# CATEGORY C – HIGH RISK

## Background

As detailed in the Icon Water publication *STD-SPE-P-003 Trade Waste Approval and Compliance Requirements*, activities that generate liquid trade waste for discharge into the Icon Water's Sewerage Network ***must*** comply with specific requirements.

Any capitalised terms used and not defined in this guide note has the same meaning as in Icon Water publication *STD-SPE-P-003 Trade Waste Approval and Compliance Requirements.*

## Purpose

The purpose of this guide note is to provide detail on the specific requirements for liquid trade waste generated from activities that has been deemed by Icon Water to be Category C. These activities pose a high risk to Icon Water Assets, treatment processes, the environment and workers etc.

## Compliance

The Trade Waste Customer remains responsible and liable for ensuring compliance with this guide note even if the occupier of the premises is another party or entity.

In the event the Trade Waste Customer or the occupier of the premises fails to comply with this guide note, Icon Water may take any and all corrective actions as specified in the Icon Water publication *STD-SPE-P-003 Trade Waste Approval and Compliance Requirements* and the Liquid Trade Waste Negotiated Contract.

## Guidance

The following table details facilities and requirements for Category C discharges relevant to this guide note.

**Table 1. Category C requirements**

| Category C Requirements |
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| i. A business/discharge type that would otherwise be deemed to be a Category A discharge except that the maximum allowable daily discharge volume exceeds 20 kL/day. |
| ii. A business/discharge type that would otherwise be deemed to be a Category B discharge except that the maximum allowable daily discharge volume specifically detailed in Table B.1 of Icon Water publication *STD-SPE-P-003* has been exceeded. |
| iii. A business/discharge type categorised using Categorisation Method 2 with a RIF score greater than the value stated in Table 7.3.1 of Icon Water publication *STD-SPE-P-003*<br>Note: Discharge volume is used in determining the RIF score. |
| iv. A discharge that otherwise does not meet all of the requirements to deem it to be either a Category A, Category B or Category S discharge. |

### Excluded substances/equipment/processes

The following are prohibited from discharging to the Icon Water Sewerage Network:

- Wastewater containing chemicals or substances above our acceptance criteria (or not listed) in Icon Water publication *STD-SPE-P-003 Trade Waste Approval and Compliance Requirements.,* unless written approval obtained from Icon Water.

## Pre-treatment requirements

The Trade Waste Customer is required to undertake a detailed assessment of the liquid trade waste generated from their business activities and install, operate and maintain pre-treatment devices and/or systems to ensure compliance with our acceptance criteria.

Given the vast array of facilities or business activities conceivable, it is not possible to list all pre-treatment devices here. Where relevant, pre-treatment requirements detailed in our other published Guide Notes and referenced in Icon Water publication *STD-SPE-P-003* must be considered.

## Backflow prevention

The Trade Waste Customer must install a backflow device on the Icon Water meter (s) for the property as per requirements of the Environment and Planning Directorate at Access Canberra. In addition, installation of a tap within 5 metres of any pre-treatment equipment (e.g. grease trap) and a backflow prevention device on the inlet side of the tap must be completed.

The backflow device(s) must be tested every 12 months by a licensed plumber who is accredited in backflow prevention to ensure it is operating correctly and to identify if the valve requires servicing/repair. After testing a valve, the Licensed plumber must lodge a test certificate with Access Canberra, the plumbing regulator.

## Discharge meter and sampling

The Trade Waste Customer must install a flow metering system and equipment to allow collection of data concerning the flow rates and volume of liquid trade waste discharged to our Sewerage Network. The measured liquid trade waste volume is used to calculate the masses of the substances discharged.

The flow meter must be an electromagnetic flowmeter and it must be fitted with Amphenol plugs to allow for flow proportional sampling.

Note:

- The volume of liquid trade waste discharged must be obtained from the reading of the total flow on the on the discharge meter.
- To enable flow proportional sampling, it is important to have the flow meter adjacent to the sampling point so that an automatic sampler can be connected to the appropriate plug.
- The sampling point must be immediately prior to the point where the liquid trade waste leaves the premises and enters the sewerage system and/or mixes with domestic sewage from the premises.
- The flow meter must be equipped with a 240-volt AC power supply. The flow meter must be “hardwired” to the electrical supply. In addition, a suitable 240-volt AC power outlet must be available
- The flow metering system must be calibrated at least annually at the Trade Waste Customer's expense. It must be completed using a volumetric method or a check flow meter, with methods and instrumentation having full traceability to National Standards through a N.A.T.A. registered laboratory. The certificate of calibration must be submitted to Icon Water upon completion of each calibration.

## Chemical handling and storage

Safety data sheets for any chemicals stored in bulk on-site and may be present in the wastewater, must be provided to Icon Water as an attachment with the Icon Water liquid trade waste application form.

Chemicals should be stored in an area where any spillage cannot drain to Icon Water’s Sewerage Network or stormwater system. Concentrated chemicals e.g. acids, caustic and other corrosive chemicals must not be discharged to Icon Water’s Sewerage Network. Chemical solutions containing small quantities of these substances should be neutralised before discharging to Icon Water’s Sewerage Network.

## Housekeeping practices

Given the vast array of facilities or business activities conceivable, it is not possible to list all housekeeping practices here. Where relevant these requirements as detailed in our other published Guide Notes and referenced in Icon Water publication *STD-SPE-P-003* must be considered.

## Compliance management

### Sampling

A sampling point, suitable for taking representative samples must be provided immediately prior to the point where the liquid trade waste leaves the premises and enters the Sewerage Network and/or mixes with domestic sewage from the premises (*Refer to Discharge meter and sampling above*).

Samples of Liquid Trade Waste randomly collected by Icon Water and used for determination of compliance will be analysed by a laboratory registered by the National Association of Testing Authorities (N.A.T.A).

#### *Sample collection*

Samples must be collected and tested monthly for the first 12 months of a “New Approval”. The compliance status of these first 12 months of sample results will be considered when updating the “New Approval” to a “Full Approval” and will be documented in any Liquid Trade Waste Negotiated Contract.

All sample collection must be conducted by persons appropriately trained in liquid trade waste or environmental compliance sampling techniques.

#### *Analysis*

Analysis of any Liquid Trade Waste must only be undertaken by a laboratory which is:

- registered for the relevant parameters by the National Association of Testing Authorities (NATA); or
- approved in writing for the purpose by Icon Water.

#### *Results*

The results of the sample analysis are to be submitted by the Trade Waste Customer or their contracted laboratory to Icon Water within 10 working days from the date the sample was taken.

In addition to the certificate of analysis, the results must be provided in .xlsx or .csv file format.

### Record keeping

The Trade Waste Customer must at its own cost:

- maintain records including, where applicable, appropriate contracts and maintenance schedules in relation to the cleaning and maintenance of all equipment used to discharge or sample Liquid Trade Waste.
- maintain appropriate records to demonstrate compliance with the Liquid Trade Waste Negotiated Contract at all times.
- provide any of these records to Icon Water for the purposes of compliance assessment.
- provide Icon Water with a reading from the Liquid Trade Waste discharge flowmeter on the first day of each quarter; 1 January, 1 April, 1 July, 1 October.

### Site inspection

Icon Water personnel may attend the premises to conduct site inspections to verify compliance with the Liquid Trade Waste Negotiated Contract. The indicative frequency of site inspections is detailed in Section 9.12 of Icon Water publication *STD-SPE-P-003 Trade Waste Approval and Compliance Requirements.*

The Trade Waste Customer must allow Icon Water, access at all reasonable times to:

- the premises:
- to measure Liquid Trade Waste flows.
- to take and analyse Liquid Trade Waste samples; or
- to inspect fittings or works related to the discharge of Liquid Trade Waste.
- any records maintained in association with the Liquid Trade Waste.

## Liquid Trade Waste Application

The Liquid Trade Waste Application must be completed in full and submitted online. The following information must be attached to the Application form:

- detailed explanation of the activities/processes generating the Liquid Trade Waste.
- likely substances in waste streams intended for discharge to Icon Water's Sewerage Network.
- estimated maximum flow rate of discharge to sewer (litres per second)
- a list of chemicals stored in bulk on-site and may be present in the Liquid Trade Waste.
    - current Safety Data sheets for these chemicals.
- site drainage plans and details of existing and/or proposed pre-treatment devices/systems including:
    - process diagrams/associated drainage plans.
    - description of the pre-treatment technology (i.e. what/how is it treating the Liquid Trade Waste).
    - other instrumentation requirements – flowmeter, pH correction etc, as applicable.
    - capacity of pre-treatment equipment
    - flow rate of pumping equipment
    - detention times of tanks/pits and ponds
- maintenance schedule for pre-treatment equipment, including all pits, tanks, pumps, etc./details of maintenance personnel.
- expected waste quality after pre-treatment, confirmation by one of the following:
    - supply sample analysis data of the proposed waste quality.
    - guarantee by equipment supplier.
    - supported and recommended by consultant.

In addition, the applicant should also provide:

- a copy of any relevant report, such as an Environmental Impact Assessment.
- a copy of the trade waste consultant's report, if applicable.
- plans and specifications of the work to be carried out.
- details of the intended use of introduced micro-organisms (bioadditives), if applicable.
- details of any recycling program or water reuse system.
- details of solids disposal.
- any plans for future expansion (sewer capacity may not be available in the future for the intended discharge).
- any additional details as requested by Icon Water.
- a Due Diligence Program and a Contingency Plan.

**Due diligence program**

A due diligence program identifies potential health and safety, environmental or other hazards (e.g. spills, accidents or leaks) and appropriate corrective actions aimed at minimising or preventing hazards. A due diligence program must be prepared and attached to the Liquid Trade Waste application. The program must address the following points at a minimum:

- identification of potential or hazardous situations (asking 'what if this or that happens?', 'what action will be taken?' what, where, how, when for all situations (Predict, Prepare, and Practice)
- staff training and awareness program
- environmental audit procedures

- measures to ensure that liquid trade waste discharged to the sewerage system complies with the conditions of approval
- measure to ensure there is no discharge of stormwater to the Sewerage Network
- a treatment plant maintenance schedule
- a flow meter totaliser capable of retaining its reading in the event of a power failure
- ensuring the pH correction system, if provided, cannot be tampered with
- plant operator training
- standby procedures, including relief plant operator training
- OH&S training
- accountability and final destination of any waste disposal program
- effective solids and liquid waste disposal procedures
- a logbook (accessible to Icon Water) detailing maintenance and cleaning operations noting date, time and person making entry
- management of waste not intended or not permitted to be discharged to Icon Water's Sewerage Network (e.g. sludge, prohibited substances, waste streams prohibited for discharge to Icon Water's Sewerage Network), including: contractor details, details of the receiving facility, a logbook (accessible to Icon Water) with collection dates, quantity and disposal locations.

**Contingency plan**

A contingency plan is a set of procedures for responding to an incident that will affect the quality of Liquid Trade Waste discharged to Icon Water's Sewerage Network. The plan also encompasses procedures to protect the environment from accidental and unauthorised discharges to the stormwater drainage system from Liquid Trade Waste discharges, and leaks and spillages from stored products and chemicals.

All dischargers should develop, maintain and update as necessary a contingency plan for responding to situations which may arise infrequently at their premises but will pose a threat to the environment or Icon Water's Sewerage Network if allowed to occur without an adequately formulated response plan.

A company's contingency plan should incorporate but not be limited to the following:

- visual and audible alarms located in the area where it can be observed
- preventing overflows to Icon Water's Sewerage Network in the event of an emergency
- a logbook (accessible to Icon Water) noting anything to do with the incident, including date, time, remedial action, other relevant facts and person making entry
- emergency procedures for:
    - an accident (nominated control officer and procedure plans)
    - a spill (clean-up procedures)
    - a breakdown (may be necessary to carry stand-by equipment and spare parts such as pumps if these items are vital for the continuous effective operation of the pre-treatment system)
    - a power failure or disruption (if this occurs, it is unacceptable to discharge untreated Liquid Trade Waste
    - overloading or underloading of wastewater treatment systems - temporary unavailability of trained wastewater operators
    - temporary loss of access to wastewater disposal areas - storm, fire, floods
    - alternative waste disposal procedures and/or an emergency storage if any of the above incidents occur.

- a list of emergency contacts in priority order including phone numbers in an accessible location (business hours and after hours): - internal contacts - external organisation contact information (EPA, Council, fire brigade etc)

Having a contingency plan in place and following it when such an incident or situation arises, enables better responses to incidents which may cause or threaten to cause harm to Icon Water's Sewerage Network, the environment and worker or public health and safety.

## References

- *STD-SPE-P-003 Trade Waste Approval and Compliance Requirements*
- *TW-GN-### - Trade Waste Guide Notes (other published guide notes as relevant)*
- NSW Department of Planning, Industry and Environment

| Issue | Date | Reason for Revision | By |
|---|---|---|---|
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