

GAS ENERGY AUSTRALIA

SUBMISSION

**GAS ENERGY AUSTRALIA
SUBMISSION TO
WORKSAFE VICTORIA
ON
PROPOSED CODE OF PRACTICE FOR THE STORAGE
AND HANDLING OF DANGEROUS GOODS**

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1 May 2013

Manager, Information & Guidance Branch
WorkSafe Victoria
GPO Box 4306
Melbourne VIC 3001

Via email: storageandhandling2012@worksafe.vic.gov.au

See Distribution

GAS ENERGY AUSTRALIA
SUBMISSION TO
WORKSAFE VICTORIA
PROPOSED CODE OF PRACTICE FOR THE STORAGE AND HANDLING OF
DANGEROUS GOODS

Dear Sir

Gas Energy Australia is pleased to make a submission in response to the Proposed Code of Practice for the Storage and Handling of Dangerous Goods (CoP-DG) - released in April 2013.

1. Background

Gas Energy Australia, until recently LPG Australia, is the national peak body which represents the bulk of the downstream alternative gaseous fuels industry which covers LPG, LNG and Compressed Natural Gas (CNG). The industry comprises major companies and small to medium businesses in the alternative gaseous fuels supply chain; refiners, fuel marketers, equipment manufacturers, vehicle converters, and the providers of services to the industry.

Gas Energy Australia offers the following responses to make the CoP-DG clearer and less ambiguous.

2. Response to the consultation paper

Gas Energy Australia draws attention to the following items which should be addressed in order to make the CoP-DG clearer and less ambiguous;

- a. Amending Section 3.2 *Dangerous Goods at non-workplaces* to clearly exclude LPG in the domestic situation;

- b. Clarifying the example used in Section 14.c *Manufacturing and transport processes at the premises involving the dangerous goods*;
- c. Amending Section 27 *Protection from impact* to remove the need for a definition for a high traffic area;
- d. Clarifying Section 28 *Spill containment* to include a differentiation for non-vapourising gas; and
- e. Renaming Section 31.2 *Inerting and purging* to clearly show this section refers to a confined space

Gas Energy Australia has prepared a detailed response including proposed wording changes. This is included as Enclosure 1 Gas Energy Australia - Public Comment WorkSafe Victoria - Proposed Code of Practice for the Storage and Handling of Dangerous Goods – FINAL. The enclosure is in the style and formatting required by WorkSafe Victoria for submission of public comment to the CoP-DG.

3. Conclusion

Gas Energy Australia commends WorkSafe Victoria's work in the Dangerous Goods area and is committed to working with WorkSafe Victoria to achieve a safe and robust future for gaseous fuels in Victoria. Gas Energy Australia believes that the simple clarifications outlined above will make the CoP-DG a much clearer and user friendly document,

4. Recommendations

Gas Energy Australia recommends that WorkSafe Victoria adopt the minor changes outlined the enclosure to remove any ambiguity in the CoP-DG.

Gas Energy Australia welcomes the opportunity to assist WorkSafe Victoria. Additional information or clarification can be directed to the Manager Technical Development Mr Darryl Ramm via email dramm@gasenergyaustralia.asn.au or by phoning 02 6176 3105.

For your consideration.

Yours sincerely

A handwritten signature in black ink, appearing to read "M. Carmody", with a horizontal line underneath.

Michael Carmody
Chief Executive Officer

Enclosure: 1. Gas Energy Australia - Public Comment WorkSafe Victoria - Proposed Code of Practice for the Storage and Handling of Dangerous Goods - FINAL

Distribution: WorkSafe Victoria

For Information:

Gas Energy Australia Safety Standards and Technical Committee

Gas Energy Australia State Representatives

Gas Energy Australia Technical Committee Chairs

Gas Energy Australia Secretariat

Proposed Code of Practice for the Storage and Handling of Dangerous Goods
Template for Public Comment

To: DG Code Public Comment Manager, Information & Guidance Branch Email: storageandhandling2012@worksafe.vic.gov.au Post: WorkSafe Victoria GPO Box 4306 MELBOURNE VIC 3001 Closing Date: Thursday 2 May 2013	From: Gas Energy Australia Darryl Ramm Email: drammm@gasenergyaustralia.asn.au Phone: 02 6176 3105 Date of Comment: 1 May 2013
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SPECIFIC COMMENTS

Page Number	Section/Subsection & Heading/Subheading (if appropriate)	Recommended Changes/Suggested Wording & Reason for Suggestion
Part 1		
Part 2		
Part 3		
8	3.2 Dangerous Goods at non-workplaces	<p>The Regulations include specific exclusions from the regulations for dangerous goods in non workplace situations. LPG in the domestic situation may inadvertently be captured by not specifically being excluded.</p> <p>Suggest that LPG be specifically excluded by the addition of a new dot point to cover common case of domestic BBQ and patio heater, and one for a domestic LPG cylinder</p> <ul style="list-style-type: none"> • dangerous goods in the fuel container of a domestic or portable fuel burning appliance • LPG cylinders connected to supply a domestic installation
19	14.c Manufacturing and transport processes at the premises involving the dangerous goods	<p>To provide a clear and correct example under Section 14 Hazard Identification Gas Energy Australia recommends the following wording as an appropriate example in section 14 c.</p> <p><i>“...For example, the process of pumping liquefied gas may be hazardous. Running an LPG pump dry (without liquid) beyond manufacturer’s recommended maximum time could cause the pump to overheat – thus resulting in subsequent damage to the pump’s mechanical seal, resulting in a potential mechanical seal failure and leakage. The possibility of dry running should be removed by providing adequate measures in either the system design, its operation or by other ancillary means such as installation of dry running protective equipment...”</i></p>
41	27 Protection from impact	<p>In the absence of a definition of high traffic areas</p> <p>Suggested amended text;</p>

		The most effective way to protect against damage by impact in a non-controlled vehicle movement environment, is to locate the dangerous goods, structures and plant away from trafficable areas and to restrict vehicle access in areas where the dangerous goods, structures and plant are located.
41	28 Spill containment	Suggest the differentiation of non vapourising liquids be included in the regulation. Suggested amended text; eliminate the risk from any spill or leak of solid or non vapourising liquid dangerous goods, or etc.
48	31.2 Inerting and purging	Purging is an industry term which also covers clearing a containment of air for example and replacing with a flammable material or product. In the instance of purging a gas line of air and then filling with a dangerous good. The section 31.2 Inerting and Purging used in the regulation is included under 31. Ventilation and Atmospheric emissions. To avoid confusion it is recommended that section be retitled 31.2 Inerting and Purging of a confined space
Appendix 1		
Appendix 2		
Appendix 3		
Appendix 4		
Appendix 5		
Appendix 6		
Appendix 7		
Appendix 8		

GENERAL COMMENTS

1. 2. 3.
