

APP203827 Proposal to amend the Fire Fighting Chemicals Group Standard 2017

Submission Reference no: 7

Aaron Thorburn, **RefiningNZ**

Port Marsden Highway

Ruakaka

Whangarei

Northland

New Zealand

Ph: 094328311

aaron.thorburn@refiningnz.com

Submitter Type: Not specified

Source: Web Form

Overall Position: Support in Part

Overall Notes:

Clause

What is the reason for making the submission?

Notes

Further clarification on the changes proposed to the the Group Standard

Clause

Do you wish to speak at a hearing?

Position

No

Notes

Clause

What is your preferred outcome of this consultation?

Notes

Agreement of the proposed changes after appropriate consultation and clarification on points have been discussed.

Clause

Would your business be able to contain all foam wastes?

Position

No

Notes

We use a Class A (Forestry fire-fighting foams) training foam (Solberg DoD3155) on our training ground facility, which is water and detergent this is currently contained and heavily diluted via a retention basin system and from there into a stormwater basin which has to meet criteria before being discharged to the harbour. Is this considered as containment under the proposed amendments, keeping in mind this is a Class A foam which has not been mentioned in the proposal at any stage, is diluted from its concentrate foam, diluted in a retention holding basin then diluted further in a stomwater basin, is this considered to be containment of foam wastes, or what is suggested?

Clause

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

Position

Practical difficulties - please specify

Notes

see above

Clause

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

Position

Yes

Notes

Clause

Which is your preferred option?

Position

Phase out C6 and C8 firefighting foams at the same time

Notes

Clause

What are your reasons?

Notes

Would make sense to get them at the same time as well as providing advise on what to use and using the approval process to determine foams that can be used to assist with industry moving forward

Clause

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

Notes

No discussion about Class A foams which is what we use at RefiningNZ (Solberg DoD355 training foam at our fire training ground facility).