



Trade
effluent
policy.

Version 3.2

Publish Date: 8 October 2018

Effective from: 8 October 2018

Internal: Company and partners

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1. Background

Trade effluent can be best described as anything other than domestic sewage (toilet, bath or sink waste) or uncontaminated surface water and roof drainage (rainwater). It is a legal requirement under the Water Industry Act 1991 to gain consent from TWUL Wholesale (us) before discharging trade effluent into the public sewer. We have the powers to:

- apply conditions to consents
- grant consents for discharges
- enforce consent conditions
- charge for trade effluent services.

2. Scope

This policy sets out the rules regarding the provision of trade effluent services by us to retailers and non-household customers, which will be implemented by the TWUL Wholesale and our partners.

3. Definition of terms

Consent register – a directory of copies of full trade effluent consents, which is available on our Website

Notice of direction - means a legal document issued to vary the terms of a trade effluent consent

MCERTS – the Environment Agency’s Monitoring Certification Scheme used to approve instruments, people and laboratories.

Operational area – the geographical area, where sewerage services are provided by us and where we are the undertaker for the sewerage network

Operational parameters – means settleable solids (St), settled chemical oxygen demand (COD) (Ot) and ammonical nitrogen (At) used to calculate charges, which are provided to the market operator.

Private meters - means assets not owned by us which are used to measure flow related to the calculation of trade effluent charges.

Sample – means the collection of discharges and analysis which is carried out in an accredited laboratory.

Sampling survey – a series of samples taken by us to determine the charging method and /or the operational parameters.

Settled Chemical Oxygen Demand (COD) (Ot) - means the chemical oxygen demand of the trade effluent (in milligrams per litre) after one hour quiescent settlement or such other parameter as may be determined by Thames Water.

Settleable solids (St) - the total settleable solids, settleable in 1 hour from the trade effluent at pH 7.0 or at pH of mixed sewage (in milligrams per litre)

Sewerage system – means the receiving sewer, pumping station and sewage treatment works

Special category effluent – a type of trade effluent defined in the Water Industry Act 1991 where the sewerage undertaker has a duty to refer trade effluent discharges of this nature to the Environment Agency.

Trade effluent - any liquid, either with or without particles of matter in suspension in the liquid, which is wholly or partly produced in the course of any trade or industry carried on at trade premises; and in relation to any trade premises, means any such liquid which is so produced in the course of any trade or industry carried on at those premises, but does not include domestic sewage.

Trade effluent consent – means a legal document issued to grant permission for the discharge of trade effluent.

UKAS – (United Kingdom Accreditation Service) the national accreditation body recognised by the British government UKAS is appointed as the national accreditation body by Accreditation Regulations 2009 (SI No 3155/2009) and the EU Regulation (EC) 765/2008. UKAS operates under a memorandum of understanding with the government, through the Secretary of State for Department for Business, Energy & Industrial Strategy.

4.Principles

We are committed to:

1. ensuring the fair and accurate calculation of our trade effluent charges
2. protecting the health and safety of our employees and the public, the environment and the public sewerage network through the control of trade effluent discharges
3. meeting our statutory and regulatory obligations relating to the control and treatment of trade effluent
4. acting in accordance with all applicable legislation and our corporate policies.

5.Policy

a. Effluent

- We will not accept trade effluent delivered to our sewerage treatment works using tankers.

b. Applications

- We will reject applications which are not sufficiently complete to enable us to progress the application and in these cases the application must be re-submitted together with the required information to restart the process.
- If we identify material inaccuracies in the information provided in the application we will tell the retailer and the non-household customer and may ask for the application to be resubmitted.
- We will contact the non-household customer directly if the retailer does not respond to our request for additional information within 5 business days or timescales agreed with us.
- We will reject any application where additional information requested has not been provided in 5 business days or within a timescale agreed with us.
- Applications for consents must be signed by the non-household customer and any applications that have not been signed by the retailer and physically signed (written signature) by the non-household customer will be considered incomplete.
- We do not offer temporary/short term multi site consents, due to the variation in the nature and composition of discharges from each premises.

c. Requesting a consent

- We will accept applications for trade effluent consents (consents) by retailers on behalf of their non-household customers when the retailer has a valid contract with us and is the wastewater retailer registered to the supply point.

- We will accept applications from non-household customers who would like permission to discharge trade effluent into a public sewer within our operational area.
- Applications should be submitted at least two months in advance of the date when the non-household customer would like to start discharging trade effluent.
- A retailer must be appointed where an application is submitted for all consents.
- If the appointed retailer does not have a valid contract with us, the application will be rejected.
- Where required to do so, we will refer applications to the Environment Agency.
- We will provide the non-household customer and their retailer with a non-binding indicative decision on the application within 30 business days if we have not already told them of our decision.
- Our decision to grant a consent and what conditions apply will be based on the outcome of any referral, our risk assessment and in accordance with our procedures.
- The decision to grant a consent will be at our discretion.
- Where a consent can be granted we will issue one of the following types of consent:
 - low volume consent - For discharges considered to be low risk and low volume (typically less than 1m³ per day) and valid for a maximum of 12 months from the date of issue
 - short term discharge consent – Valid for a maximum period of 6 months from the date of issue
 - full trade effluent consent – For all other trade effluent discharges not covered by above.
- We will issue one consent for each discharge point.
- All full trade effluent consents will be published on our consent register.
- We will register low volume consents with the market operator.
- We will not register short term consents with the market operator.
- Where trade effluent is discharged into a public sewer within our operational area but the effluent is treated by another wholesaler, we will accept applications for the consent and where appropriate notify the other wholesaler that a consent has been granted. We will register the consent with the market operator.
- We will only issue consents, where the discharge is made to the public sewer.
- Consents cannot be transferred to a new owner or occupier of the eligible premises. New owners or occupiers of the eligible premises who would like permission to discharge trade effluent must apply for a consent.

d. Consent variation

- We will accept requests to vary a consent from:
 - retailers who have valid contract with us,
 - non-household customers with an existing trade effluent consent
 - the Environment Agency.
- We will not accept requests to vary the terms of short term consents or low volume consents. Customers must submit a new trade effluent consent application.
- Applications to vary a consent must be signed by the non-household customer.
- We will vary the terms of a full trade effluent consent, where we consider it necessary to do so.
- The decision to vary the terms of a full trade effluent consent will be at our discretion.
- Variations to a full trade effluent consent will be confirmed by issuing a notice of direction.
- Where we issue a variation, where necessary, we will review the trade effluent charges and the assessment method for calculating trade effluent charges.
- We will update the consent register when a variation is issued.
- Where necessary we will notify any appropriate body or agency, such as the Environment Agency of the variation.

e. Discontinuation

- We will not discontinue trade effluent consents.
- If a non-household customer temporarily stops discharging trade effluent their retailer may request a charges reassessment.

f. Consent termination

- We will accept requests to terminate a consent from retailers who have valid contract with us and non-household customers with an existing consent.
- We will remove terminated full trade effluent consents from the consent register.
- Where necessary we will notify any appropriate body or agency, such as the Environment Agency that the consent has been terminated.

g. Sewerage modelling

- When assessing application we may identify that sewerage modelling needs to be carried out eg to determine whether the sewer system can accept the volume of discharge. We will advise the customer if this is required and any applicable charges.
- If the customer does not want sewerage modelling to be completed we will either reject their application and advise them accordingly or tell them what discharge we can accept.

h. Visits to eligible premises

- It is the responsibility of the non-household customer to ensure the health and safety of our staff visiting their premises.
- We will carry out visits to eligible premises to monitor compliance with consent conditions, sample points and operational parameters.
- From time to time we may need to make unannounced visits to customer premises to deal with specific trade effluent related matters and incidents.
- Visits to eligible premises to investigate suspected non-compliance and to respond to incidents, we may carry out visits at any time and without prior notice.
- The frequency of site visits will be determined based on the nature, composition, and volume of the discharge and the non-household customer's compliance record with the trade effluent consent.
- Where we consider it appropriate to do so, we will make arrangements for automated sampling or monitoring and for recording data remotely.
- Site visits to assess applications will be carried out Monday to Friday between 9am-5pm (excluding bank holidays and public holidays)
- Where an appointment is necessary it will be arranged Monday to Friday between 9am-5pm (excluding bank holidays and public holidays)
- Where we arrange a site visit either with the retailer or the non-household customer, where appropriate we will provide details of what information your non-household customer will need to provide when we carry out the site visit.
- We may carry out monitoring visits at any time, without warning for example to investigate potential illegal discharges.

i. Sampling and analysis by non-household customers

- Non-household customers who would like to make their own arrangements for sample collection and analysis of samples used for billing must seek permission from us prior to doing so.
- It is the responsibility of the non-household customer to demonstrate their ability to have the effluent samples collected and analysed to our requirements.
- Non-household customers must:

- demonstrate the ability to collect and analyse samples to our requirements including refrigeration, storage of samples, bottles used, equipment etc. This may involve us carrying out a site visit
- ensure sampling procedures are to MCERTS or equivalent standards
- have the samples analysed to UKAS accredited laboratory standards for the required operational parameters
- initially be sampled by us until bi-partite samples show the results are comparable to ours over a period of three to six months
- allow us to undertake an audit upon request
- provide sample results on demand in the manner specified, within the specified timeframe and frequency
- analyse the samples for chemical oxygen demand (Ot), settleable solids (St) and if appropriate, ammoniacal nitrogen (At) and other determinands required.
- We may carry out audits of sampling methods and analytical results at any time.
- We will undertake an annual review of how frequently sampling must be carried out.
- If the non-household customer fails to adhere to the approved sampling and analysis method or fails to provide sample results within the required timeframe our permission to carry out sampling and analysis will be revoked.

j. Sample results

- We will provide retailers with the results of any billing sample analysis within one (1) business day of the sample analysis being fully completed and the sample results being available to us.
- We will provide on request both monitoring and billing sample results to non-household customers within one (1) business day of the sample analysis being fully completed and the results being available to us.

k. Private meters

- We will make customers aware of our requirements in relation to the maintenance of private meters and the maintenance and provision of private meter information.
- We may carry out audits of private meter data and carry out site visits to check the accuracy of private meter data at any time.
- We may carry out site visits to inspect private meters at any time.
- Retailers must notify us when they become aware that a private meter is faulty or may not be recording consumption accurately.
- Private meters must be kept in good working order and be maintained and calibrated in line with the manufacturer's guidelines.

l. Operational parameters calculation methods

- Where a consent is granted we will carry out a billing assessment to determine the method by which trade effluent operational parameters per cubic meter will be calculated.
- The operational parameters will be calculated using one of the following methods:
 1. sampled billing - using the test results of trade effluent discharge samples, known as billing samples, taken on a regular basis by us or the non-household customer
 2. banded billing - allocating the discharge to specific bands, based on the strength of the trade effluent discharge, commonly called a banded billing case
 3. standard strength – a predefined effluent strength associated with particular types of discharges eg launderette

Trade effluent operational parameters calculation method criteria:

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- sampled billing (1) where the effluent is highly variable or the volume of discharge is 400 cubic meters per day or greater or contains ammonia at a concentration above 35 mg/l; or
- banded billing (2) where the effluent is not highly variable; or
- standard strength (3) where a category detailed below can be identified.

m. Standard strength

- A pre-defined strength can be used for discharges that fall into one of the following categories:
 - launderettes
 - car washes
 - commercial swimming pools
 - dry cleaners
 - small/micro-breweries
 - concrete contaminated sites (batching plants, wheel washes on construction sites)
 - laboratory glassware washing
 - bus washes
 - train washes
 - contaminated surface water at waste transfer sites
 - contaminated surface water from gasholders.

n. Billing samples

- Where regular sampling is required to calculate the trade effluent charges we will calculate the number of samples that need to be taken each year using a statistical formula.
- We will take a minimum of 24 samples per year.
- The results of samples taken to calculate trade effluent charges will also be used to monitor compliance with the conditions of the consent.

o. Banding

- Where necessary we will carry out a sample survey to identify the strength ((settleable solids (St) and settled chemical oxygen demand (COD) (Ot)) of the effluent.
- We will use the averages of the results from the sample survey to determine the strength ((settleable solids (St) and settled chemical oxygen demand (COD) (Ot)) of the effluent.

p. Charges reassessment

- We will accept requests to review the operational parameters or volumetric calculations used to calculate trade effluent charges from retailers who have a valid contract.
- In order to undertake an effective reassessment, the retailer and their non-household customer must provide all additional information required by us.
- Supporting evidence may be required.
- We may undertake an annual review of the last 12 months discharge volumes and make any necessary changes to ensure the appropriate tariff is used.

q. Invoicing

- We will invoice the non-household customer's retailer for any applicable charges.

r. Enquiries and complaints

- Where a 3rd party or consultant is acting on behalf of a non-household customer, we require written permission from the non-household customer to share information with the consultant.
- Where a retailer is acting on behalf of their non-household customer in relation to disputes, non-compliance and enforcement actions, we require written permission from the non-household customer to share information with the retailer.
- We will respond to complaints regarding billing from non-household customers where we have issued the invoice to the non-household customer.
- Non-household customers must contact their retailer for any billing-related enquiries where charges are paid to the retailer and/or the retailer has issued an invoice.
- Appeals which relate to sections 122 and 126 of the Water Industry Act 1991 will be regarded as complaints.

s. Restriction on disclosure of information

- In accordance with section 206 of the Water Industry Act, we will not provide retailers with information regarding non-household customers compliance with their trade effluent consent.

6.Changes to policy

This policy will be reviewed annually and updated periodically as required.

7.References

- Water Industry Act 1991
- Wholesale Contract/Wholesale – Retail Code
- Wholesale Service Offering
- Wholesale Tariff Document

8.Appendices

There are no appendices to this document.