

# HEALTH AND SAFETY – FROM PAPERWORK TO PRACTICE

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## ABSTRACT

Safety professionals have a range of tools available to them to carry out safety studies. Many of these tools are aimed at the design phase, where safety is a key consideration, and mitigation can most readily implemented at minimum cost. Safety studies during the design phase typically consider the whole life cycle of the asset from construction through to operation, maintenance, and decommissioning / deconstruction of the asset.

This paper describes the challenges of translating the health and safety outcomes of paper-based studies into practical actions that must be carried out during construction, operation and maintenance. The paper draws on a case study from the Christchurch Wastewater Treatment Plant (CWTP), the trickling filters, which shows the value and necessity of undertaking hazard analysis and risk assessment studies throughout the life of a project.

There are various paper based studies that can be used at different stages throughout a project lifecycle to provide information on health and safety. During the design phase HAZOP and Safety in Design are effective methodologies. During construction Permit to Work paperwork combined with Job Safety Task Analysis methodology provides a platform for identifying and managing health and safety risk.

## KEYWORDS (ARIAL, 11)

**Health and Safety, Hazard, Risk, Operation and Maintenance, Job Safety Task Analysis, JSTA, Safety in Design, SiD**

## 1 INTRODUCTION (ARIAL, 14)

Safety professionals have a range of tools available to them to carry out safety studies. Many of these tools are aimed at the design phase, where safety is a key consideration, and mitigation can most readily implemented at minimum cost. Safety studies during the design phase typically consider the whole life cycle of the asset from construction through to operation, maintenance, and decommissioning / deconstruction.

Commonly used methodologies for design phase safety studies include Hazard Identification (HAZID), Safety in Design (SiD), Hazard and Operability Study (HAZOP), and Risk Assessment, through to more formal Management of Change (MoC) and Layer of Protection Analysis (LoPA). All of these methodologies are paper-based and are undertaken in workshops, interviews or desk-top assessments. The studies typically involve identifying the hazards and assessing the associated risks. Controls are used to reduce the risk score to an acceptable value. The workhorse of health and safety during construction, as well as during operation and maintenance, is the Job Safety Task Analysis (JSTA). This methodology draws together the hazards, mitigation and associated risks from the design phase studies and applies them on a task by task basis to the activities that need to be carried out. Often new hazards are identified, associated with the actions required to carrying out individual tasks. The JSTA usually forms the basis of permit-to-work paperwork. When events do occur, these can be investigated using methodologies such as the Incident Cause Analysis Method (ICAM).

## 2 TRICKLING FILTER EARTHQUAKE REPAIRS AND MAINTENANCE – A CASE STUDY

### 2.1 BACKGROUND

#### 2.1.1 PROCESS DESCRIPTION

The CWTP receives untreated wastewater and removes or reduces various contaminants through a series of processing steps, see Figure 1.

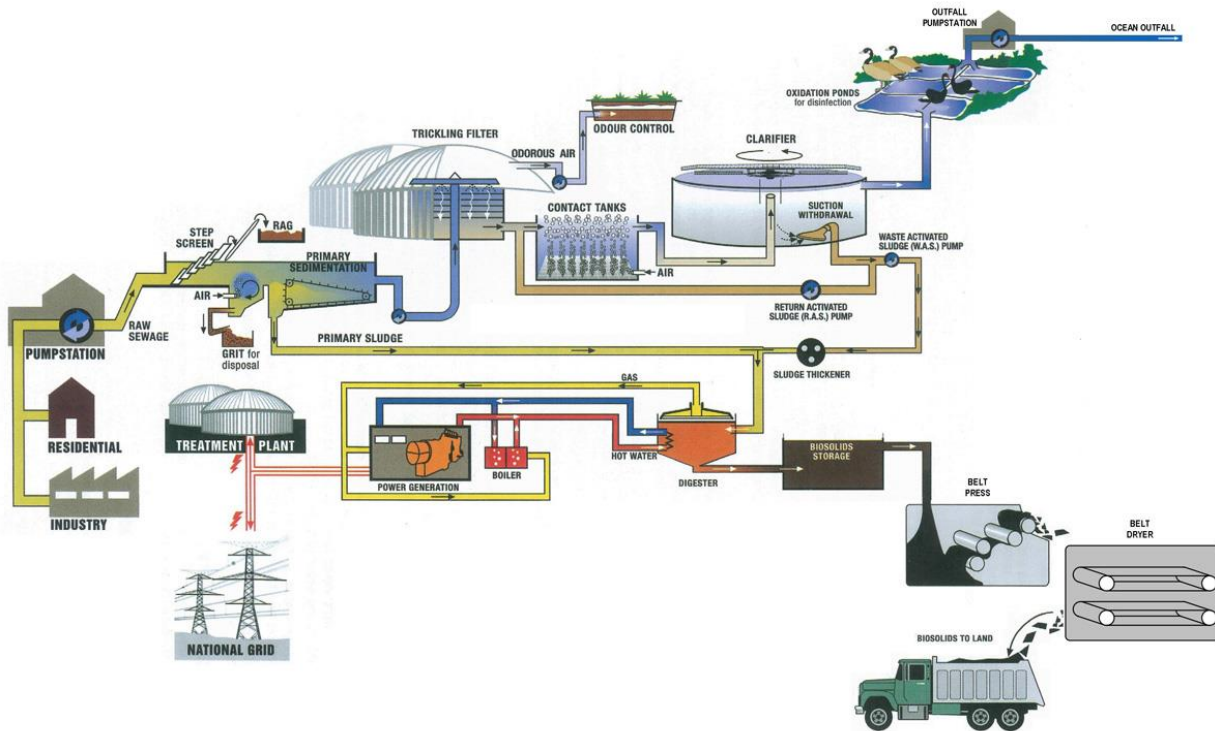


Figure 1: CWTP Process Flow Diagram Showing Key Unit Processes

Initially the wastewater passes through a 3mm gap screen to remove large items. Heavy solids such as sand and grit are then removed in the grit traps. The wastewater then flows into the primary sedimentation tanks, where lighter, organic solids settle more slowly. These solids are removed and are pumped to the solids processing train, where they are digested and biogas produced.

The overflow (primary effluent) from the primary sedimentation tanks is pumped to two trickling filters operating in parallel. These trickling filters are large fixed bed reactors, filled with structured, PVC packing. The primary effluent is sprayed over the top of the packing and trickles down through the packing to the bottom of the trickling filter where it is collected. Microorganisms grow in a biofilm layer on the surface of the packing material which sloughs off periodically. The biomass feeds on the dissolved organic compounds present in the primary effluent.

The treated primary effluent and sloughed biomass pass to the secondary contact tanks. Fine air bubbles encourage further biomass growth and also facilitate biomass agglomeration. These agglomerated biomass solids then settle in the next process, the secondary clarifiers. A portion of the solids from the clarifiers are recycled to the contact tanks (creating a short retention activated sludge process). Waste sludge is pumped to the solids processing train (with the primary settled solids). The clarifier overflow flows to the oxidation ponds for final polishing and disinfection via sunlight, prior to discharge via a 3km long ocean outfall.

## 2.2 BACKGROUND

The two trickling filters at the CWTP were constructed in 1976 and 1977. They are over 20m diameter and 10m high and were originally open topped vessels (see figure 2). Since this time both trickling filters have undergone several upgrades, including the construction of a top cover to enclose the vessels and protect the packing material for UV damage. The original distribution arms have been replaced and the central tower upgraded.

The trickling filters are in constant operation and the adverse atmosphere inside the trickling filters limits access for maintenance and repair activities. However, the trickling filters are a critical part of the treatment process at the CWTP, where the secondary treatment takes place. As a result the trickling filters are typically only taken off line, one at a time, once a decade. Furthermore, both trickling filters were damaged during the Christchurch earthquakes of 2010 and 2011. The nature of this damage meant that the trickling filters needed to be taken off line for repairs to be undertaken.

To minimise the disruption to CWTP operations, a combined programme was developed for maintenance and earthquake repairs. General maintenance and repair was undertaken by both CWTP operations staff and earthquake repairs were undertaken by a contractor.



*Figure 2: CWTP Trickling Filters*

## 2.3 JOB SAFETY TASK ANALYSIS

### 2.3.1 JSTA

A JSTA was used to identify hazards to people and plant/equipment for the construction phase activities. A JSTA is a methodology for systematically assessing the individual tasks involved in a project or job. For each task the potential hazards were identified. The consequence and likelihood for each hazard was considered and from this the risk was assessed. Mitigation efforts then focused on the highest risks. Risks to not only people, but also the plant/equipment were considered during the preparation of the JSTA. It was important to consider both the removal and reinstallation of equipment as separate tasks. This resulted in a large number of hazards being identified in the JSTA. Most were assessed as low or very low risk.

A great many individual tasks were identified to carry out the trickling filter repairs and maintenance, which resulted in a large number of hazards being identified in the JSTA. Most were assessed as low or very low risk. The hazards assessed to have medium to high risk to people and plant/equipment are summarised in tables 1 and 2 respectively.

### 2.3.2 PTW

The JSTA is an important part of the PtW process. At CWTP the PtW is the key pathway for implementing the paperwork during construction and are required prior to commencing any work. The PtW system applies to contractors as well as CWTP Operations for undertaking construction, maintenance and repairs.

*Table 1: Medium to High Risk Hazards to Plant/Equipment*

<b><i>Hazards to Plant/Equipment</i></b>	<b><i>Consequence</i></b>	<b><i>Likelihood *</i></b>
<b>PVC Media Damage – standing on media</b>	PVC media is damaged as a result of working on media surface	Unlikely as plywood is placed over the media to protect it.
<b>PVC Media Damage – tool dropped from above</b>	PVC media is damaged by falling tools	Possible if tools are dropped
<b>Crane – equipment placed incorrectly</b>	Equipment placed incorrectly resulting damage to the trickling filter of the media	Possible. All lifts to be planned and spotter is in constant communication with crane operator
*In this summary the likelihood presented is following the implementation of controls to eliminate, mitigate, and/or manage the hazard		

Table 2: Medium to High Risk Hazards to People

<b>Hazards to People</b>	<b>Consequence</b>	<b>Likelihood *</b>
<b>Fall from height – slip while working on the trickling filter roof</b>	Fall from the roof to the floor (over 10 metres) resulting in serious injury or death	Unlikely as fall protection was mandatory (e.g. fall arrestors, scaffolding, etc)
<b>Spain or strain - injury lifting or pulling heavy roof panels</b>	Injury to back or muscles	Unlikely as roof panels designed to be removed. Crane on standby to assist if panels are stuck shut and difficult to open
<b>Falling tools – tool dropped from above</b>	People working below are injured from falling tools	Unlikely as access to upper level is restricted when people are working below
<b>Spain or strain - injury lifting heavy material/equipment</b>	Injury to back or muscles	Unlikely as crane available for heavy lifts and roof panels removed to provide crane access
<b>Falls – falling from scaffold or staircase</b>	Injury such as broken bones	Unlikely as scaffold and staircase designed to minimise falls
<b>Electrocution – temporary lighting installed</b>	Electrocution due to faulty wiring or installation	Unlikely as all electrical wiring is checked and tagged as suitable prior to use
<b>Fall from height - fall into central riser pipe</b>	Fall into central riser pipe resulting in serious injury or death	Unlikely as mesh cover to be installed over riser pipe
<b>Crane injury – hit by crane</b>	Hit by crane as crane operator cannot see inside trickling filter	Unlikely as spotter to be in constant communication with crane operator and all personnel outside trickling filter during lifts
<b>Crushing injury – heavy equipment incorrectly placed</b>	Person crushed by heavy equipment	Possible. Spotter to be in constant communication with crane operator
<b>Suffocation – trickling filter subfloor is a confined space</b>	Low oxygen levels in the subfloor space could lead to suffocation	Use confined space protocols including testing for oxygen levels, constant radio contact, recovery plan, ventilation
<b>Suffocation – degrading biomass inside trickling filter</b>	Low oxygen levels inside the trickling filter could lead to suffocation	Testing for oxygen levels, recovery plan, ventilation
<b>Infection – from contact with biomass or bites from flies/insects</b>	Skin infection, meningitis, leading to sickness or death	Immunisations, personal hygiene such as hand washing and showering
<b>Illness – from contact with biomass</b>	Ill health, vomiting, diarrhea	Personal hygiene such as hand washing and showering. Isolation of trickling filter tagged and tested.
<b>Crushing injury – trench collapse</b>	Trenches down to deep underground pipes could collapse, leading to injury or death	Unlikely as sheet piling used in all deep trenches
<b>*In this summary the likelihood presented is following the implementation of controls to eliminate, mitigate, and/or manage the hazard</b>		

## 2.4 SAFETY IN DESIGN

JSTA methodologies are not effective for identifying hazards to the environment. SiD methodology was used to identify and assess the hazards posed to the environment. A SiD workshop was undertaken during the design of the earthquake repair works. The workshop involved both the design team and the operations team. The SiD study included a structured workshop facilitated by an experienced and independent facilitator. A set of standard guidewords were used to test the design with respect to safety. The four phases of asset life were considered, construction, commissioning, operation and decommissioning. Two main hazards to the environment were identified:

- Malodorous discharges to air
- Insufficient wastewater treatment

These were linked, as inadequate wastewater treatment could lead to offensively odorous discharges being released. Each hazard had several possible causes, as shown in Table 3.

*Table 3: Medium to High Risk Hazards to Environment*

<i>Hazards to Environment</i>	<i>Consequence</i>	<i>Likelihood *</i>
<b>Malodorous discharges to air – due to incorrectly taking trickling filters off line</b>	Odour complaints from local residents in breach of resource consents resulting in fines.	Possible – this occurred last time the trickling filters were taken off line
<b>Malodorous discharges to air – due to secondary contact tank performing poorly</b>	Odour complaints from local residents in breach of resource consents resulting in fines.	Possible – all secondary contact tanks will need to be in service
<b>Malodorous discharges to air – due to oxidation ponds becoming overloaded</b>	Odour complaints from local residents in breach of resource consents resulting in fines.	Possible – ponds have been overloaded in the past
<b>Inadequate wastewater treatment –due to secondary contact tank performing poorly</b>	Discharges exceeding resource consent conditions resulting in fines	Possible
<b>Inadequate wastewater treatment –due to oxidation ponds becoming overloaded</b>	Discharges exceeding resource consent conditions resulting in fines	Possible
*In this summary the likelihood presented is following the implementation of controls to eliminate, mitigate, and/or manage the hazard		

## 3 PUTTING THE PAPERWORK INTO PRACTISE

### 3.1 PLANNING

Planning is a key factor for successfully putting the paperwork into practice. Forward planning prior to taking the trickling filters off line was critical to managing the hazards and the associated risks that had been identified through the JSTA and SiD.

The trickling filters at the CWTP are hydraulically limited, particularly in winter. In Christchurch in winter there is more rainfall and the ground water level is higher. With the earthquake damage to the underground wastewater pipe network, there is significant ingress of water into the wastewater pipework. This results in a

higher volume of lower concentration wastewater arriving at the CWTP for treatment and a higher flow through the trickling filters. At these higher flows both trickling filters are required to be in operation.

During the summer months the flow of wastewater through the CWTP is lower. In the driest summer months (December through to March) it is possible to have only one trickling filter in operation and still achieve adequate wastewater treatment. For this reason the trickling filter repairs were scheduled for the summer months of January through to March.

Relying solely on dry summer weather was considered high risk. Christchurch can have significant wet weather events in the middle of summer. In a summer storm event (high rainfall), a single trickling filter would struggle to treat the full wastewater flow. Thus back-up plans were put in place to actively manage the wastewater treatment:

- The operation of the solids contact tanks was changed. Normally this unit process operates in two parallel trains; one for each trickling filter. Instead the solids contact tanks were temporarily reconfigured so that the wastewater flowed through the tanks in series. This facilitated floc formation by making full use of the solid contact tank volume and improved solids settling in the down-stream clarifiers.
- Operating a higher flow through a single trickling filter can increase biomass sloughing and result in a smaller biomass particle being sloughed off. These smaller particles make floc formation problematic (in the solid contact tanks) and as a result be difficult to separate (in the clarifiers). This would result in excessive biomass being carried out to the polishing ponds, adversely affecting the pond performance and resulting in significant malodorous discharges. To mitigate this, flocculent dosing equipment was put on standby and a suitable polymer flocculant was sourced. This flocculent dosing system was used during the project to improve the performance of the solids contact tanks.
- In a high rainfall event, it was likely that some primary effluent from the primary sedimentation tanks would be by-passed around the secondary treatment (trickling filters, secondary contact tanks and clarifiers), and be diverted directly to the polishing ponds. This partially treated wastewater would have higher concentration of contaminants which, in turn, could negatively affect the pond performance and result in significant malodorous discharges. To mitigate this, a chemical dosing system, using hydrogen peroxide, was put on standby. This dosing equipment would be used to dose hydrogen peroxide directly into the bypassed wastewater, increasing the oxygen concentration of the wastewater, and thereby boosting the performance of the ponds. This back-up chemical dosing system was not used during the project.

## **3.2 CONSTRUCTION**

The contractor was engaged under at NZS3910 contract. The contractor was required to prepare a Site Specific Health and Safety Management Plan. This plan provided information on how safety would be managed on the construction site. It included traffic management, people health and safety management, environmental management, and work method statements.

Daily, weekly and monthly site inspections were undertaken to monitor health and safety on the work site. The daily and weekly site inspections were carried out by the contractor, whilst the monthly inspections were carried out by a specialist health and safety practitioner. The purpose of these inspection was to practically identify potential hazards and address these before an incident occurred. The following hazards were identified during construction:

- A power cord on electrical equipment. The necessary testing was carried out.
- Scaffolding that had an out of date “scaff-tag”. The scaffold was reviewed and a new tag issued
- Inadequate fencing around the construction. Additional fencing was installed.

Personnel access to site was carefully managed. The CWTP is an operating wastewater treatment plant, with operations, maintenance staff moving around. Also, maintenance staff were undertaking works in the same space as the contract works. This was managed through regular project meetings and programme updates. At these meetings health and safety was specifically included on the agenda. The interface between the contractor's activities and CWTP maintenance and repair activities was a high risk that needed to be actively managed. These activities were identified during the JSTA, which allowed solution to developed well in advance of the works being undertaken

CWTP site wide weekly toolbox meeting, where activities on site are discussed by operations and maintenance staff. This provided a mechanism for circulating information around CWTP.

### **3.3 PROGRAMMING WORKS**

With the range of people involved in this project, coordinating these inputs was critical to keeping people, plant/equipment and the environment safe. A comprehensive project programme was developed. The programme for the second half of the works is shown in Appendix A. This included the contractor's construction programme and the operations staff maintenance programme. Programming provided a mechanism for clearly demonstrating what activities were being undertaken, when, and by whom. Hazards associated with each achieved were then readily communicated around the project team.

The programme was a live document, particularly while the earthquake damage assessments were being undertaken. During this phase the programme was updated to show activities required to undertake these additional repairs.

## **4 OUTCOME**

JSTA effectively identified hazards to people and the plant/equipment. SiD methodologies identified environmental hazards. SiD methodologies, JSA methodologies and programme planning were invaluable tools for achieving this. Contingency plans are a necessity, especially for events you cannot control, such as the weather.

There was a single incident during the construction phase of this project. This occurred while the preparations were being made to deconstruct the central rotary distribution tower. The trickling filter had been isolated using slide gates. One of these gates had failed to completely close. A wet weather event occurred, subtly changing the hydraulics through the CWTP. Partially treated wastewater flowed back though this incorrectly closed gate valve, backed up the distribution tower and then trickled down onto a worker beneath. Work immediately halted while the situation was remedied and a physical break was put in the feed pipework.

Given that the construction phase of the project duration spanned 18 month, this is a very good outcome.

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- CWTP Operations Team
- G&T Construction, especially Lex Thomson, General Manager



**APPENDIX A**

**PROGRAMMES OF WORKS FOR TRICKLING FILTER 2 REPAIRS**

