

## OHS IMPROVEMENT NOTICE

To: PTTEP Australasia (Ashmore Cartier) Pty Ltd – “Operator”

In conducting OHS inspection 1832 in relation to the Montara Venture facility, I, [REDACTED], a NOPSEMA inspector appointed under section 602 of the Act, am satisfied on reasonable grounds that the person named above as the responsible person is contravening, or has contravened and is likely to contravene again clause 9(2)(d) of Schedule 3 to the Act at the Montara Venture Facility.

The reasons for my opinion are:

As a result of the inspection a NOPSEMA inspector had issued the Operator an OHS Prohibition Notice 0711 on 6 September 2018 to prohibit the use of the Turbine Driven Gas Compressor on the Montara Venture facility. Due to degradation of the insulation, some external sections of the exhaust ducting of this equipment had been operating at temperatures exceeding the maximum permitted temperature or “Performance Standard” (200°C) for the hazardous area, creating an ignition risk. The management of this risk is collectively a “safety critical control”. Whilst the Prohibition Notice removed the immediate risk, it did not address the actions of the Operator that led to this condition occurring.

In the time prior to inspection 1832, the Operator had conducted a risk assessment and had concluded that it was safe to operate the equipment at up to 350°C with a condition that if the temperature were to exceed 350°C “*would require a revisit of [the] Risk Assessment.*”

During the inspection, the inspector became aware that recorded temperatures had indicated exceedance of 385°C, however:

- there was no evidence of a risk assessment having been “revisited” to justify continued operation,
- no decision was made to shut-down the turbine to eliminate the hazard, and
- no additional mitigating measures were put in place to mitigate the increased risk.

This series of failures demonstrated that the Operator had not adequately been managing the risks of its operations in relation to the loss or degradation of safety critical controls to the extent that they are outside of their Performance Standard. The principle of this management of safety critical controls applies across the entire facility.

As a result of this contravention I am satisfied that there is, or may be, the following risk to the health or safety of any person:

The potential for a major accident event on the facility due to the failure to implement adequate controls to reduce risk in the event of the loss or degradation of safety critical controls to the extent that they fail to meet their performance standards.

You are required to take action within **90** days of the date of this notice to prevent or reduce the risk.

The following action must be taken by the responsible person within the period specified above:

- implement systems or procedures whereby in circumstances where the loss or degradation of safety critical controls, such that they fail to meet their performance standards, may potentially reduce

levels of safety at the facility, operations are stopped or maintained within the limits of additional safety critical controls applied to keep the risks to as low as reasonably practicable until operation within the performance standard can be restored, or

- implement such other controls as required to reduce risk to a level that is ALARP.

**Signed:****NOPSEMA Inspector****Dated: 14 September 2018**

NOTES: (Please see back of notice)

The following section is to be completed if serving the notice to the responsible person by giving it to the operator's representative or titleholder's representative at the facility, or the identified responsible person onshore.

This notice was delivered to: \_\_\_\_\_

(insert name)

in the office or position of \_\_\_\_\_

(insert office or position)

at: \_\_\_\_\_ am/pm on \_\_\_\_\_

(insert time)

(insert date)

When the required improvement has been completed, return this part of the notice to the following person at the address below:

Name: 

Position: NOPSEMA Inspector

Address: Send in electronic format via email to:

[submissions@nopsema.gov.au](mailto:submissions@nopsema.gov.au)

Telephone number: +61 8 6188 8700

Specify the action that has been taken to comply with this notice in the space below.

Improvement Notice No. **714** has been complied with by:

Signed: \_\_\_\_\_ Date: \_\_\_\_\_

**NOTES:**

1. Under clause 78 of Schedule 3 to the Act, a person who fails to ensure that this notice is complied with, to the extent that it relates to a matter over which the person has control, may be liable to a penalty of 300 penalty units or a civil penalty of 400 units.
2. This notice must be displayed in a prominent place at or near each workplace at which work affected by the notice is being performed and, must not be tampered with or removed before the notice has ceased to have effect.
3. If the notice is not issued by being given to the operator's representative at the facility, the responsible person (unless the responsible person is the titleholder) must cause a copy of the notice to be given to the operator's representative.
4. If the responsible person is the operator or an employer (other than the operator) of members of the workforce, the operator's representative at the facility must give a copy of the notice to each health and safety representative for a designated work group having group members performing work that is affected by the notice.
5. If the responsible person is the titleholder, as soon as practicable after issuing the notice, the NOPSEMA inspector will take reasonable steps to give a copy of the notice to the operator and, if the NOPSEMA inspector is at the facility when the notice issued, the operator's representative at the facility.
6. If the responsible person is the titleholder, but the inspector is not at the facility when the notice is issued, the operator must give a copy of the notice to the operator's representative at the facility.
7. As soon as practicable after issuing the notice, the NOPSEMA inspector will take reasonable steps to give a copy of the notice to, where applicable:
  - (a) the employer of an employee who is a member of the workforce if the notice is issued to the employee, and in connection with work performed by the employee, and
  - (b) the owner of any workplace plant, substance or thing that the notice relates to, unless the owner is the responsible person or an employer referred to in (a), and
  - (c) if the responsible person is the owner of any workplace, plant, substance or thing because of which the contravention has occurred, or is likely to occur: the operator of the facility, and if the employer of employees who work in that workplace or who use that plant, substance or thing is a person other than the operator—that employer; and
  - (d) the titleholder, if the responsible person is the operator, and the contravention relates, or is likely to relate to, the titleholders' well related obligations.
8. Under item 8 of subclause 80A(1) of Schedule 3 to the Act, any of the following persons may in writing request the reviewing authority to review the NOPSEMA inspector's decision:
  - the operator of the facility
  - the titleholder, if the notice is issued to a titleholder;
  - any other person to whom the notice has been issued;
  - an employer, if affected by the decision;
  - a relevant health and safety representative;
  - a relevant workforce representative, if requested by a member of the workforce affected by the decision;
  - a person who owns any workplace plant, substance or thing to which the NOPSEMA inspector's decision relates.
9. An improvement notice ceases to have effect when the responsible person takes the action specified in the notice.