Consultation on Hazardous Substances Safe Work Instruments Response Form

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| Responses close: **5 pm on Friday 8 September 2017** Email to: Regulatory.Frameworks@worksafe.govt.nzOR send by post to: Consultation on Hazardous Substances Safe Work Instruments,WorkSafe New Zealand PO Box 165, WELLINGTON 6140 Attention: Regulatory Frameworks Please put **Consultation on Hazardous Substances Safe Work Instruments** in the subject line |

## Submission on: Health and Safety at Work (Hazardous Substances­­ - Above Ground Rotationally-Moulded Polyethylene Stationary Tanks) Safe Work Instrument 2017

Please use this response form to record your feedback.

If you are mailing your submission please add your contact details in the space provided. If you are emailing back this document, please add an email signature or similar with your contact information.

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| Name of responder (or contact for joint response): |  |
| Organisation name (and position if on behalf of an organisation): |  |
| Postal address: |  |
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| Telephone number: |  |
| Email:  |  |
| Do you currently use **HSNOCOP 12 Rotationally Moulded Polyethylene (PE) Tanks to AS/NZS 4766 for Non Flammable Hazardous Substances** to help ensure you are compliant under the HSNO regime?  |  |
| Do you currently use **HSNOCOP 61 Rotationally Moulded Polyethylene Storage Tanks for Non Flammable Hazardous Substances** to help ensure you are compliant under the HSNO regime?  |  |

[ ]  I wish to keep my contact details confidential

WorkSafe New Zealand will manage any personal information you supply in accordance with the Privacy Act 1993. If your response is made publicly available, your contact details will be removed only if you have indicated this as your preference in the tick box above.

WorkSafe New Zealand may post your response on its website: [www.worksafe.govt.nz](http://www.worksafe.govt.nz)
We may make your response available if answering a request under the Official Information Act 1982.

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| **General comments** |
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| **Specific questions on the draft Health and Safety at Work (Hazardous Substances ­­- Above Ground Rotationally-Moulded Polyethylene Stationary Tanks) Safe Work Instrument 2017** |
| Does the proposed safe work instrument incorporate existing requirements provided in HSNO COP 61 clearly for you to comply with? Do you have any comment on the standards proposed to be incorporated by reference into the safe work instrument?  |
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| Clause 7 Structural analysis 7(1) provides that “A relevant PCBU must ensure that the structural analysis of the design of a tank is carried out using the FEA method using a geometric non-linear analysis solver (GNA)”. Do you think it would be helpful if the following additional wording would be useful following the above sentence?:“ or linear geometric analysis in cases where,—(i) the designer can demonstrate there is no significant difference between the displacement and stress results generated by linear geometric analysis and those generated by GNA; or(ii) the results produced by linear geometric analysis are conservative compared with those obtained using GNA.”Please explain your answer. Clause 10 Stability limit statesDo you think an additional provision should be included in subclause 2 to provide for the method of "placement of outlet holes such as the liquid withdrawal nozzels at a height that achieves stability by a minimum mass of stored contents within the tank"? Please explain your answer.   |
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| Clause 11 Thickness of tank walls The term "elevated temperatures" is used in clause 11(5). WorkSafe would like feedback on what PCBUs interpret this term to mean. How may WorkSafe further describe this term to help PCBU's understand this term better?  |
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| Clause 12 Design of fittings and access holes Clause 12(a) referes to “mechanical fittings” rather than “fiction welded and bolted fittings”. Do you agree with this change or do you see any potential consequences in response to this change? Please explain your answer. |
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| Clause 14 Mechanical properties of resinClause (4)(a) provides for “density not less than 934 kg/m³”. Do you agree with the minimum density prescribed here? Or do you agree that this can be increased? Please provide the amount you think this should be increased to.  |
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| Clause 23 Production test As part of the production testing carried out on the tank, do you agree that compressed air testing should also be an allowed and required type of production test for this tank? Please explain your answer. |
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| Clause 26 Testing after installationThis clause requires the tank to be filled with water for 10 minutes to detect any leaks. Is there an existing issue using water for this test when the substance to be stored in the tank is not compatible with water? Do you think a different or additional substances should be allowed to be used to test the tank for leaks? Please explain your answer.  |