

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of application CRC190445 by the Christchurch City Council for a comprehensive resource consent to discharge stormwater from within the Christchurch City area and Banks Peninsula settlements on or into land, into water and into coastal environments

EVIDENCE SUMMARY OF TRENT SUNICH ON BEHALF OF Z ENERGY LIMITED, BP OIL NZ LIMITED, AND MOBIL OIL NZ LIMITED (*THE OIL COMPANIES*)

1. INTRODUCTION

1.1 My name is Trent Sunich and I provided technical evidence on behalf of the Oil Companies. I provide below a summary of the key points of my evidence and briefly address key matters arising from rebuttal evidence provided on behalf of the Applicant.

2. SUMMARY OF EVIDENCE

2.1 My evidence in chief has highlighted how the Oil Companies are managing their sites through the implementation of a guideline document prepared in conjunction with the Ministry for the Environment which assists with site design, spill containment and treatment design for stormwater runoff from areas of the site where handling of fuels take place. The Guideline¹ is applicable to retail fuel outlets and bulk fuel handling facilities and has been embedded in site practice throughout New Zealand, including Oil Company sites within Christchurch City.

2.2 In my opinion Oil Company sites compliant with the guideline are demonstrating best practice relative to the risk of stormwater contamination and should not be excluded from being authorised by the CSNDC as may be the case through the enforcement of draft Condition 2.

2.3 Mr Laurenson and I have discussed this matter with Ms West and Mr Norton and it was generally agreed that MfE guideline compliant sites would be unlikely to pose an 'unacceptably high risk to surface water or groundwater contamination' as is purported by Condition 2. Notwithstanding this general acknowledgement, uncertainty remains for the Oil Companies given the blanket approach to regulating industrial site stormwater discharges and implementation of the yet to be developed risk matrix (draft condition 3(c)). Given industry specific consent conditions are not preferred by the applicant², I consider that the development and implementation of the risk matrix should be as soon as practicable including engagement with the respective industry sectors.

¹ The Environmental Guidelines for Water Discharges from Petroleum Industry Sites in New Zealand (1998)

² Statement of Rebuttal Evidence, Robert Brian Norton, paragraph 27

- 2.4** I have reviewed the rebuttal evidence of Mr Norton and agree the Guideline does not specifically seek to manage areas of petroleum industry sites (e.g. retail fuel outlets, bulk fuel storage terminals) where fuel transfer activities are not taking place. This is typically trafficked areas where vehicle manoeuvring or parking takes place and is particularly relevant for retail fuel outlets given the volume of vehicle movements.
- 2.5** In this regard, the Oil Companies have sought to characterise stormwater discharge quality from their retail fuel outlets and was reported by URS New Zealand Limited³ in 2008. This study analysed stormwater quality discharging from fuel transfer areas (managed with Guideline compliant stormwater systems), non-fuelling areas and for comparative purposes, a commercial car park. The results of this study were also discussed with Ms West and Mr Norton.
- 2.6** In summary the report concluded stormwater discharges from non-forecourt areas are similar to concentrations in stormwater discharged from public car parks and are also in range indicated by Mr Norton in his evidence in chief⁴ for total suspended solids (TSS), copper and zinc.
- 2.7** I understand stormwater discharges with these contaminant characteristics will be managed through the implementation of the Stormwater Management Plans (SMP) focusing on land use types (e.g. business zoned land) or through meeting the definition of a 'high use site' and implementation via Schedule 3 of the draft conditions. In both cases, site redevelopment appears to be a trigger for the installation of first flush stormwater runoff treatment. I support the certainty provided by these requirements and aligns with my view that typical best management stormwater practices such as those listed in Table 3 of the Avon SMP (e.g. proprietary treatment devices) will contribute to the receiving environment outcomes sought by the CSNDC. This also serves to alleviate the concern raised in my evidence in chief regarding undefined water quality treatment targets and water quality treatment device responses to meeting those targets.

³ Stormwater and Sediment Monitoring Data from Service Stations and Control Sites in the Auckland Region

⁴ Statement of Evidence, Robert Brian Norton, Table 6-2.

- 2.8** I have reviewed the rebuttal evidence of Mr Tipper which responds to my evidence in chief. In this regard I clarify that the Guideline document seeks only to manage operational phase stormwater runoff from petroleum hydrocarbon sites and it is not intended for the water quality objectives listed in that document to be compared to sediment laden water from construction sites.
- 2.9** Regarding the imposition of TSS limits for construction phase stormwater runoff, I remain of the view that implementation of best practice is a more appropriate means to remove sediment from the water column via erosion and sediment control method-based practices such as those listed in the Erosion and Sediment Control Toolbox for Canterbury.

Trent Sunich
13 November 2018