

Deputy Secretary
EPA Tasmania
Department of Primary Industries, Parks, Water and Environment
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Submission concerning

Environmental Management and Pollution Control (Underground Petroleum Storage Systems) Regulations 2020

Background (not part of the submission as such)

Fusion Australia Ltd currently operates a Service Station at Poatina Tas 7302.

The service Station has a 5,000L above ground Diesel tank – not covered by this legislation. We also have TWO underground storage tanks of 10,000L capacity each. The underground storage tanks are never filled to capacity 5,000L max – our annual turnover is about 70,000L (6,000L Premium , 20,000L Diesel and 44,000L Unleaded).

Poatina Service Station has a long standing arrangement of dipping the tanks weekly and reconciling the reading against the bowser volume. After notification in March this year that the service station is to engage a SIRA service at \$600pa, I have been in conversation with the EPA and I have instituted a more stringent statistical analysis than mere weekly dipping of tanks and reconciling it against bowser volume dispensed. I have not been informed of any reason for why my regime is inadequate, when it is more responsive than a monthly SIRA report.

Poatina Service Station because of the low volume of sales cannot afford to pay staff. A team of trained volunteers acts as service station attendants. The annual \$7,500 gross profit from sales is barely sufficient to cover overheads such as rates and charges, insurance, as well as operating costs such as electricity Making any provision for repair and maintenance as well as upgrading bowsers etc becomes difficult.

The Poatina Service Station is providing a valuable resource to the tourist industry – many tourists comment on the lack of service stations on the trip to and from Queenstown and Lake St Clair. The Poatina Community is also appreciative of the availability of fuel. It would be a pity to have to close it.

Submission

A. Small Storage System definition

Small country service stations that are not a commercial proposition in their own right. They usually are an adjunct to a general store, a food provider, or to an accommodation provider, etc, and would benefit from a more generous definition of a “small storage system”:

I suggest three criteria”

1. Annual turnover not to exceed 100,000L of fuel
2. Individual storage tank capacity not to exceed 10,000L
3. Number of tanks not to exceed 3 (three) – which allows for ULP, PULP and Diesel.

B SIRA

I have no data about how many service stations are operating in Tasmania that are adjuncts to other businesses and act as independent operators. For small operators like Poatina Service Station that provides a service to the Community through volunteers, to have to pay \$600pa to SIRA seems a little heavy handed. For service stations with a turnover of less than 100,000L pa SIRA is statistical over-kill. A less sophisticated scheme would be cheaper to administer, but provide the same safe-guards, if the definition of a small (underground) storage system remains unaltered.

I have attached a sample (ULP) spreadsheet for what we are currently doing to check for fuel egress and water ingress. Instead of supplying information to a commercial SIRA provider, the local council engineer may have sufficient understanding to act as a third party to whom the figures are submitted, for a fraction of the cost, say \$120pa. I am open to suggestions.

Thank you for giving these matters your consideration. If it is Government policy to reverse the drift from the country into the cities, small businesses that provide community services need to be supported, not closed down by what appears to be legislative overkill.

Kind regards,

Walter Abetz

Poatina Service Station

Fusion Australia Ltd

Date	ULP Tank	Delivery	Pump	Tank Usage	Pump Usage	Difference	Cumulative Difference	
1-Apr-19	2990	misread?	71600					Cumulative Difference for PUMP - TANK
8-Apr-19	2300		72418	690	818	128	??	Increasing negative value implies a leak
14-Apr-19	1620		73063	680	645	-35	-35	
24-Apr-19	590	2503	74051	1030	988	-42	-77	
29-Apr-19	2490		74701	603	650	47	-30	max 30 litre error in one reading
6-May-19	1600		75554	890	853	-37	-67	max 60 litre error from week to week
13-May-19	940	3000	76230	660	676	16	-51	-56.25 0.76 litres/hr = 128 litres /week
20-May-19	3260		76869	680	639	-41	-92	anything above a difference of 60 litres
27-May-19	2580		77598	680	729	49	-43	requires investigation
3-Jun-19	1710		78447	870	849	-21	-64	
11-Jun-19	1020	3005	79159	690	712	22	-42	-58.4 av -58.24
17-Jun-19	3400		79805	625	646	21	-21	range -88.24 to -28.24
24-Jun-19	2850		80364	550	559	9	-12	
10-Jul-19	1160	2750	82002	1690	1638	-52	-64	-34.75 Windy conditions
15-Jul-19	3620		82306	290	304	14	-50	Windy conditions
23-Jul-19	2950		82946	670	640	-30	-80	Windy conditions
30-Jul-19	2520		83371	430	425	-5	-85	
6-Aug-19	1800	2520	84101	720	730	10	-75	-70.8 Extra fuel delivered?
12-Aug-19	3650		84744	670	643	-27	-102	No water ingress
19-Aug-19	2840		85546	810	802	-8	-110	
27-Aug-19	2300		86138	540	592	52	-58	
2-Sep-19	1840		86587	460	449	-11	-69	
9-Sep-19	1350	2720	87067	490	480	-10	-79	-82.17
16-Sep-19	3510		87641	560	574	14	-65	Tanks dipped weekly
10-Oct-19	1490		89655	2020	2014	-6	-71	No reconciliation done
14-Oct-19	1030	3000	90105	460	450	-10	-81	-74
21-Oct-19	3340		90799	690	694	4	-77	
28-Oct-19	2630		91511	710	712	2	-75	
5-Nov-19	2270		91879	360	368	8	-67	
11-Nov-19	1610		92522	660	643	-17	-84	windy added 10 litres to tank