



1 Background

South Gippsland Water (SGW) is a statutory corporation with water supply and sewerage responsibilities conferred on it by the **Water Act 1989**.

In addition to SGW’s role of providing water supply, sewerage services, recycled water, and biosolids reuse, SGW may also provide a trade waste service to its customers.

This procedure aims to promote the effective and efficient management of trade waste for the protection of the health and safety of SGW’s staff and the public, the environment and SGW’s infrastructure and treatment processes. This procedure plays a pivotal role in promoting the sustainable use of resources by minimising waste and facilitating the use of recycled water.

SGW seeks to establish a relationship of trust with trade waste customer’s and encourage cleaner production, waste minimisation, fit for purpose use and water conservation using the philosophy of the Victorian EPA’s Waste Hierarchy in order to progress towards sustainable development. This can be assisted through the provision of a sound and affordable trade waste disposal service conveyed via a reliable sewer network and effective wastewater treatment plants.

This procedure will operate under the auspices of SGW’s Trade Waste Policy and other SGW Policy and Systems ensuring the principles of Occupational Health & Safety, Quality and Environmental Management are applied to trade waste governance.

2 Purpose

To detail specific requirements and procedures in relation to trade waste:

- To be applied by SGW personnel;
- To be complied with by customers.

3 Scope

This Trade Waste Management Policy applies throughout every sewerage district and any other area outside a sewerage district, where SGW provides a trade waste service.

4 Definitions

acceptance criteria:	means the general acceptance criteria for trade waste as defined, from time to time, pursuant to this Trade Waste Management Policy and approved by the ESC.
Act:	means the <i>Water Act 1989</i> .
consent:	means a trade waste agreement in the nature of a consent to discharge trade waste issued by SGW.
customer:	means a person who is in occupation or control of a premises whether or not the person owns the premises.
customer specific acceptance criteria:	means specific standards for a customer, which may be a modification to the Acceptance Criteria, detailed in a trade waste agreement.
EPA:	means the Environment Protection Authority, Victoria.
ESC:	mean the Essential Services Commission, Victoria.
MSDS:	Material Safety Data Sheets.

person:	means an individual, body or association (corporate or unincorporated), a partnership, Commonwealth, State and Territory municipal and other statutory authorities, government departments and agencies.
premises:	means the whole or part of any land, building, structure, vehicle and/or vessel within which or from which any trade waste is created, dealt with or otherwise discharged or capable of being discharged.
sewage:	means any human excreta or domestic waterborne waste, whether untreated or partially treated, but does not include trade waste.
sewerage district:	means the areas specified by the Act, or by Ministerial order under the Act, to be a sewerage district of SGW.
sewerage system:	means any pipe, channel, tunnel or other conduit, treatment plant, storage or waste disposal or re-use infrastructure which is constructed or provided for the conveyance and/or treatment of sewage or trade waste and is managed, vested in or owned by SGW.
trade waste:	means any waterborne waste (other than sewage) prescribed by regulations made under the Act to be trade waste.
trade waste agreement:	means an agreement entered into or issued by SGW which permits the discharge of trade waste.
SGW:	means South Gippsland Region Water Corporation.

5 Legal and policy framework

5.1 Introduction

Trade waste is regulated or controlled by legislation, regulation and other guideline or policy as follows:

- *Water Act 1989* ("**Water Act**");
- *Water (Trade Waste) Regulations 2014* ("**Trade Waste Regulations**");
- Trade Waste Customer Code and SGW Trade Waste Customer Charter;
- Trade Waste Policy adopted by SGW; and;
- this Trade Waste Procedure;

The practical outcome of the above is:

- no trade waste discharge is allowed into SGW's sewerage system unless an appropriate trade waste agreement (including consent) exists, in accordance with this Trade Waste Procedure;
- existing trade discharge may only continue if they have an existing trade waste agreement or consent.

Trade waste discharge is generally divided into:

- minor trade waste discharge; or
- major trade waste discharge.

There are three types of trade waste agreements namely:

- Major trade waste Agreements;
- Minor trade waste Consents;
- Deemed trade waste Consents.

5.2 What is Trade Waste?

Trade waste is the discharge of waterborne waste, excluding sewage, from an industrial or commercial property.

- Sewage (often referred to as domestic sewage) is not trade waste.
- Trade waste is divided into categories dependent upon its make up or strength (that is its components).

Trade waste is specifically defined in the Water (Trade Waste) Regulations 2014 as follows:

Trade Waste: Liquid waste (not including domestic sewage) discharged by industry, business or commercial enterprises. Trade Waste is specifically defined in the *Water (Trade Waste) Regulations 2014* as follows:

- “(a) any superfluous matter derived from, or that is a by-product of, a trade, industrial, commercial, medical, dental, veterinary, agricultural, horticultural or scientific activity;
- (b) any waste matter (other than waste matter that is discharged from private residences)—
- (i) that consists solely or partly of food; or
 - (ii) which results from any process connected with the preparation of food;
- (c) any waste matter discharged from a laundry—
- (i) used for the purposes of a private or public hospital, school or other institution; or
 - (ii) used for the purposes of a hotel, motel or similar establishment; or
 - (iii) where use of the laundry is subject to the payment of a fee; or
 - (iv) used for any other commercial purpose;
- (d) any waste matter discharged from—
- (i) any cooling, refrigeration or air-conditioning system installed on premises on which any activity referred to in paragraph (a) occurs; or
 - (ii) a ship's ballast; or
 - (iii) municipal or commercial swimming pools, including filter backwash effluent; or
 - (iv) any primary, secondary or tertiary educational establishment where the matter is a by-product of a scientific, artistic or photographic activity or any trade based training activity;
- (e) any superfluous matter derived from, or that is a by-product of, a desalination process or that is discharged from works used in a desalination process, whether on residential or non-residential premises;
- (f) any superfluous matter derived from, or that is a by-product of, a groundwater quality monitoring system, a groundwater extraction and disposal system or a groundwater treatment system;

- (g) any superfluous matter derived from, or that is by-product of, construction activities;
- (h) run-off from water used to extinguish a fire or to deal with any other hazard or emergency on premises on which an activity referred to in paragraph (a) occurs;
- (i) leachate from any private, commercial or municipal landfill or from a commercial composting or vermiculture facility;
- (j) sewage sludge from a facility for the disposal of septic tank sludge or sewage treatment plant sludge.”

5.3 SGW Policy Background

SGW has adopted the principals of ecologically sustainable development which can be very broadly defined as a development that meets the needs of the present generation without compromising the ability of future generations to meet their own needs.

In particular, SGW is committed to improving the efficiency with which resources are used and to minimise the impact of trade waste on its system for the benefit of the community and the environment.

By comparison to domestic waste, trade waste exerts a greater demand on the sewerage system and provides a greater pollution load for the treatment plants to manage. Trade waste also presents risks to sewer maintenance personnel and if inappropriately managed can compromise SGW's regulatory compliance position.

SGW operates eleven sewerage systems, each having its own transfer and treatment system responsible for managing a varying hydraulic and pollution load profile. The dischargers in each of these catchments are predominantly residential and commercial with some industrial customers. SGW has established several beneficial reuse schemes, and is looking to further develop these.

This procedure provides industrial developments with the opportunity to augment existing SGW infrastructure at its cost and secure capacity for the processing of its waste. This would be subject to the wastewater being treated by conventional sewage treatment processes.

This procedure along with [PTW-001 Trade Waste Policy](#) has been adopted by SGW to achieve its objectives and to identify SGW's requirements for industry and the wider community in the acceptance and management of Trade Waste.

SGW's primary objective is to operate and maintain a sewerage system to service residential, commercial and light industrial businesses. The sewerage system was designed many years ago to carry, predominantly, domestic waste water including sewage, which is of a predictable quality.

SGW's Trade Waste objectives are:

- To ensure that trade waste permitted into the sewer can be treated through SGW treatment processes, and subsequently comply with any EPA licence conditions before discharge to the environment;
- To protect the safety of its personnel and the general public;
- To protect SGW's assets from unsafe or unsuitable substances;
- To ensure compliance with the ESC's Trade Waste Customer Service Code and SGW's Trade Waste Customer Charter;
- To encourage waste minimisation amongst its trade waste dischargers;

- To manage trade waste in a cost effective manner and recover the true cost of accepting, treating and disposing of trade waste discharged to the sewerage system, as well as providing financial incentives for waste minimisation;
- To ensure that trade waste accepted to the sewerage system does not limit the ability of the Corporation to reuse biosolids or treated effluent.

5.4 Essential Services Commission

The Essential Services Commission has jurisdiction for regulating pricing regimes under the *Essential Services Commission Act 2001* and the *Water Industry Regulatory Order 2003* made by the Governor in Council.

The ESC released a Trade Waste Customer Service Code to provide water corporations with a consistent, transparent and timely decision making approach to trade waste management throughout Victoria. The Corporation has developed a Trade Waste Customer Charter as required by the Code.

The Trade Waste Customer Charter informs customers about the trade waste services performed by the Corporation, along with various rights and responsibilities.

5.5 Environment Protection Authority

The Environment Protection Authority (EPA) issues Waste Discharge Licences with respect to the discharge of treated effluent to either a receiving water body (e.g. creek) or land by way of an irrigation scheme. The licences also stipulate requirements for the safe disposal of sewage sludge.

The EPA has a number of acts and legislations which will also influence the extent to which SGW may receive trade waste in order not to compromise its EPA compliance.

In addition, under the EPA's Prescribed Waste Policy / Guidelines, SGW is required to encourage and promote cleaner production to its Industrial Waste customers and subsequently require them to prepare a Waste Management Plan as part of its Trade Waste Agreement conditions.

6 Acceptance Criteria

6.1 Acceptance Criteria

The nature and levels of the components and characteristics of any trade waste discharged to sewer must comply at all times with the standards outlined in [NTW-001 Trade Waste Statement of Approved Acceptance Criteria Information](#).

The acceptance criteria must be submitted to and approved by the Essential Services Commission in accordance with the Trade Waste Customer Code and Trade Waste Customer Charter. Any future variation to those Acceptance Criteria is subject to publication, consultation and approval process again administered through the Essential Services Commission.

6.2 Customer Specific Acceptance Criteria

SGW may allow or require a trade waste customer to comply with customer-specific acceptance criteria in addition to, or instead of, some or all of the acceptance criteria.

Customer specific acceptance criteria may be assessed to apply to a particular customer, including at the request of a particular customer.

Customer specific acceptance criteria:

- Will be set out in a particular Agreement/Consent;
- Apply for the term of that Agreement/Consent unless varied by and at the discretion of SGW.

7 Application

7.1 Application procedures

All customers are required to apply for a Trade Waste Discharge by lodging Application for Trade Waste Agreement Form ([FTW-006](#)) in writing. The Corporation will assess the application to determine whether the customer will require a consent or agreement.

The applicant may need to provide the following relevant information in their submission:

- The rate of discharge including the average per day, maximum per day and per hour;
- Hours of the day during which discharge takes place;
- Characteristic of waste including nature of source, expected maximum and average concentration of pollutants;
- Details of any proposed treatment facility, location and site plan. These should include internal wastewater drainage;
- Treatment process details and pump sizes, operational characteristics and operational procedures;
- Flow diagram and hydraulic profile of proposed treatment facilities;
- The method of disposal for other wastes that are not to be discharged to sewer.

In addition, the applicant may be required to provide additional information and this must be provided to SGW before the application can be considered. Information to assist in completing the application form can be found in [STW-006a Trade Waste Application Procedure](#).

The SGW decision to accept trade waste into the sewer system will be based on the discharge meeting SGW's requirements.

In determining an application to discharge trade waste in the sewer, SGW will consider:

- The protection of public health and its employees;
- The protection of the environment;
- The protection of SGW's assets;
- The impact the trade waste will have on the ability of the sewage treatment system to meet EPA requirements;
- Waste minimisation;
- Intended reuse of treated effluent and/or biosolids;
- Costs associated with accepting such a discharge.

The Corporation will provide a response to an Application within 10 business days of receiving the application advising:

- Whether the application has been accepted or rejected, or accepted with amendments; or
- Where a longer period is required to assess the application, when a decision will be made and an explanation for the longer period; or
- Where further information is required to enable a full assessment, what further information must be provided by the applicant.

If the application is approved, SGW will then prepare a formal Agreement or Consent with terms and conditions for the discharge of the trade waste to sewer.

Discharge of trade waste to sewer must not occur until:

- If via an Agreement, that Agreement is signed by both SGW and the Customer;
- If via a Consent, after that Consent is issued by SGW.

A copy of the SGW's Trade Waste Customer Charter will be provided to all trade waste customers within one month of entering into a consent or agreement.

If the application is refused by SGW, the applicant will be notified as to the grounds for refusal.

8 Fees and Charges

SGW will impose fees and charges in connection with trade waste in accordance with the prices and pricing principles set out in the price determination made by the Essential Services Commission for SGW.

Trade waste charges should ensure equity in sewerage services charging when compared with domestic rates. Trade waste charges should not be subsidised by other contributions to the wastewater system and the charge should reflect a user pays principle. Additionally, trade waste charges are used as an incentive to customers to firstly reduce the amount of trade waste discharged to the sewerage system and secondly improve the quality of the trade waste, thereby reducing the potential impact to the sewerage network and the environment.

Charges shall be assessed by reference to waste categories. The categories are based on waste quantity and quality. Determination of an applicable discharge category may be made by negotiated agreement or by measurement of the discharge quantity and quality. It may also be based on whether or not the discharge source is considered a high polluting industry. Re-assessment of categories at the customer's request will only be undertaken on an annual basis unless otherwise specified in the Trade Waste Agreement.

Trade waste tariffs and charges are applied to all trade waste customers to cover the costs of processing trade waste applications and to cover the costs associated with the ongoing management of trade waste. These charges are applied in accordance with the prices and pricing principles set out in the current ESC pricing determination.

The charges for providing a sewerage service for the disposal of trade waste may include any or all of the following elements:

- Trade Waste Agreement Application Fee;

- An annual operating charge or “Management Fee” related to the operating costs associated with the transfer, treatment and disposal of the volume and mass of pollutants in the discharge;
- The cost for flow monitoring, sampling and testing of the trade waste.

The application fee is for the administration and technical services provided by SGW in considering the application and the administration and inspection costs associated with providing the initial service including preparation of the Trade Waste Agreement. The discharger will be required to pay for any work associated with the actual connection of trade waste to the sewer.

In addition to the above elements, additional charges may be applied for the discharge of non-conforming effluent incorporating the following elements:

- A non-compliance operating charge applied when the discharge does not conform to the agreed conditions.

Septic Tank and other tankered liquid waste fees shall be charged on a calculated volume basis (\$/kL) which takes into account both the volume and quality of the waste. Licensed waste transporters and other persons disposing of septic tank, portable toilet or other approved liquid waste to the sewer or wastewater treatment plant under approved conditions shall be charged for this service.

Charges are determined annually and will be based on the discharge categories set out in Part 9.

9 Classification of Trade Waste Customers

SGW will categorise trade waste customers into category 1, 2 or 3 with consideration to the type of business, industry or activity carried out by the customer. The Corporation will also consider the risk associated with the acceptance of a customer’s trade waste by taking into account:

- Customer location relative to treatment plant;
- Volume of trade waste discharged;
- The nature of the customer’s business activity;
- The nature and quality of the customer’s trade waste;
- Compliance performance history for a customer, where available;
- Any risk to personal health and safety;
- Any risk to the sewerage system (transport or treatment);
- Any risk to the quality of recycled water or biosolids from the sewerage system;
- Any risk to the environment.

SGW has the right to change any trade waste customer’s classification due to the customer’s changed circumstances or new information coming to the attention of SGW.

SGW assesses the risk of a trade waste customer by using a risk ranking process that uses a formula to calculate the risk a trade waste discharge may represent by establishing a ‘Risk Rank’ for the particular discharge. The Risk Rank is then used to determine which category the customer will be classified in, and the extent to which SGW is required to mitigate against the risks through prescriptive management tools such as sampling, monitoring, charging and analysis.

9.1 Category 1

This category takes into account domestic type waste but with low volume and low strength Trade Waste as follows:

- Volume less than 5 kL/day;
- Quality to comply with *NTW-001 Trade Waste Statement of Approved Acceptance Criteria*.

The typical maximum volume for low risk or commercial trade waste discharges is 5 kilolitres per day. The quality concentrations listed in the acceptance criteria are representative of the maximum domestic concentrations that can safely be transported and treated at a biological waste water treatment plant before overloading capacity and or blocking systems.

The Trade Waste dischargers likely to be classified into this category may include but are not limited to:

- Take away shops;
- Small restaurants;
- Butchers;
- Bakeries;
- Small hotels/motels;
- Swimming Pools;
- Small Cooling Towers;
- Medical centres.

9.2 Category 2

This is domestic type waste but with greater volume and higher mass loads.

- Volume 5 – 10 kL/day;
- Quality to comply with *NTW-001 Trade Waste Statement of Approved Acceptance Criteria*.

The Trade Waste customers which may fall into this category include but are not limited to:

- Shopping complexes;
- Hospitality industry;
- Commercial industry;
- Mechanical workshops.

9.3 Category 3

This category is for industrial dischargers that have waste quality and quantity that is significantly greater than domestic waste but can be treated at a SGW wastewater treatment facility. Additionally they can contain pollutants that may affect the operation of SGW's sewerage system. These parameters are broadly categorised below:

- Heavy metals;
- Phenol;
- Cyanide;

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- Sulphur compounds;
- Fluoride;
- Total Dissolved Solids;
- Phosphorus;
- Nitrogen;
- Sodium;
- pH;
- Ammonia;
- Oil & Grease.

The parameters listed above can fall outside the capacity of WWTP's to effectively treat, and as such they require additional risk management measures by SGW to ensure their own compliance with licence conditions for discharge to the environment.

The following criteria will be used for determining when a discharger is classified as Category 3:

- Volume greater than 10 kL/day;
- Quality to comply with *NTW-001 Trade Waste Statement of Approved Acceptance Criteria*.

Where a trade waste discharger exceeds the volume or quality limits as stated above, they may be charged according to the trade waste volume and quality discharged, and in accordance with the prices and pricing principles set out in the current ESC pricing determination. Subject to the receipt of an application fee, the Corporation will consider an application for customer specific acceptance criteria.

Typical Trade Waste customers who may fall into this category include but are not limited to:

- Abattoirs;
- Dairies;
- Cheese manufacturers;
- Large food preparation facilities;
- Textile Dying;
- Metal finishing plants;
- Tanneries – Chrome;
- Soft drink manufacturers;
- Chemical plants.

Trade Waste generators with food disposal units (garbage grinders, fruit and vegetable peelers) shall be charged under this category as they contribute a higher load and concentration of biochemical oxygen demand and suspended solids per kilolitre of trade waste.

Customers who fall into this Category may require specific individual assessment and independent Trade Waste Agreements to establish negotiated terms, conditions and charges appropriate to the local circumstances.

Note: Trade Waste Categories

The volume limit and or ranges for each category is based on the average volume discharged from trade waste customers in the industry groups listed, and the volumetric impacts at WWTP's for accepting these volumes. Consideration has also been given to the potential for various rates of discharge to impact on the sewer and the WWTP.

The trade waste categories listed above are for the categorisation of trade waste customers for the purposes of charging and risk management practices and should be applied in addition to the risk determining procedures used to establish a Trade Waste Agreement.

For all Trade Waste Parameter Standards, reference should be made to South Gippsland Water's [NTW-001 Trade Waste Statement of Approved Acceptance Criteria Information](#), and South Gippsland Water's Quality Procedures.

10 Trade Waste Agreements

10.1 Agreement to discharge

The discharge of trade waste into the sewerage system is permitted only when the discharger has made application for and received approval from SGW via one of the forms of trade waste agreement.

SGW only approve applications for a Trade Waste discharge where hydraulic and treatment capacity is available and which will not hinder the future growth capacity which has been allocated for domestic and commercial growth.

There is an opportunity for industry to negotiate the augmentation of the sewerage system in order to secure existing and future capacity. However any augmentation works will be at the expense of the customer.

Where circumstances are warranted, special disposal arrangements may be approved by SGW only if safe to do so. These circumstances will only be considered for the following conditions:

- Road tankers by approved private sector transporters and discharge of difficult waste or high strength organic wastes direct to SGW's wastewater treatment process;
- Control discharge from industrial premises of assessed one-off waste batches.

10.2 Form of Agreement

There are three types of agreements that allow the discharge of trade waste into SGW's sewerage system. These different types and the basis for differentiation, is set out as follows:

10.2.1 Major trade waste – Agreement

This agreement is utilised for both category 2 and 3 trade waste customers.

This more significant discharge requires a greater level of management and detail.

Application is made in the required manner, otherwise set out in this Trade Waste Procedure policy at Part 7.

10.2.2 Minor Trade Waste – Consent agreement

Customers who discharge category 1 trade waste are required to have a Consent.

Application is made in the required manner, otherwise set out in this Trade Waste Procedure policy at Part 7.

The Consent is a form of agreement and is a less detailed document which:

- Is issued by the corporation with an attached schedule and conditions;
- Does not need to be signed by the customer in order to operate.

10.2.3 Deemed Agreement - Minor trade waste

South Gippsland Water has a number of non-residential customers who discharge to the sewerage system and would come under the definition of "Trade Waste" but are considered too small for South Gippsland Water to require a Trade Waste Agreement or Consent, and do not warrant the additional level of administration and monitoring that comes with this.

Clause 4.4 of the ESC Trade Waste Code makes provision for dischargers of trade waste of a nature similar to domestic sewage, at South Gippsland Water's discretion, to have their agreement arise automatically through customer conduct, these types of customers are classified as "Deemed" Trade Waste customers.

This category takes into account customers that discharge low volumes of trade waste which is of a similar nature to domestic sewage, as follows:

- Volume less than 1 kL/day;
- Quality to comply with [NTW-001](#) *Trade Waste Statement of Approved Acceptance Criteria Information*.

The trade waste dischargers that may be considered a "deemed" trade waste customer may include, but are not limited to:

- Small food businesses;
- Sporting clubs (without catering facilities);
- Doctors surgery/clinic;
- Opticians;
- Florists;
- Funeral parlour;
- Tattoo/piercing establishments;
- Beauticians.

SGW may, in relation to such customers, for good cause, require that customer to make an application for a Trade Waste Agreement or Consent, as is appropriate dependent on the circumstances.

11 Continued discharge without agreement

In accordance with the *Water Act 1989*, no trade waste discharge is permitted into SGW's sewerage system without an appropriate trade waste agreement or consent. South Gippsland Water has instituted a program of education and reminders to invite those businesses which do not have an appropriate trade waste agreement or consent to apply.

After appropriate opportunities have been given to comply, it may be necessary for the Corporation to take more serious steps, which may include:

- A formal Notice under the *Water Act 1989* in relation to contraventions and/or the requirement to carry out particular works;

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- Subject to appropriate preconditions, South Gippsland Water can enter the premises and carry out works, and recover the cost of those works from the business operator;
- To cut off the trade waste discharge service to the premises;
- To prosecute the business operator for a breach of the *Water Act 1989*.

Whilst enforcement action is regrettable, a continuing discharge into the sewerage system, without the necessary trade waste agreement or consent, is a breach of the law and has the potential to adversely impact the environment through its impact on the sewerage system.

12 Dispute Resolution

The Corporation will comply with [PCS-002 Complaints and Dispute Handling Policy](#) and the terms of the trade waste agreement in dealing with any complaints made by the customer, or any dispute arising from the trade waste agreement.

Where a complaint escalates beyond the Complaints and Dispute Handling Policy and relates to technical or economic aspects of trade waste management, SGW may take steps including:

- With consent from the customer, engage the services of an independent expert or mediator to help resolve the complaint;
- Advise the customer that they may request that the Essential Services Commission consider whether the water business has complied with the ESC Trade Waste Code, the Customer Service Code, or the Corporations price determination.

13 Responsibilities

Environment & Wastewater Manager: is responsible for ensuring trade waste system compliance in order to meet relevant regulatory requirements.

Wastewater / Trade Waste Coordinator and Officer: are responsible for the implementation of this procedure.

14 References

- PTW-001 Trade Waste Policy
- PCS-002 Complaints and Dispute Handling Policy
- STW-006a Trade Waste Application Procedure
- NTW-001 Trade Waste Statement of Approved Acceptance Criteria Information
- FTW-006 Application for Trade Waste Discharge Form
- [FTW-008](#) Trade Waste Consent Form
- [FTW-008a](#) Trade Waste Agreement Form

This document is to be reviewed in **March 2018** or earlier as required.
 This document must not be released to external parties without approval by the Managing Director.

DOCUMENT APPROVAL		
Senior Manager Approval:	Ravi Raveendran	Date: 09/03/2016
Managing Director Signature:		