



CALTAS PTY LTD  
ABN: 24 053 113 992

HEAD OFFICE  
2-4 Durkins Road  
PO Box 127  
QUOIBA TAS 7310

Tel 61 3 6424 1471  
Fax 61 3 6424 2442

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Mr Wes Ford  
Deputy Secretary  
EPA Tasmania  
Department of Primary Industries, Parks, Water and Environment  
GPO Box 1550  
Hobart Tas 7001

Email: [Enquiries@epa.tas.gov.au](mailto:Enquiries@epa.tas.gov.au)

Dear Mr Ford

**Re: Environmental Management & Pollution Control (Underground Petroleum Storage Systems) Regulations 2020 – Consultation Draft**

We thank you for the opportunity to comment on the above Consultation Draft. Our feedback is provided from Caltas' perspective as an operator of service stations throughout Tasmania.

Caltas is committed to the upgrade of Underground Petroleum Storage Systems (UPSSs) and adherence to UPSS regulations to prevent potential contamination of the environment and impacts on human health. Capital works programs have been initiated which include the replacement or upgrade of tanks and associated pipework, and the progressive installation of automatic tank gauges to improve retrievability and reliability of data to support leak detection systems. However, programs must be completed over time and within budget constraints, and we request the EPA recognise in the development of new regulations that there is a variance in systems across our network with manual dipping extensively used.

More specifically we raise the following items of potential concern or clarification:

**1. Part 1 – PRELIMINARY - Loss Monitoring Procedure**

The Explanatory Paper notes of the *"two current SIRA methods commonly used in Tasmania this is likely to result in a "FAIL" now being triggered when a loss of 0.38L/hr or less is detected"* however r.3 of the draft regulations, **loss-monitoring procedure**, states it must be capable of detecting a leak occurring at a rate of 0.76 litres per hour.

If the new regulations propose halving the current "FAIL" threshold of 0.76 litres per hour we would like to understand the rationale behind this. Simple modelling of historical data indicates that there would be a significant increase in false "FAILS" resulting in increased costs associated with unnecessary leak investigations for no associated benefit to the environment.

**2. PART 2 – INSTALLATION, USE, REPAIR AND REPLACEMENT OF STORAGE SYSTEMS - Equipment Integrity Test (r.10(b))**

We note this clause is consistent with r.9(b) of the current regulations however raise our concerns that the requirement for *an equipment integrity test to be completed after all installation work, including concreting and sealing,* is not practical. Industry practice is to complete testing pre-burial and post backfilling and compacting to ensure the system is tight prior to pouring concrete, thus avoiding potential unnecessary cost of having to break up newly laid concrete.

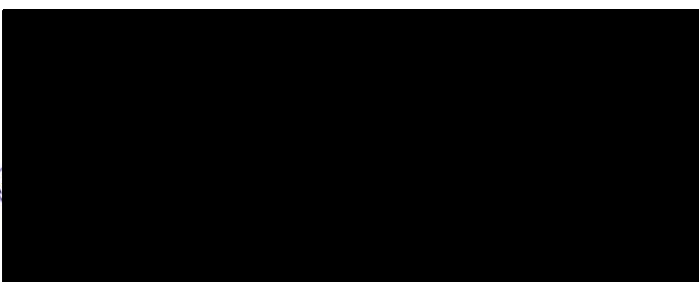
**3. PART 6 – DECOMMISSIONING OF STORAGE SYSTEMS**

We note that the provision for *temporary decommissioning of storage systems* has been removed from the draft regulations. If the current regulations permitting temporary decommissioning for a period of up to 12 months are significantly varied (r.25(2) commencement of decommissioning within 2 months and completion within 6 months) there are significant commercial implications for site owners. For example, in the event an operator is unable to continue trading and wishes to sell, unless this is concluded within a 2 month timeframe, the operator would be required to commence decommissioning a potentially sound UPSS.

Similarly, changes in demand may require a sound tank to be put out of service for a period of time and the proposed 2 month timeframe for commencement of decommissioning provides insufficient time for decision making.

We thank you for this opportunity to provide feedback and would welcome further discussions when your review of submissions is complete.

Yours sincerely



**SARAH INCE  
CONTRACT & OPERATIONAL COMPLIANCE MANAGER  
ON BEHALF OF CALTAS PTY LTD**