

APP203827 Proposal to amend the Fire Fighting Chemicals Group Standard 2017

Submission Reference no: 20

Bob Brady, Methanex NZ Ltd (Bob Brady)

Submitter Type: Not specified
Source: Web Form
Overall Position: Support in Part

Overall Notes:

Clause

What is the reason for making the submission?

Notes

Methanex carries comprehensive stocks of fire-fighting foam (C6) due the production and storage of Methanol over 4 sites in North Taranaki

Clause

Do you wish to speak at a hearing?

Position

No

Notes

Clause

What is your preferred outcome of this consultation?

Notes

That a workable solution to the phase out of fluorine based foams is found for industry which also satisfies environmental/health concerns

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.

Notes

We are still in the evaluation stage of alternative foams that are suitable for alcohol based fires

Clause

Would your business be able to contain all foam wastes?

Notes

Potentially not, in the event of a catastrophic failure

Clause

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

Notes

There are potentially both practical and cost difficulties

Clause

Do you have any concerns about fluorine-free foams potentially containing other persistent, toxic and/or bioaccumulative compounds?

Notes

We believe there is insufficient knowledge/experience to comment on this

Clause

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

Position

No - please tell us why

Notes

We are currently surveying the market for fluorine free foams that could effectively fight a methanol fire, including for large atmospheric storage tank fires. Due diligence will need to be carried out to ensure that the fluorine free foam is as effective , if not better, before we can fully phase out the existing C6 based foams. Hence, we are concerned that the full transition may not be completed within the time period being allowed to phase out the C6 based foams which are used at present”

Clause

Which is your preferred option?

Position

Grant permissions to continue to use C6 foams

Notes

For a longer time period than currently proposed

Clause

What are your reasons?

Notes

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Clause

Do you have any other comments to make about the proposed amendments?

Notes

“Methanex is generally supportive of the phase out of fluorine based foams, however we are concerned that the full transition may not be completed within the time period being allowed to phase out the C6 based foams which are used at present”

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