



Canadian  
Petroleum  
Products  
Institute

Institut  
canadien  
des produits  
pétroliers

## **THE CANADIAN PETROLEUM PRODUCTS INSTITUTE (CPPI)**

### **POSITION ON THE QUALITY OF DISCHARGES TO MUNICIPAL SEWER SYSTEMS FROM PETROLEUM MARKETING FACILITIES**

#### **BACKGROUND**

Sewer use by-laws are being developed or revised in terms of discharge limits and in some cases pollution prevention planning in many jurisdictions across Canada for facilities discharging to sanitary, storm or combined sewers. Some of the public policy drivers for the development of these by-laws include: preventing shock loading to sewage treatment plants (STPs), producing acceptable bio-solids, protecting sewers and STPs from corrosion, protecting workers' health and protecting aquatic life.

Due to the nature and large number of CPPI member company facilities across Canada, the variety of sewer use by-laws and different requirements by each municipality are creating a "regulatory challenge" for our industry. The by-laws could potentially impact over 1,500 car wash operations, 2,000 service bays, 7,000 gas bars, 750 card/key lock outlets and 1000 bulk fuel outlets. These facilities are owned and/or operated by CPPI member companies or are independently owned facilities branded by CPPI member companies.

#### **CPPI POSITION**

CPPI has produced a set of Best Management Practices (BMPs) which we believe will effectively and practically provide a consistent method of controlling discharge quality and quantity from our car washes and service bays and all other fuel related facilities. CPPI member companies are committed to implementing these BMPs at all their operations across Canada and will work with municipalities to determine if the BMPs can be incorporated into their sewer use by-laws. Once incorporated, municipalities can audit our facilities against the BMPs.

## **CPPI PRINCIPLES FOR DEVELOPING MUNICIPAL SEWER USE BY-LAWS**

- **Level Playing Field**

Many facilities are impacted by the by-laws including non-CPPI competitors, vehicle dealerships, engine repair shops, radiator repair shops, non-petroleum car washes, etc. CPPI members are committed to operate within the principles of the BMPs as a means of complying with all by-laws and will seek a “level playing field” to ensure that the requirements and intentions of the by-laws are applied equally to **all** facilities.

- **Effective Consultation**

CPPI advocates consultation at an early stage of public policy development to make sure that the policy is practical and in line with the overall objective of protecting human health and the environment.

- **Consistency Among Jurisdictions**

Since CPPI members operate facilities across Canada, a high level of consistency of by-law requirements is very important. In most cases, the management systems in place at petroleum marketing facilities are set by company head offices and are consistent throughout the organization. We find the BMP approach the only feasible means of attaining this consistency.

- **Achievable Effluent Criteria**

The effluent criteria that has been specified in some by-laws is not achievable in practical terms (e.g. some parameters are set at levels more stringent than drinking water standards). CPPI firmly believes that implementation of BMPs at our facilities will result in the best effluent quality and makes the imposition of effluent criteria unwarranted. However, if some municipal jurisdictions believe effluent criteria should be set for our facilities, CPPI would like to work with them to ensure the by-laws contain achievable, scientifically-based criteria which, at the same time, protect human health and the environment.

***\*The members of CPPI are committed to and place a strong emphasis on health, safety and environmental protection. For more information, please visit our website at [www.cppei.ca](http://www.cppei.ca).***