

LP Gas cylinder clearances to gullies

Practitioners will be fully aware of the requirement that an opening to a drain cannot be located within the exclusion zone of an LP Gas cylinder.

There has, however, been some uncertainty in the industry relating to whether or not a gully dish, with its water seal, constitutes an opening or not.

Worksafe, has now clarified that a gully dish is considered an opening and must be closed in some manner if it is to be situated within an exclusion zone of the LP Gas cylinder.

Regulators

The regulators responsible for LP Gas cylinders in New Zealand are:

WorkSafe – WorkSafe New Zealand is the organisation that enforces the rules relating to the use, handling and storage of hazardous substances in the *workplace* under the Health & Safety at Work Act (Hazardous Substances) Regulations 2017 (HSW HS).

The Environmental Protection Authority (EPA) – The EPA is the regulator for the use, handling and storage of hazardous substances in *non-workplaces* (which is enforced by Councils).

Regulations

In summary, the position in relation to both workplaces and non-workplaces (including residential properties) is that no openings to drains may be located within the LP Gas cylinder exclusion zone.

Gully Traps

There has been quite a bit of debate in the industry about whether or not gully traps could be considered an opening and initially there was no real guidance issued by the Regulators about this issue.

As part of 2017 CPD the Board attempted to obtain clarification from the responsible regulators but was unable to obtain a definitive answer.

The comment was made as part of CPD that it was up to the certifier in every case to ensure that they are satisfied with the safety of their installations. In relation to gully traps it was noted that their position was not clear but perhaps the required water seal would stop the passage of gas into the sewer system.

Clarification from WorkSafe

The Board recently received clarification from WorkSafe on the issue of whether a gully trap is an 'opening' to a drain.

WorkSafe have commented:

"A gully trap is an opening (whilst it may have a water seal), the trap itself is an opening."

WorkSafe also provided the following solution where the necessary clearance is not possible:

“In order for the gully trap to not be an opening, it must be closed in some manner. A loose plate over the gully trap is not sufficient for this purpose – the plate must be secured in some manner e.g. a tool such as a screwdriver or spanner is required to remove it. The plate needs to be vapour proof however it is impractical to insist on a sealed joint between the plate and the gully trap – a close fit will suffice.”

Please note: When sealing the gully surround, adequate ventilation needs to be provided to ensure the proper functioning of the gully.

Useful links:

[Hazardous Substances \(Hazardous Property Controls\) Notice 2017](#)

[Health & Safety at Work Act \(Hazardous Substances\) Regulations 2017](#)

[Summary of the roles of the EPA and WorkSafe](#)