

# APP203827 Proposal to amend the Fire Fighting Chemicals Group Standard 2017

Submission Reference no: 21

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**Submitter Type:** Not specified  
**Source:** Web Form  
**Overall Position:** I oppose some of the proposals

## Overall Notes:

### Clause

What is the reason for making the submission?

#### Notes

In New Zealand Beach Energy operate Kupe Production Station and Kupe Omata Tank Farm located in Taranaki. Both sites include storage tanks for condensate and operate under Safety Cases approved by Worksafe NZ. There is approximately 18,000L of fire fighting foam stored across the two sites, which was changed in 2017/2018 from 'C8' fire-fighting foam to 'C6' fire-fighting foam. Our submission requests that sufficient time is provided to change to fluorine free foams, and for exemptions to be available for applications where fluorine free foams are not suitable. From our discussions with suppliers, fluorine-free concentrate options are limited for some applications and may not perform effectively in some existing firefighting systems.

### Clause

Do you wish to speak at a hearing?

#### Position

Yes

#### Notes

### Clause

What is your preferred outcome of this consultation?

#### Notes

- Option 2 for phasing out C6 firefighting foams is adopted which would allow the EPA to grant permissions for companies to continue to use C6 firefighting foams after the phase out period is completed. This would allow for the foam to be replaced at the end of its useful life, and once a suitable product for the system is identified, rather than in 5 years time. - Changes are made to the proposals to provide exemptions for hydrocarbon storage tank systems where fluorine free foams are not effective.

### Clause

Do you consider there are any applications for which fluorine-free foams are not suitable or do not have relevant approvals? If yes, please specify.

#### Position

Yes

#### Notes

Our foam supplier has advised that our hydrocarbon storage tanks with a sub-surface injection system are not suitable for use with fluorine free foams. We therefore request an exemption for this system.

### Clause

What do you think of the practicality of these disposal provisions, in terms of the resources and costs involved?

#### Notes

Without seeing the proposed EPA guidance on what is considered to be 'as far as reasonably practicable' it is difficult to comment on the practicality. The cost of disposal of washwater is the main consideration for cleaning requirements.

**Clause**

Would your business be able to contain all foam wastes?

**Position**

No

**Notes**

This is due to practical difficulties - most systems where foam may be applied in an incident are bunded; however, there is potential for overflow depending on the amount that may be used by emergency services to respond to an incident. The consultation document notes an exemption for emergency incidents.

**Clause**

If not, is this due to cost or practical difficulties?

**Position**

Practical difficulties - please specify

**Notes**

This is due to practical difficulties - most systems where foam may be applied in an incident are bunded; however, there is potential for overflow depending on the amount that may be used by emergency services to respond to an incident. The consultation document notes an exemption for emergency incidents.

**Clause**

Do you agree with phasing out C6 AFFF at the same timeframe as C8 AFFF?

**Position**

No - please tell us why

**Notes**

- It is important that we are allowed to use a product that can reliably and effectively extinguish a fire in a hydrocarbon storage tank in order to minimise effects on the surrounding community should an incident occur. - In 2017/2018 Beach Energy changed its fire fighting foam systems from C8 to C6 foams. The C6 foam is contained and fit for purpose. There are no intended releases of C6 foam to the environment from the systems. They would only be used in an incident. - The phase out of C6 fire fighting foams is not required by the Stockholm Convention.

**Clause**

Which is your preferred option?

**Position**

Grant permissions to continue to use C6 foams

**Notes**

Beach Energy requests "Option 2" allowing permissions to be granted under section 95A of the HSNO Act, for companies to continue to use C6 firefighting foams for an approved period after the phase out period is completed.

**Clause**

What are your reasons?

**Notes**

- It is important that we are allowed to use a product that can reliably and effectively extinguish a fire in a hydrocarbon storage tank in order to minimise effects on the surrounding community should an incident occur. - In 2017/2018 Beach Energy changed its fire fighting foam systems from C8 to C6 foams. The C6 foam is contained and fit for purpose. There are no intended releases of C6 foam to the environment from the systems. They would only be used in an incident. - The phase out of C6 fire fighting foams is not required by the Stockholm Convention.

**Clause**

Can you estimate the cost to your business of phasing out C6 AFFF?

**Position**

Yes - please specify

**Notes**

Beach Energy holds stocks of approximately 18,000 Litres of C6 foam. It would cost at least \$8 per litre to dispose of the old foam, and approximately \$13 per litre to replace it with a fluorine free foam, which equals approximately \$400,000. There would also be costs associated with disposal of washwater from changing the foam.

**The submitter have elected to withhold their personal details from publication.**