

Trade Waste

Information Booklet

**Everything you need to know about
South East Water's trade waste requirements.**



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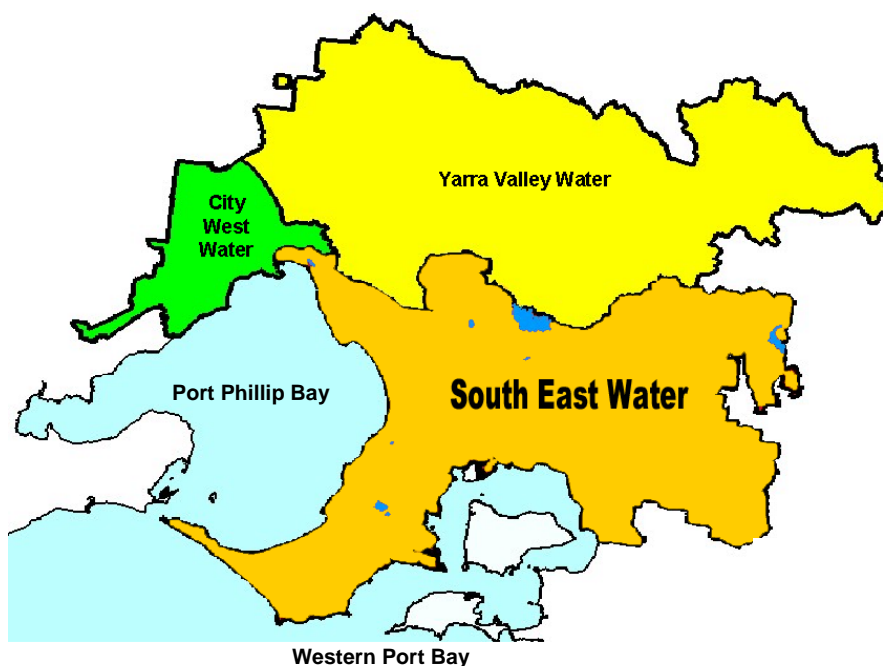
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This document aims to explain and clarify the systems and procedures that South East Water Limited use to manage trade waste discharges to the sewer.

South East Water

South East Water Limited is a state-owned company providing water and sewerage services to approximately 560,000 properties in the southeast suburbs of Melbourne and surrounding areas. The region covered by South East Water is shown in the map below. Last year we delivered 170,000 megalitres of water to our customers and collected approximately 113,000 megalitres of wastewater (sewage).

Area Map – Melbourne’s Water Companies



Operating as a water retailer, we purchase bulk water and sewage treatment from water wholesaler, Melbourne Water, and compete by comparison with two other companies operating in the metropolitan area. Approximately 10% of the total sewage we collect is treated at our ten local sewage treatment plants.

What is Trade Waste?

Trade Waste is any wastewater discharged from commercial, industrial, laboratory or trade activities, specifically excluding any wastewater discharged from private residential premises. South East Water is empowered to manage trade waste by the *Water Industry Act 1994* and the *Water Industry Regulations 1995*, in accord with conditions in its *Water and Sewerage Licence*.

The role of the Trade Waste Branch at South East Water is to provide a commercially viable and customer focused trade waste receival service while not accepting waste that is reasonably likely to:

- Endanger Human Life
- Compromise the Safety of Personal
- Compromise sewerage works; or
- Significantly adversely affect the operations of a sewage treatment plant or any part of the environment

South East Water implements its trade waste role by:

- Ensuring all discharges of trade waste have an appropriate Agreement / Consent;
- Charging for receivable trade waste based on volumes and quality;
- Monitoring compliance with conditions of each Agreement / Consent; and
- Following up any non-compliance.

In addition, South East Water requires its high-risk trade waste customers to prepare and submit Waste Management Plans and Risk Profiles.

The following requirements need to be met by both South East Water and the customer before trade waste discharges can be accepted to sewer:

- Formation of a Trade Waste Agreement;
- Payment of Trade Waste Application Fees;
- Any or all Plumbing Applications submitted (if required).



An example of a Commercial Trade Waste business.

Agreement Formation

All Trade Waste customers require a Trade Waste Agreement or Consent prior to any discharge commencing. This is required by law and is necessary in order to effectively manage the risks associated with the trade waste. The Agreement is essentially a performance contract between the customer and South East Water.

There are essentially six types of Trade Waste Agreements:

Industrial Trade Waste Agreement: Issued to all Industrial Trade Waste customers that produce trade waste effluent that is considered a medium to high risk. The Trade Waste Agreement requires signatures of both South East Water and the customer. This document covers all legal and regulatory requirements of both parties, including the parameter limits for discharge of trade waste effluent, the designated sample sites and trade waste pre-treatment requirements. The Agreement may also include specified maintenance and servicing of pre-treatment equipment and requirements for the customer to take and submit self-monitoring results of trade waste samples analysed by an independent NATA registered laboratory.

Industrial Trade Waste Consent: This document is provided to Industrial Trade Waste customers that are considered low in risk. This document is similar in all respects to an Industrial Trade Waste Agreement, but it does not require a signature from the customer. It is issued to the customer after a Trade Waste Application has been made, and is effective from the date of Consent commencement.

Commercial Trade Waste Consent: This document is brief and specifically directed to cover the discharges of trade waste effluent from commercial food premises such as Restaurants, Café's, Bakeries, Take Away Food Outlets, Butchers, etc. A Commercial Trade Waste Consent is primarily targeted to manage the risks associated with the disposal of greasy food waste into the sewer. It covers the legal and regulatory requirements of both the customer and South East Water, and specifies the customer's requirement to have appropriately sized pre-treatment equipment - such as a grease interceptor - to capture and retain Oil and Grease. The Consent also states the frequency that South East Water requires pre-treatment equipment to be cleaned and maintained. Only EPA - licensed waste transporters, who can dispose of the waste appropriately, can carry out the cleaning. This document doesn't require a signature from the customer.

Food Waste Agreement: This document is designed specifically for customers who dispose food waste to sewer via food disposal units, and potato and vegetable peelers. It is very brief and covers the conditions of acceptance of the waste to sewer and the method of disposal to sewer, such as specifying the size of the unit and, in the case of Hospitals and Nursing Homes - the number of people catered for.

Tankered Waste Agreement: A Tankered Waste Agreement allows EPA - licensed waste transporters to cart and dispose of waste from septic tanks to specified sewage dumping points, at specified times. This is the only Agreement document that is established with a customer without reference to a property location. In this circumstance, the property location and asset belongs to South East Water. The Agreement specifies the conditions that the waste transporters must meet for South East Water to accept the waste at its dumping points.

Emergency Trade Waste Agreement: There are circumstances when a special one - off Trade Waste Discharge Agreement may be issued to a customer for a limited period of time. For instance these limited discharge Agreements may be required when a site or property is under construction and the trade waste effluent is only produced for a limited period of time.

All Trade Waste Agreements vary in their duration, some last for the period that a trade waste effluent will be discharged, and others range from 12 months to 5 years or more depending upon the industry type, trade waste generating activities, customer history and the trade waste volumes and quality.

What is required to create a Trade Waste Agreement?

Trade Waste Agreements or Consents are available via application to South East Water. Applications for a Trade Waste Agreement or Consent can be obtained directly from South East Water (20 Corporate Drive Moorabbin), the South East Water Internet site (www.southeastwater.com.au), by phone (03 9552 3662), or by fax (03 9552 3673) for your convenience.

When an application is received with all required documentation, the application is reviewed and assessed according to set criteria and then the appropriate document (Agreement / Consent) is returned to the customer. There is an Application Guide to assist with completing the Trade Waste Application, and staff from the Trade Waste Branch are available to assist customers with any questions.

When submitting a Trade Waste Application, the customer is required to include a Site Plan of the property where trade waste will be generated and discharged. The site plan is required to be no larger than A3 and should display the location of the building(s) on the site, the location of trade waste generating activities and any pre-treatment equipment. Site Plans should also display the location of the trade waste connection to sewer and a trade waste sampling point.

Where there is a requirement for trade waste pre-treatment equipment, a drawing of this equipment is also required. The Trade Waste Branch refers to these as Trade Waste Treatment Apparatus drawings.

In circumstances where chemical products are present in a trade waste effluent - such as caustic or chlorine from cleaning, or acids and alkalis from neutralisation - Material Safety Data Sheets (MSDS) are required to be submitted for each chemical with the Trade Waste Application.

Variations

There are circumstances when a discharge is unable to comply with one or more of the limits in the customer's Trade Waste Agreement. If this discharge cannot be made compliant, through the use of appropriate pre-treatment technology and implementing relevant cleaner production practices, then South East Water may consider issuing a variation for that / those limit(s). The customer is required to submit a detailed letter applying for a variation, specifying the actual limits required determined through a sampling program, as well as how the limits were derived and what has been done to try and reduce the actual discharge level. Charges may apply to the variation application. South East Water must be confident that a variation will not affect human health, infrastructure integrity, treatment plant operation or the environment before considering a variation request. If the customer discharges in the sewer catchments of either Eastern Treatment Plant or Western Treatment Plant, then South East Water must seek approval of Melbourne Water for a variation.

What is Risk Ranking?

South East Water manages the risks associated with accepting trade waste effluent by assigning all Trade Waste customers a Risk Ranking based on their business activities, trade waste volume and quality, their history and their location in relation to proximity to a sewage treatment plant. A logarithm calculates the Risk Rank, which ranges from 1 to 5. Risk Rank 1 customers pose the highest risk and Risk Rank 5 customers the least. The Risk Ranking determines the frequency of Site Inspections and Self Monitoring, as shown on the table below.

<u>Risk Ranking</u>	<u>Freq. of Site Inspections</u>	<u>Freq. of Self Monitoring</u>
1 - Extreme	4 Weekly	4 Weekly
2 - High	9 Weekly	9 Weekly
3 - Moderate	13 Weekly	13 Weekly
4 - Low	26 Weekly	Generally not required
5 – Very Low	As required	Not required

What can I expect from a Site Inspection?

Site inspections are carried out regularly, and the Trade Waste Officer will take a sample of the trade waste effluent if there is a discharge to sewer. All samples taken by South East Water during a site inspection are stored and handled according to strict standards and sent to an independent laboratory for analysis. Maintenance records are viewed for the cleaning and pump out of Trade Waste Treatment Apparatus, and all conditions of the Trade Waste Agreement are checked to confirm that they are being met. Site inspections also provide an opportunity for South East Water and the customer to discuss any trade waste issues, such as waste management and cleaner production.

What are Trade Waste Standards?

Industrial Trade Waste Agreements and Consents have a Schedule of Standards for trade waste discharged to the sewerage system. This schedule outlines all the chemical parameter limits that can be accepted into the sewage system, and is available from South East Water if requested.

Trade Waste Charges

Trade Waste charges are approved by the Essential Services Commission to cover the actual costs of the administration, transfer, treatment and disposal of Trade Waste. The broad classifications of Trade Waste charges are:

One-off Charges

- Trade Waste Application Fee

On-going Charges

- Trade Waste Agreement Charge
 - Volumetric and Quality Charges
 - Food Waste Charges
- **The Trade Waste Application Fee** covers the cost of processing the Trade Waste Application, and is charged on a sliding scale, based on the specified maximum daily discharge volume.
 - **The Trade Waste Agreement Charge** covers the costs associated with administering and monitoring Trade Waste Agreements, and is charged on a sliding scale depending on the maximum volume discharged to sewer per year.
 - **Volumetric and Quality charges** cover the cost of transporting and treating the trade waste, and are applied to customers when they meet one or more of the following conditions:
 - Volume greater than 1,000 kL/year;
 - Concentration of Biochemical Oxygen Demand greater than 600 mg/L;
 - Concentration of Suspended Solids greater than 600 mg/L.

* kL/year = Kilolitres per year

*¹ mg/L = Milligrams per litre

- **Food Waste Charges** are applied to the discharge of food waste to sewer through a food waste disposal unit, or potato peeler without a peel interceptor. Annual charges vary depending on the wattage of the food waste unit or potato peeler, or the number of beds serviced by the units in a Hospital or Nursing Home.

Trade Waste fees and charges do not cover Trade Waste Apparatus installation and maintenance or the charges applied by laboratories for self-monitoring sample analysis.

Trade Waste fees and charges are billed quarterly on a separate account.

A Trade Waste Charges Brochure is available from South East Water to further explain and clarify all aspects of trade waste charges.

Monitoring of Agreements

The reason for monitoring Trade Waste sites is to ensure customers comply with the conditions set out in their Trade Waste Agreement. The frequency that a site is monitored is dependent upon the customers Risk Ranking. A higher ranking = more frequent monitoring.

There are several methods used by South East Water to monitor Trade Waste Agreements:

Site Inspections – A South East Water Trade Waste Officer carries out these inspections; Risk Rank and other site-specific circumstances determine the frequency.

Sampling – A sample of trade waste is always taken during site inspections when there is a discharge to sewer. Sampling can also be arranged between the Trade Waste Officer and Customer for batch discharges and follow up sampling.

Self-Monitoring – Depending on the Risk Rank of the customer and occasionally due to specific site issues the customer can be required to submit trade waste sample results to South East Water. This requirement is a Trade Waste Agreement condition and is called self-monitoring. The sample parameters are outlined in the Agreement, along with the sample type and frequency. An independent NATA registered laboratory must carry out all sample analysis.

Wastelog – A system developed to monitor and enforce the progressive pump outs of Grease Interceptors at Commercial Trade Waste premises, which have resulted in a reduction of sewer blockages caused by fats and grease. Wastelog will be extended to cover some Industrial Trade Waste customers.

Water meter readings – Some Trade Waste customers have water meters on their trade waste effluent discharge to sewer. This type of monitoring assists when calculating the customers trade waste charges.

Non-Compliance

Occasionally a Trade Waste customer may fail to comply with one or more of the conditions set out in their Trade Waste Agreement. In these circumstances, South East Water has the ability under the *Water Industry Act* and *Water Industry Regulations* to issue a Notice of Non-Compliance to the customer. South East Water uses a three-stage Non-Compliance process.

Stage 1 – Initial Trade Waste Notice

As soon as possible after the non-compliance is detected, a Trade Waste Officer will issue an Initial Trade Waste Notice. The notice usually sets out:

- What the sample was and when it was taken;
- How the sample failed to comply;
- That the problem needs to be rectified within a specified period of time;
- That the reasons for the breach and the steps taken to rectify the problem are explained in writing along with an assurance that all reasonable actions have been taken to ensure the breach will not occur again.

South East Water then continues to take and analyse samples of trade waste effluent to confirm that it is compliant. If the samples comply with the Trade Waste Agreement, no further action will be taken.

Stage 2 – Formal Letter of Non-Compliance

If the customer does not comply with the conditions of the Initial Trade Waste Notice, South East Water will issue a Formal Letter of Non-Compliance, which requires the customer to:

- Review the trade waste treatment process;
- Attend a meeting with South East Water's Officers to discuss reasons for the breach and action taken or proposed to prevent a recurrence of the Non-Compliance; and
- Meet South East Water's costs in ensuring that trade waste effluent complies with the Trade Waste Agreement.

South East Water will take and analyse Priority Samples of the trade waste effluent. If Priority Samples, usually taken 28 days after the letter, all comply with the Trade Waste Agreement, the customer is notified and no further action will be taken.

Stage 3 – Notice of Breach

If any Priority Sample does not comply, South East Water will issue a Notice of Breach, setting out a date by which trade waste effluent must comply with the Trade Waste Agreement.

If a sample taken after that date shows that the trade waste effluent complies, no further action will be taken.

If samples are taken that do not comply, South East Water will terminate the customers Agreement. The customer must then cease discharging trade waste effluent to South East Water's sewer immediately and the trade waste connection point may be sealed. Any further discharge of trade waste effluent will be liable for an initial fine, and additional fines for each day that trade waste effluent continues to be discharged.

Before any further trade waste effluent can be discharged, a new Trade Waste Agreement must be signed, and the customer must prove that compliance with all conditions is achievable.

What are my roles and responsibilities as a Trade Waste customer at South East Water?

As a Trade Waste customer, it is necessary to take all appropriate actions to ensure compliance with the Trade Waste Agreement at all times.

Compliance means different things to different customers; the requirements and conditions of Trade Waste Agreements vary depending on the assessed risk of the trade waste effluent. However, some things that are the same for all customers are that:

- Trade waste effluent discharged to sewer must always comply with the chemical parameter limits in the Trade Waste Agreement;
- The customer must provide South East Water with all information relevant to Agreement non-compliance as soon as possible;
- The customer must keep South East Water informed of any changes to business activities and personnel relevant to trade waste;
- All trade waste pre-treatment equipment (Trade Waste Apparatus) is routinely maintained and cleaned. e.g. Grease Interceptor pumpouts;
- EPA dockets are provided as evidence of the legal disposal of prescribed waste (e.g. sludges and grease in Grease Interceptors, solids in Settling Tanks and solvents in Solvent and Oil Interceptors) by waste transport companies;
- The customer pays all Trade Waste fees and charges;
- The customer must take immediate action to resolve any non-compliance.

Other requirements may include:

- Sampling of trade waste effluent as part of Self Monitoring or special programs;
- Developing and implementing Waste Management Plans;
- Designing Risk Profile Plans;
- Submitting water / check meter readings to South East Water;
- Submitting sample results to South East Water;
- Only using Fire Services for fighting fires;
- Not allowing open areas such as car parks and loading or wash bays to discharge to the sewer unless approved by South East Water.

Dispute resolution

Occasionally a dispute may arise between South East Water and a customer regarding the discharge of trade waste effluent to the sewage system. In such cases South East Water has a complaints escalation procedure that aims to obtain a satisfactory outcome for both parties and ensures that in cases where a dispute arises they are thoroughly and properly investigated. Any final decision with regards to a dispute always accounts for the rights and obligations of both parties. If a customer is still not satisfied with a decision, the matter can be referred to a mutually agreed panel for resolution, or the Energy and Water Ombudsman of Victoria.

Where can I go for extra information?

South East Water's Trade Waste Officers

Trade Waste Brochures:

- Charges
- Commercial Trade Waste
- Trade Waste

Trade Waste Parameter Schedule

Trade Waste Drawings

Trade Waste Variation Guidelines

Trade Waste Application and Application Guide

Visit the South East Water web site at - www.southeastwater.com.au



A typical Batch Tank for the treatment of industrial trade waste effluent generated at a Chemical Blender or Radiator Repair business. After treatment the effluent would be discharged via a Test Sump and or a Disconnect Gully to sewer.

- **South East Water** may update or amend information contained in this Trade Waste Information Booklet and other Trade Waste documents from time to time without notice.
For the most up to date version please refer to our website or contact us in Trade Waste on (03) 9552 3662.