

Our ref: R90/0897-13 Sub-557

30 November 2018

NSW Environment Protection Authority
PO Box A290
SYDNEY SOUTH NSW 1232

Via email: UPSSREG@epa.nsw.gov.au

Draft Practice Note – Managing run-off from service station forecourts

Thank you for the opportunity to comment on the draft *Practice Note – Managing run-off from service station forecourts*, which has been developed by the EPA to provide guidance to both industry and regulators (largely councils) on how to protect the environment from potentially polluted run-off.

LGNSW welcomes and supports the EPA's efforts to provide guidance on managing the issue of service station forecourt run-off. Clear guidance is needed to give both the industry and councils greater certainty on what measures are expected at service stations to avoid the generation of polluted run-off, as well as the standards expected for treating and managing polluted run-off.

The draft practice note explains measures to avoid and mitigate the volume of polluted run-off requiring treatment, such as bunding and covering bowser areas. The diagram is particularly useful in describing these measures succinctly.

The draft practice note then outlines options for managing run-off from high risk zones (such as refuelling areas). The three approaches outlined are (a) collection in a blind sump/pit for pump out and disposal, (b) discharge to sewer, and (c) treatment and discharge to stormwater. Each of these approaches have positive and negative considerations and it would be helpful if these were discussed in more detail within the document.

LGNSW understands that one approach has deliberately not been prescribed because the context and circumstances of each service station will differ, for example in terms of proximity to sensitive receiving environments and access and feasibility of discharge to sewer. However from councils' perspective a major benefit in having a practice note would be that it provides clarity and certainty for both the proponent and council, minimising time and effort required in conditioning consents, and simplifying compliance. While the practice note provides good context and information about best practice, it is not definitive enough to give the certainty many councils seek.

LGNSW suggests that the practice note include more specific detail on the recommended approaches to collecting and disposal of forecourt run-off. This could be incorporated into more detailed case studies or worked examples that cover off some of the more common circumstances found in NSW eg metropolitan / regional / remote settings, access/no access to sewer.

With regard to the quality of discharges to stormwater, the note refers to considering the environmental values of the receiving waters in determining the level of treatment and using key indicators in ANZAST (Water Quality Guidelines) to consider if a risk to those values is posed. This process can be quite complex, particularly for those that do not regularly use Water Quality Objectives and ANZAST guidelines or those less familiar with potential pollutants arising from service station forecourts. LGNSW suggests that the note be made more accessible by providing a list of common pollutants and key indicators that proponents, planners and regulators should consider. The list would not need to be exhaustive, but provide a solid starting point for council staff to review, and the list could be included as part of the worked examples / case studies.

The maintenance of measures and treatment systems on site is critical to ensuring they achieve the environmental protection outcomes they are designed for. LGNSW recommends that the practice note articulate a minimum standard of maintenance that could be referenced in development consent conditions. It would also be useful if the practice note included key questions or criteria that the proponent should address in their development application, so that councils have the necessary information to properly assess and determine the application.

Should you wish to clarify any of the above points, please contact Susy Cenedese, Strategy Manager, on (02) 9242 4080 or susy.cenedese@lgnsw.org.au

Yours sincerely



Kylie Yates
AI Chief Executive