur D Little
- Bridon
- British Paper & Board
- Camaxys
- Cambridge Consultants
- Carbon Trust
- DEFRA
- DICIDA
- DTI
- Eli Lilly
- GlaxoSmithKline
- Grotech Production
- Hickson
- Humber Chemical Focus
- ICI
- Impress/HCCTA
- J R Crompton
- Lakeland Laboratories
- Luxus
- Manro
- Norsk Hydro
- PICME
- PSE
- Roche
- Rotork
- Scott Bader
- Servelec
- Severn Trent Water
- SIRA
- Spiritus Consulting
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- Tensachem
- University of Newcastle
- University of Sheffield
- University of Strathclyde
- UMIST
- Yorkshire Forward

Dynamic COMAH Classification System

Do you handle hazardous materials on site? Have you identified whether the site needs to be classified under the COMAH (Control of Major Accident Hazards) regulations? Are you aware of the changes due to come into force this summer?

Do you have a dynamic stock situation, in which the quantities and identities of hazardous materials change rapidly? Can you manage your inventory to ensure that you do not exceed the levels permitted for your COMAH category?

If you simply want advice on whether you should consider COMAH registration, or if you need a management tool to maintain a record of your changing COMAH circumstances over time, we can assist you.

"We have a complex stock situation with rapidly changing quantities of agrochemicals which are often toxic or dangerous to the environment. We need to know at any time what our COMAH position is, and to prove it if necessary. We also need to assess the impact of accepting a future order on our situation. The MS² system interfaces to our existing stock systems, provides a validated and rapid answer to the COMAH question, can be used easily for "what ifs?" and is appropriate for SMEs. It takes more than a simple spreadsheet to answer the COMAH question."

Martin Usher
Managing Director, Grotech Production Ltd



"The MS² system has given the management an easy to use tool, that helps us to manage our inventory and keep below the 2005 COMAH thresholds."

Philip Clarke
Managing Director,
Lakeland Laboratories Ltd

Speciality chemical manufacturers, blenders and packers face a particular problem in COMAH management. Quantities of hazardous materials can change very rapidly; it can be difficult to keep track of the current COMAH "score", to maintain an auditable archive of past hazards and to calculate the impact of future business on COMAH rating.

AJM Consulting has developed, within its MS² Manufacturing Support System, a tool to help management to analyse and record COMAH-contributing hazards across the site. With support from DTI's e4C programme, the technology has been packaged to make it cost-effective and practical for the SMEs (small and medium enterprises) that make up so much of the UK's chemical-related industry sector. The technology and benefits are now proven in companies like Grotech Production (contract packaging) and Lakeland Laboratories (Speciality surfactants).

continued overleaf...

COMAH

Legislative compliance is probably the most important issue facing the UK's chemical industries today. The COMAH (Control of Major Accident Hazards) regulations require that sites which hold hazardous materials implement procedures which can be complex and costly. This may be avoided by holding a quantity which is less than required for registration under the act – and for many reasons it is good practice to hold low stocks anyway. In practice the calculation involved in determining the COMAH situation for a typical speciality chemical site is quite complex and beyond the scope of spreadsheets.

Whether or not a site needs to register as a COMAH site is dependent on the quantities and hazard ratings of all materials held on site. For example, with Grotech's complex materials storage situation the system needs to include over 2,000 materials in its calculation.

Validation

With a calculation of this complexity it is necessary to ensure that every item of stock has been included in the calculation - otherwise an erroneously low hazard rating would be the result. The MS2 system ensures that all necessary data are present, such as the quantity of material, the type of quantity units in which stock is expressed, the specific gravity if needed, and so on. For each stock entry, the system also checks that the material has been allocated to a COMAH classification. Any entries with missing data are clearly indicated as errors.

Category	Substance	Aggregation 1		Aggregation 2		Aggregation 3	
		Low Tier	High Tier	Low Tier	High Tier	Low Tier	High Tier
Generic Category	Dangerous to the environment (R50)			0.0100	0.0040		
Generic Category	Dangerous to the environment (R51)			0.0029	0.0007		
Generic Category	Toxic			0.4500	0.1125		
Generic Category	Very Toxic			0.3400	0.0850		
Aggregation Totals		0.0000	0.0000	0.8029	0.2022	0.0000	0.0000

Low Tier Value: 0.8029 High Tier Value: 0.2022

BELOW ALL COMAH THRESHOLDS

Example data—does not reflect any actual situation

Stock Hazard Identification

One of the principal benefits of the system is the ability to produce an accurate stock hazard report showing the quantities and principal hazards of all materials on site - an obvious benefit when implementing plans for emergency management. Another important feature is its ability to hold electronic versions of material safety data sheets, further enabling it to assist in the event of a site emergency.

Archiving and Audit Capability

The ability to retrieve historic data relating to COMAH is essential. MS² provides historic trending with comprehensive “drill down” to all components of the calculation, showing when stock readings were taken, what hazard categories were allocated to each stock item and so on. Any potential calculation errors caused by missing data is also shown, providing a comprehensive audit trail.



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