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Proposed Change 1965

Code Reference(s):	NBC20 Div.B 3.1.1. (first printing)
Subject:	Building Fire Safety
Title:	Removal of the Term "Storage Tank" from Part 3 of the NBC
Description:	This proposed change removes the definition of "storage tank" for the purposes of Part 3 by removing Article 3.1.1.3. from the NBC.
Related Code Change Request(s):	CCR 1880
Related Provision(s):	NBC 2020 Div. B 3.1.1.3.

This change could potentially affect the following topic areas:

- | | |
|--|--|
| <input type="checkbox"/> Division A | <input checked="" type="checkbox"/> Division B |
| <input type="checkbox"/> Division C | <input type="checkbox"/> Design and Construction |
| <input checked="" type="checkbox"/> Building operations | <input type="checkbox"/> Housing |
| <input type="checkbox"/> Small Buildings | <input checked="" type="checkbox"/> Large Buildings |
| <input type="checkbox"/> Fire Protection | <input type="checkbox"/> Occupant safety in use |
| <input type="checkbox"/> Accessibility | <input type="checkbox"/> Structural Requirements |
| <input type="checkbox"/> Building Envelope | <input type="checkbox"/> Energy Efficiency |
| <input type="checkbox"/> Heating, Ventilating and Air Conditioning | <input type="checkbox"/> Plumbing |
| | <input type="checkbox"/> Construction and Demolition Sites |

Problem

The term "storage tank" was introduced in Part 3 of Division B of the NBC 2010, when Subsection 3.3.6. was also introduced. At that time, the definition was justified because the term was used in many of the referenced standards related to fuel tanks. As a result, Article 3.1.1.3. of the NBC 2020 currently defines "storage tank" for the purposes of Part 3.

However, Part 3 of the NBC does not contain any prescriptive requirements that specifically mention storage tanks or any other references to this term. As such, it was suggested that Article 3.1.1.3. be removed. Keeping it could potentially lead Code users to misinterpret the requirements as being more stringent than intended.

Justification

This proposed change deletes the definition of "storage tank" for the purposes of Part 3 by removing Article 3.1.1.3., on the basis that there are no references made to this term in Part 3.

Defining a term for the purposes of Part 3 and then not referring to that term anywhere in the Part could cause confusion for Code users when they try to understand and apply the requirements related to tanks. Retaining the definition could potentially lead to the requirements being misinterpreted as being more stringent than otherwise intended (also resulting in increased costs).

Furthermore, as flagged by Alberta Municipal Affairs, removing Article 3.1.1.3. eliminates a technical variation between the NBC and the National Building Code - Alberta Edition, which does not include this definition.

PROPOSED CHANGE

NBC20 Div.B 3.1.1. (first printing)

[3.1.1.1.] 3.1.1. Scope and Definitions

[3.1.1.1.1.] 3.1.1.1. Scope

[3.1.1.1.2.] 3.1.1.2. Defined Words

~~[3.1.1.1.3.] 3.1.1.3. Use of Term Storage Tank~~

~~**[1] 1)** For the purposes of this Part, the term "storage tank" shall mean a vessel for flammable liquids or combustible liquids having a capacity of more than 230 L and designed to be installed in a fixed location.~~

[3.1.1.1.4.] 3.1.1.4. Fire Protection Information

Impact analysis

This proposed change would clarify existing Code provisions and facilitate enforcement.

There is no increase in construction costs anticipated as there is no change to the intent or application of the Code provisions regarding tanks.

Enforcement implications

The clarification of current Code provisions facilitates consistent interpretation and enforcement by regulators.

There will be less confusion for or potential misinterpretation by regulators as they enforce the Code.

Who is affected

Builders, consumers, manufacturers, regulators and designers.

OBJECTIVE-BASED ANALYSIS OF NEW OR CHANGED PROVISIONS

NBC20 Div.B 3.1.1. (first printing)

[3.1.1.1.] 3.1.1.1. ([1] 1) no attributions

[3.1.1.2.] 3.1.1.2. ([1] 1) no attributions

[3.1.1.4.] 3.1.1.4. ([1] 1) no attributions