



ENVIRONMENTAL BRIEFING





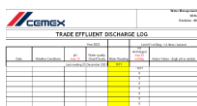
Trade Effluent Discharge Compliance

Background

It is a criminal offence to discharge trade effluent to the foul sewer without consent from the local water company. All conditions and limits in a trade effluent consent are legally binding so failure to comply can result in enforcement action and prosecution. The fines that can result from prosecution are **unlimited** and escalate with the seriousness of the breach. The environmental and financial impacts alone can be serious but there are additional potentially damaging impacts to the business from negative publicity around such a prosecution. There have also been instances where costly repairs to sewer networks are required as a result of non-compliant effluent being discharged. Therefore, **ensuring compliance is vital**.

Many of our operations have trade effluent consents from water companies such as United Utilities, Severn Trent and Thames Water in order to discharge trade effluent including contaminated rainwater, washout water, cooling water or vehicle cleaning effluent. These consents give specific limits for the discharge including maximum effluent volume and flow rate as well as effluent quality e.g. pH and suspended solids limits. All limits in the trade effluent consents must be complied with and evidence retained to demonstrate compliance. Water companies are permitted to take samples of site discharges to check for compliance. These samples, as well as effluent volume records, are required by the water companies for compliance and billing purposes.

Best Practice Compliance Reminders

Discharge and sample points	The discharge must be made into the point as detailed in the consent. A labelled sample point must be available and will ideally only allow a representative sample to be taken when we are discharging to the sewer – i.e., not from settlement pits or tanks and after the pump. We have had water company representatives take samples when we are not discharging, and this can lead to incorrect non-compliant results (with threatened enforcement action). Wherever possible, all samples should be witnessed to ensure that they are taken from the correct place and only when we are naturally discharging.	TRADE EFFLUENT SAMPLING POINT
Volume and Flow Rate	Discharges must not exceed flow rate limits. Discharge volumes must be monitored and recorded and not exceed the maximum stated in the consent for example, per hour or day – this is actual discharge not averaged over several hours/days. If a flow meter is installed this must be operational and calibrated at least annually (record retained). If a flow meter is replaced, records must be retained of replacement date and last reading of the old meter. For automated discharges a system must be in place to ensure compliance with limits.	
pH	Wherever practicable, the pH should be checked before discharging to sewer using pH indicator strips and a record retained. Effluent should not be discharged if the pH is not within the limits in the consent typically between pH6 and 11.	
Suspended solids	Excessive suspended solids must be settled out prior to discharge – through well maintained settlement pits or their equivalent. Discharges direct from stirred tanks are unlikely to comply with the consent limits for suspended solids. If consent limits cannot be complied with then additional treatment facilities must be provided using mobile silt busting equipment for example. Settlement pits / solids traps must be cleared regularly to maintain efficient settlement capacity.	
Fat, oil and grease	An oil – water interceptor may be required. Oil-water interceptors must be maintained and cleared routinely. Where there is no oil - water interceptor, absorbent booms or Seddon polymer pillows can be deployed to ensure that no oil is accidentally released during discharge.	
Monitoring and Recording	We should be routinely sending our own samples for analysis to check for compliance – sample bottles are sent to sites. All on site routine checks for example for pH and build ups in settlement pits should also be recorded. Dates, times and volumes of discharges should be retained. This demonstrates compliance and provides evidence for discussions with the water companies – particularly if we have a difference of opinion.	

Compliance must be maintained even if the discharge is by gravity rather than a pumped discharge. A method to close off any discharge by gravity must be available so that non-compliant effluent can be retained onsite. **If it is not possible to comply with the consent limits, excess water would need to be transferred from site either for use at another site or to a suitably permitted waste facility with all Duty of Care documentation retained.**

Key Points

- It is a criminal offence to discharge trade effluent to the foul sewer without consent from the local water company. All conditions and limits in a trade effluent consent are legally binding so failure to comply can result in enforcement action and prosecution.
- Ensuring compliance and retaining evidence of compliance is vital to avoid environmental impacts, costs, fines and damage to our reputation and ISO 14001 certification which is important for many customers and contracts.
- If it is not possible to comply with the consent limits, excess water would need to be transferred from site either for use at another site or to a suitably permitted waste facility with all Duty of Care documentation retained.
- Wherever practicable, water company sampling should be witnessed, and any issues raised with the Sustainability Department.
- Please review your site trade effluent consent and ensure that you are following the Best Practice Compliance Reminders.