

Petroleum and Petrochemical Bulletin

Access to External Floating Roofs

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Introduction

IFIA member companies are, on occasion, requested by either principals or terminal operators to access external floating roofs on shore tanks, either to draw samples or to perform multi point gauging.

Rules relating to external floating roof access vary considerably from location to location, as do the safety controls put in place. The usual factor governing access is the roof position within the tank. However, limits vary from a maximum of a few feet (one course of plates) below the tank lip, to the tank being at 50% capacity. These differences not only cause confusion for the inspectors in the field but, more importantly, can expose inspectors to unacceptable risk.

Inspectors are currently accessing external floating roofs using a four-gas monitor with an Emergency Life-Saving Apparatus (ELSA) or by using a Self-Contained Breathing Apparatus (SCBA). However, in many situations additional controls are required to ensure that potential risks are addressed.

Access to external floating roofs is not consistently addressed within the normally recognized international petroleum standards used by the inspection industry. Therefore, IFIA member companies recommend that the following procedure is followed.

Recommended procedure

The risks regarding access to external floating roofs must be controlled via a permit to work system or an equivalent protocol even if regulations suggest that a confined space situation does not exist.

The permit to work system must be managed by the terminal and must as a minimum include:

- Risk Assessment for the activity, conducted by competent individuals in association with the inspection personnel concerned
- Method for verifying the atmosphere in the space immediately above the roof.
- Method of communication from the personnel on the tank to the terminal during the operation
- Method of escape / recovery in the event of an incident
- A minimum of two persons to perform the activity

It should be noted that, in addition to the hazards associated with confined space entry (if these conditions exist) the risk assessment must consider the structure, stability, and condition of the floating roof as these are typically not designed to be load bearing.

Revisions/Reaffirmations

Rev. 0 October 2016
Rev. 1 April 2018

In the event that the terminal facility does not have, or refuses to implement, a permit to work system with the correct controls, the IFIA member company will enforce their stop work authority (SWA). The SWA will be revoked if, and as soon as, conditions and controls identified in a risk assessment are fully met. (See Bulletin 16-01 regarding stop work authority)

IFIA Petroleum and Petrochemical Committee

Head office: Rue de Commerce 20-22 B-1000 Brussels
London office: 1 Paternoster Square, London EC4M 7DX

secretariat@ifia-federation.org
www.ifia-federation.org