SINGLETON COUNCIL

Discharge of Liquid Trade Waste to Sewerage System

Policy | Water and Sewer Group

To enable Singleton Council to regulate discharge of waste from business to the sewerage system

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1 Background

1.1 Title of the Policy and Commencement Date

The Discharge of Liquid Trade Waste to Sewerage System Policy takes effect from the date of adoption by the elected Council. Please refer to Policy Register information provided on the cover page.

1.2 Purpose of the Policy

This Policy is to regulate the discharge of non-domestic waste from business premises, and to oversee the scheduled maintenance of wastewater pre-treatment devices situated at these sites. This is to ensure wastewater discharged into Singleton Council's sewerage system is free of potentially harmful contaminants and chemicals.

2 Objective

2.1 Objectives and Coverage of the Policy

The objectives of this policy are to:

- protect public health;
- protect the health and safety of Council employees;
- protect the environment from the discharge of waste that may have a detrimental effect;
- protect Council assets from damage;
- assist Council to meet its statutory obligations;
- provide an environmentally responsible liquid trade waste service to the non-residential sector;
- encourage waste minimisation and cleaner production in the commercial and industrial sectors;
- promote water conservation, water recycling and biosolids reuse;
- ensure compliance of liquid trade waste dischargers with Council's approved conditions;
- provide operational data on the volume and composition of industrial and commercial effluent to assist in the operation of the sewerage system and the design of augmentations or new sewerage systems; and
- ensure commercial provision of services and full cost recovery through appropriate sewerage and liquid trade waste fees and charges.

3 Application

3.1 Application of this Policy

This Policy is applicable to all owners of business enterprises, and the owners of premises these businesses operate from.

4 Definitions

For the purposes of this policy, the table below defines the following terms:

Term	Meaning
Assumed Concurrence	Council may apply to the Secretary of the NSW Department of Planning and Environment (DPE) for authorisation to assume concurrence for Classification B or Classification S activities. Requests for assumed concurrence need to be forwarded to Department of Planning and Environment - Water (DPE Water). If granted, Council will no longer need to forward such applications for concurrence.
Automatic Assumed Concurrence	Councils have been authorised to assume concurrence for Classification A activities. Such applications may be approved by Council without forwarding the application for concurrence.
Biochemical Oxygen Demand (BOD5)	The amount of oxygen utilised by micro-organisms in the process of decomposition of organic material in wastewater over a period of five days at 20°C. In practical terms, BOD is a measure of biodegradable organic content of the waste.
Biosolids	Primarily organic solid product produced by sewage processing which may be used for beneficial reuse. Until such solids are suitable for beneficial use, they are defined as wastewater solids or sewage sludge.
Bunding	Secondary containment provided for storage areas, particularly for materials with the propensity to cause environmental damage.
Chemical Oxygen Demand (COD)	A measure of oxygen required to oxidise organic and inorganic matter in wastewater by a strong chemical oxidant. Wastewaters containing high levels of readily oxidised compounds have a high COD.
Chemical Toilet	Toilet in which wastes are deposited into a holding tank containing a deodorising or other chemicals; wastes are stored and must be pumped out (and chemical recharged) periodically.
Commercial Kitchen/Caterer	For the purpose of this Policy, a commercial kitchen is a premise that is typically a stand-alone operation and prepares food for consumption off-site. These types of businesses typically cater to wedding functions, conferences, parties, etc. This definition would not apply

Term	Meaning
	to a food processing factory supplying pre-prepared meals to an airline company or similar.
Contingency Plan	A set of procedures for responding to an incident that will affect the quality of liquid trade waste discharged to the sewerage system. The plan also encompasses procedures to protect the environment from accidental and unauthorised discharges of liquid trade waste to the stormwater drainage system, and leaks and spillages from stored products and chemicals.
Due Diligence Program	A plan that identifies potential health and safety, environmental or other hazards (e.g. spills, accidents or leaks) and appropriate corrective actions aimed at minimising or preventing the hazards.
Effluent	The liquid discharged following a wastewater treatment process.
Effluent Improvement Plan (EIP)	The document required to be submitted by a discharger who is not meeting the acceptance limits for discharge waste quality set down in Council's approval conditions and/or liquid trade waste approval. The document sets out how the discharger will meet the acceptance limits for the discharge of liquid trade waste to the sewerage system within the agreed timeframe.
Environment Management Plan (EMP)	Document which sets out a site's methods for managing its outputs and outcomes with regard to effect on the environment.
Float Tank	Also known as Iso-tank, sensory deprivation tank or sensory attenuation tank, it contains a soundproof, lightproof environment. Users float in water treated with salts to create a specific gravity equal to the human body. The strength of the salts and sterilisation chemicals used make discharges from these tanks not suitable for discharge to Council's sewer system.
Grease Arrestor	Device used to treat waste water, prior to discharge to the sewerage system, by capturing fats, oils and solids primarily from food businesses.
Heavy Metals	Metals of high atomic weight which in high concentrations can exert a toxic effect and may accumulate in the environment and the food chain. Examples include mercury, chromium, cadmium, arsenic, nickel, lead and zinc.
Housekeeping	A general term, which covers all waste minimisation activities connected with the way in which operations within the premises are carried out.
Industrial Discharges	Defined as liquid waste generated by industrial or manufacturing processes; also known as industrial liquid trade waste.
Liquid Trade Waste	Liquid trade waste means all liquid waste other than sewage of a domestic nature.

Term	Meaning
Liquid Trade Waste Discharge Approval	Approval granted by Local Water Utility under Section 68 of the Local Government Act 1993 to discharge non-domestic wastewater to the sewerage system.
Liquid Trade Waste Agreement	An agreement, in addition to the Liquid Trade Waste Discharge Approval, which sets out further requirements for sites which generate large or complex discharges.
Liquefaction	The process of generating a liquid from a solid or gas by applying physical, chemical and heat processes. The high strength wastes generated by these processes are considered not suitable for discharge to Council's sewerage system.
Mandatory Concurrence	For the liquid waste in Classification C, councils will need to obtain concurrence for each discharger. DPE – Water provides concurrence on behalf of the Secretary, DPE.
Methylene Blue Active Substances (MBAS)	These are anionic surfactants (see Surfactants definition) and are called MBAS as their presence and concentration is detected by measuring the colour change in a standard solution of methylene blue dye.
Minimal Pre-treatment	For the purpose of this Policy includes sink strainers, basket arrestors for sink and floor waste, plaster arrestors and fixed or removable screens.
Open Area	Any unroofed process, storage, washing or transport area potentially contaminated with rainwater and substances which may adversely affect the sewerage system or the environment.
Pan	For the purpose of this Policy "pan" means any moveable receptacle kept in a closet and used for the reception of human waste
pH	A measure of acidity or alkalinity of an aqueous solution, expressed as the logarithm of the reciprocal of the hydrogen ion (H+) activity in moles per litre at a given temperature; pH 7 is neutral, below 7 is acidic and above 7 is alkaline.
Premises	Has the same meaning as defined in the Local Government Act 1993 Dictionary and includes any of the following: (a) a building of any description or any part of it and the appurtenances to it (b) land, whether built on or not (c) a shed or other structure (d) a tent (e) a swimming pool (f) a ship or vessel of any description (including a houseboat) (g) a van.
Prescribed Pre-treatment Equipment	Standard non-complex equipment used for pre-treatment of liquid trade waste, e.g. a grease arrestor, an oil arrestor/separator, solids arrestor or cooling pit.

Term	Meaning
Primary Measurement Device	A device such as a gauging pit, weir tank or flume installed in the liquid trade waste discharge line suitable for installation of instrumentation for flow measurement. In cases of commercial flows this can mean a removable section of pipe (in the fresh water supply to the trade waste area) and the installation of a check meter.
Septage	Material pumped out from a septic tank during desludging; contains partly decomposed scum, sludge and liquid.
Septic Tank	Wastewater treatment device that provides a preliminary form of treatment for wastewater, comprising sedimentation of settleable solids, flotation of oils and fats, and anaerobic digestion of sludge.
Septic Tank Effluent	The liquid discharged from a septic tank after treatment.
Sewer Discharge Factor - SDF	Equal to the total discharge to sewer including liquid trade waste divided by the total water consumption times by 100.
Sewage Management Facility	A human waste storage facility or a waste treatment device intended to process sewage and includes a drain connected to such a facility or device.
Sewage of a Domestic Nature	Includes human faecal matter and urine and waste water associated with ordinary kitchen, laundry and ablution activities of a household, but does not include waste in or from a sewage management facility.
Sewage Treatment Works	Facility designed to treat domestic wastewater through physical, chemical and biological processes.
Sewerage System	The network of sewage collection, transportation, treatment and by-products (effluent and biosolids) management facilities.
Stormwater	Water resulting from a rain event.
Sullage	Domestic wastewater excluding toilet waste.
Surfactants	The key active ingredient of detergents, soaps, emulsifiers, wetting agents and penetrants. Anionic surfactants react with a chemical called methylene blue to form a blue-chloroform-soluble complex; the intensity of colour is proportional to concentration.
Suspended Solids (SS)	The insoluble solid matter suspended in wastewater that can be separated by laboratory filtration and is retained on a filter. Previously also referred to as non-filtrable residue (NFR).
Total Dissolved Solids (TDS)	The total amount of dissolved material in the water.
Trade Waste Discharge Factor - TWDF	Equal to the liquid trade waste divided by the total water consumption times by 100.
Waste Minimisation	Procedures and processes implemented by industry and business to modify, change, alter or substitute work practices and products that will result in a reduction in the volume and/or strength of waste discharged to sewer.

5 Principles/Body

5.1 Procedural Statement

5.1.1 What is liquid trade waste?

Liquid trade waste is defined in the Local Government (General) Regulation 2005 as "Liquid trade waste means all liquid waste other than sewage of a domestic nature."

Liquid trade waste discharges to the sewerage system include liquid wastes from:

- business/commercial premises (e.g. beautician, florist, hairdresser, hotel, motel, restaurant, butcher, service station, supermarket, dentist);
- community/public premises (including craft club, school, college, university, hospital and nursing home);
- industrial premises;
- trade activities (e.g. mobile carpet cleaner);
- any commercial activities carried out at a residential premises;
- saleyards, racecourses and from stables and kennels that are not associated with domestic households; and
- septic tank waste, chemical toilet waste, waste from marine pump-out facilities and established sites for the discharge of pan content from mobile homes/caravans to the sewerage system.

While septic tank, pan and ship-to-shore pump-out waste are defined as trade waste, they are not accepted by Council and are excluded from this Policy.

Liquid trade waste excludes:

- toilet, hand wash basin, shower and bath wastes derived from all the premises and activities mentioned above;
- wastewater from residential toilets, kitchens, bathrooms or laundries (i.e.. domestic sewage);
- common use (non-residential) kitchen and laundry facilities in a caravan park; and
- residential swimming pool backwash.

5.1.2 Criteria for approval to discharge liquid trade waste into Council's sewerage system – factors for consideration

Council's decision to accept liquid trade waste into its sewerage system is on the basis of a preventive risk management framework for managing risks to the sewerage system within an integrated water cycle management context. It will be based on the discharge meeting Council's requirements. When determining an application to discharge liquid trade waste to the sewerage system, Council will consider the following factors:

- The potential for the liquid trade waste discharge to impact on public health;
- The possible impacts the discharge may pose to the environment (land, water, air, noise, or nuisance factors);
- The potential impacts of the discharge on the health and safety of the Council's employees;
- The possible impact of the discharge on Council's sewerage infrastructure or sewage treatment process;
- The capability of the sewerage system (both transportation and treatment components) to accept the quality and quantity of the proposed liquid trade waste discharge;
- The impact the liquid trade waste will have on the ability of the sewerage scheme to meet its Environment Protection Authority licence requirements;
- Compliance of the proposed liquid trade waste discharge with guideline limits in this policy;
- The potential impacts of the discharge on the quality of, and management practices for, effluent and biosolids produced from the sewage treatment process;
- The adequacy of the pre-treatment process(es) to treat the liquid trade waste to a level acceptable for discharge to the sewerage system, including proposed safeguards if the pre-treatment system fails;
- Whether appropriate safeguards are proposed to avoid the discharge of other, non-approved wastes to the sewerage system;
- The adequacy of any chemical storage and handling facilities, and the proposed safeguards for preventing the discharge of chemicals to the sewerage system;
- Whether prohibited substances are proposed to be discharged;
- The potential for stormwater entering the sewerage system and adequacy of proposed stormwater controls;
- Waste minimisation and water conservation programs; and
- The adequacy of the proposed due diligence program and contingency plan, where required.

5.1.2.1 Discharge quality

Council has guideline limits for the acceptance of discharges, as set out in ***Table 5-1***. Council may vary the guideline limits for a particular sewage treatment works depending on the limits set in the Environmental Protection Licence issued by the NSW Environment Protection Authority and other possible risk factors. Where the guideline limits cannot be met, applicants are required to provide justification for exceeding the limits. Based on the type and the proposed contaminant levels, Council may refuse the application, or may approve it subject to an Effluent Improvement Program, or other conditions being implemented.

Parameter	Limits	Analytical Method Reference
General Acceptance Guideline Limits		
Flow Rate	The maximum daily and instantaneous rate of discharge (kL/h or L/s) is set on the available capacity of the sewer. Large dischargers are required to provide a balancing tank to even out the load on the sewage treatment works.	
BOD_5	Normally, approved up to 600 mg/L. In some cases higher concentration for low mass loadings may be acceptable, if the sewage treatment works has sufficient capacity and odour will not be a problem.	5210B
Suspended solids	Concentrations up to 600mg/L may be acceptable.	2540D
COD	Normally, not to exceed BOD_5 by more than three times. This ratio is given as a guide only to prevent the discharge of non-biodegradable waste.	
Total Dissolved Solids	Up to 4000 mg/L may be accepted. However, the acceptance limit may be reduced depending on available effluent disposal options at the sewage treatment works and will be subject to a mass load limit.	2510B
Temperature	Less than 38°C.	
pH	Within the range 7.0 to 9.0.	
Oil and Grease	100 mg/L if the volume of the discharge does not exceed 10% of the design capacity of the treatment works, and 50 mg/L if the volume is greater than 10%.	USEPA1664
Detergents	All industrial detergents are to be biodegradable. A limit on the concentration of 50 mg/L (as MBAS) may be imposed on large liquid trade wastes.	
Colour	No visible colour when the waste is diluted to the equivalent dilution afforded by domestic sewage flow.	
Radioactive Substances	The discharge must comply with the *Radiation Control Act 1990*.	

Parameter	Maximum Concentration (mg/L)	Analytical Method Reference
Acceptance Guideline Limits for Inorganic Compounds		
Ammonia (as N)	50	4500-NH3-B
Boron	5	3120B
Bromine	5	DPD-colorimetric test kit
Chlorine	10	DPD-colorimetric test kit
Cyanide	1	4500-CN-G and E
Fluoride	30	4500-F-C
Nitrogen (Total Kjeldahl)	100	4500-Norg B or C
Phosphorus (total)	20	4500P-I & 4500P-F
Sulphate (as SO4)	500	3120B
Sulphide (as S)	1	4500S2-C&D or E
Acceptance Guideline Limits for Organic Compounds		
Benzene	<0.001	6200
Toluene	0.5	6200
Ethylbenzene	1	6200
Xylene	1	6200
Formaldehyde	30	
Phenolic compounds (non-halogenated)	1	6410B
Petroleum hydrocarbons C_6-C_9 (flammable)	5	
Petroleum hydrocarbons (non-flammable)*	30	USEPA 8015B USEPA 8260B
Pesticides general (except organochlorine and organophosphorus)	0.1	6410B
Polynuclear Aromatic Hydrocarbons (PAHs)	5	6410B & 6440

Parameter	Maximum Concentration (mg/L)	Allowed Daily Mass Limit (g/d)	Analytical Method Reference
Acceptance Guideline Limits for Inorganic Compounds			
Aluminium	100	-	3120B
Arsenic	0.5	2	3114B
Cadmium	1	5	3120B
Chromium – refer notes	3	10	3120B

Parameter	Maximum Concentration (mg/L)		Analytical Method Reference
Cobalt	5	15	3120B
Copper	5	15	3120B
Iron	100	-	3120B
Lead	1	5	3120B
Manganese	10	30	3120B
Mercury	0.01	0.05	3112B
Molybdenum	5	15]	3120B
Nickel	1	5	3120B
Selenium	1	5	3120B
Silver – refer notes	2	5	3120B
Tin	5	15	3120B
Zinc	1	5	3120B
Total heavy metals (excluding aluminium, iron and manganese)	Less than 30 mg/L and subject to total mass loading requirements		

Table 5-1 - Guideline limits for acceptance of liquid trade wastes into sewerage system

Notes on ***Table 5-1***: Where hexavalent chromium (Cr6+) is present in the process water, pre-treatment will be required to reduce it to the trivalent state (Cr3+), prior to discharge into the sewer. Discharge of hexavalent chromium (Cr6+) from chromate compounds used as corrosion inhibitors in cooling towers is not permitted.

The limit on silver is applicable to large dischargers. The concentration of silver in photoprocessing waste where a balancing tank is provided is not to exceed 5 mg/L.

5.1.2.2 Prohibited substances

Some substances are not suitable for discharge to the sewerage system. ***Table 5-2*** summarises those substances which must not be discharged to the sewerage system. Council may not grant approval for the discharge of these substances to the sewerage system unless it is specifically approved under section 68 of the *Local Government Act 1993*. Approval shall not be granted where other legislation prohibits such discharge.

- organochlorine weedicides, fungicides, pesticides, herbicides and substances of a similar nature and/or wastes arising from the preparation of these substances
- organophosphorus pesticides and/or waste arising from the preparation of these substances
- per- and poly-fluoroalkyl substances (PFAS)
- any substances liable to produce noxious or poisonous vapours in the sewerage system
- organic solvents and mineral oil
- any flammable or explosive substance
- discharges from 'Bulk Fuel Depots'
- natural or synthetic resins, plastic monomers, synthetic adhesives, rubber and plastic emulsions
- roof, rain, surface, seepage or ground water, unless specifically permitted (clause 137A of the *Local Government (General) Regulation 2005*)
- solid matter
- disposable products including wet wipes, cleaning wipes, colostomy bags, cat litter and other products marketed as flushable
- any substance assessed as not suitable to be discharged into the sewerage system
- waste that contains pollutants at concentrations which inhibit the sewage treatment process – refer *Australian Sewage Quality Management Guidelines, June 2012*, WSAA
- any other substances listed in a relevant regulation.

Table 5-2 – Substances prohibited from being discharged into the sewerage system

5.1.2.3 Stormwater discharges from open areas

Stormwater is a prohibited discharge under this policy. The ingress of stormwater into the sewerage system can cause operational problems to the system and result in sewer overflows, as the sewerage system does not have the capacity for such flows. Therefore, Council does not generally accept the discharge of stormwater to the sewerage system.

However, it is recognised that it may not always be possible or practical to prevent all stormwater entering the sewerage system at some liquid trade waste premises. The discharge of limited quantities of first flush stormwater from sealed areas will be considered where roofing cannot be provided because of safety or other important considerations. The discharge from unsealed areas is not permitted.

Before the stormwater will be considered for discharge to the sewerage system, the applicant must provide the following information:

- reasons why the area cannot be fully or partially roofed and bunded to exclude stormwater;
- the dimensions and a plan of the open area under consideration;
- whether the open area is sealed;
- the estimated volume of the stormwater discharge;
- information on rain gauging;
- where a first-flush system is proposed, details on how the stormwater will be diverted to the drainage system after the first flush is accepted (the first flush to be limited to first 10 mm of storm run off);
- measures proposed for diverting stormwater away from the liquid trade waste generating area; and
- report on other stormwater management options considered and why they are not feasible.

5.1.2.4 Discharge of contaminated groundwater

Similar to stormwater, discharge of groundwater or seepage water to a sewerage system is prohibited under clause 137A of the *Local Government (General) Regulation 2005*. Accordingly, groundwater extracted during construction activities (for example from building/road construction, vacuum excavation, mining/exploration works, etc.) is not permitted to discharge into council's sewerage system directly or indirectly.

However, groundwater previously contaminated by human activities (such as service station remediation sites) may be considered for discharge to the sewerage system. Limited quantities of groundwater from remediation projects may be accepted under controlled conditions after appropriate pre-treatment, for a limited period.

5.1.2.5 Discharge of Landfill leachate

Singleton Council does not accept discharge from municipal waste landfills to the sewerage system.

5.1.2.6 Discharge from float tanks

The discharge of float tank water into a council's sewerage system is not permitted.

Float tanks, often referred to as floatation pods, iso-pods (isolation tank), sensory deprivation systems, or REST tanks (restricted environmental stimulation therapy tanks) are typically small, enclosed pods containing about 1,000 litres of water. Float tanks are generally used in some health retreats and fitness centres. This water usually contains large quantities of Epsom salts (300–700 kg of magnesium sulphate), resulting in total dissolved solids concentration up to 700,000 mg/L. It is normally heated to around 35°C.

Discharge of such water to sewer is not permitted due to potential adverse impacts associated with the high salt content on the sewer infrastructure and treatment processes. It is also not appropriate to dispose of such waste to septic tanks or on-site soak wells.

If wastewater is proposed to be transported away for off-site management, council will request the operator of such facilities to provide the details of liquid waste transporters and written verification from the receival facilities acknowledging and agreeing to receive such wastewater

5.1.2.7 Discharge from service station forecourts and other refuelling points

New Premises

The discharge of wastewater including run-off from service station forecourts and other refuelling points (such as at bus depots, etc.) is not permitted. Refer to NSW EPA Practice Note, *Managing Run-off from Service Station Forecourts*, June 2019, for information on managing such wastewater

Existing premises

The discharge of wastewater from existing service stations and other refuelling areas may be permitted, provided appropriate pre-treatment is provided and the requirements are adhered to (such as having a manual activated pump, an inspection aperture, etc.).

If a refuelling area is refurbished, then the discharge from this area must be disconnected from the sewerage system.

5.1.2.8 Discharge from liquefaction and/or pulverisation of solid waste by physical or chemical processes

The wastewater arising from liquefaction or pulverisation of solid waste by physical means, such as pulping or macerating, or by chemical means, such as dissolving solid waste in highly acidic or alkaline solutions, is not permitted to be discharged to the sewerage system. The following sections describe examples of such processes.

Macerators

Macerators and any similar devices used for pulverising of solid waste are not permitted to be connected to council's sewerage system. Solid waste includes, but is not limited to, sanitary napkins, placenta, surgical waste, disposable nappies, mache bedpan/urine containers, food waste, disposable products and animal waste (dog/cat faeces, cat litter).

Food waste disposal units

Discharge of waste from food waste disposal units (also known as in-sink food waste disposers or garbage grinders) in non-residential premises is not permitted, unless an approval is in place for an existing premises.

Alkaline hydrolysis waste

This is a process where human or animal tissue is broken down using alkaline solutions at elevated temperatures and pH. The process may be used in animal care facilities, veterinary premises, animal research laboratories, funeral parlours, etc. The generated wastewater is of a high strength and may result in high loadings on the sewerage system. Accordingly, the wastewater generated by this process is not allowed to be discharged to the sewerage system.

Such wastes must be removed from the premises by a licenced waste haulage contractor and not discharged to the sewerage system directly or indirectly.

5.1.2.9 Discharge of disposable waste products

Any disposable solid products including those marketed as 'flushable' (such as wet wipes, cleaning wipes, colostomy bags, cat litter, etc.) are not permitted to be discharged to the sewerage system. Contrary to manufacturers' claims, flushable wet wipes do not breakdown in the sewerage system in a similar way to a toilet paper and may cause blockages within the discharge premises or in the council's sewerage system, causing raw sewage overflow to the environment.

5.1.2.10 Use of additives in pre-treatment systems

The use of bacterial, enzyme and/or odour-controlling agents in pre-treatment equipment (such as in grease arrestors) is prohibited unless specifically approved by Council with the department's concurrence.

5.1.2.11 Discharge from solid food waste processing units (digesters/composters)

Some solid waste processing equipment (such as composters, digesters, etc.) on the market use different treatment technologies to reduce the volume of waste. These techniques may include thermal treatment and aerobic digestion.

The quality of wastewater from this equipment depends on the type of solid waste fed into it and the effectiveness of the design of the on-site pre-treatment, hence frequent sampling will be required for monitoring and charging purposes. Sampling needs to be undertaken by either a council officer or an independent party acceptable to council.

As these systems can be difficult to assess and maintain, these will be considered on a case-by-case basis.

5.1.2.12 Food waste disposal units

The use of food waste disposal units (also known as in-sinkerators, in-sink food waste disposers, or garbage grinders) is not permitted. Existing installations in hospitals and nursing homes may be permitted, provided that liquid trade waste is discharged through an adequately sized grease arrestor. For existing premises, a food waste disposal charge will be levied based on the number of beds in the hospital or nursing home.

If the hospital or nursing home kitchen is refurbished, the food waste disposal unit must be removed.

5.1.2.13 Devices that macerate or pulverise waste

Macerators and any other similar devices that are used for pulverising of solid waste are not authorised to connect to Council's sewerage system. Solid waste includes, but is not limited to, sanitary napkin, placenta, surgical waste, disposable nappy, mache bedpan and urine containers.

Therefore Council will not accept any discharges from such devices to its sewerage system.

5.1.2.14 Use of additives in pre-treatment systems

Council does not allow solvents, enzymes, bioadditives, and odour control agents to be used in pre-treatment systems (except neutralising chemicals designated for the re-treatment) except by specific written application and subsequent approval.

5.1.3 Framework for regulation of liquid trade waste

5.1.3.1 Application Procedures

To obtain Council's approval to discharge liquid trade waste to Council's sewerage system, a discharger must lodge an application in writing. Application forms are available from Council. If a person wishes to discharge liquid trade waste to the sewerage system but is not the owner of the premises, the person must obtain the owner's consent to the application.

The applicant must provide the following information:

- site owner's full name, address, contact telephone number;
- address of the business/industry where discharge to the sewerage system will occur;
- name of contact person for the premises and telephone contact for the business/industry;
- type of process/activity generating the liquid trade waste;
- normal hours of business operation;
- rate of discharge, including:
    - the average per day, maximum per day and per hour, and
    - hours of the day during which discharge will take place
- characteristics of wastes, including:
    - nature of source

    - expected maximum and average concentrations of pollutants

- chemicals to be used – supply Safety Data Sheets;
- details of any proposed pre-treatment facilities, location and site plan. Details should include:
    - pre-treatment process details;
    - internal wastewater drainage;
    - pump size;
    - rising main size, length and profile;
    - system operational characteristics;
    - operational procedures;
    - provisions for sampling and flow measurement, where required; and
    - proposed connection point to the sewerage system.
- flow diagram and hydraulic profile of proposed liquid trade waste pre-treatment facilities;
- maintenance schedule for pre-treatment equipment, including contractor's details;
- stormwater drainage plan;
- measures for prevention of stormwater ingress into the sewerage system;
- location, nature and chemical composition of all substances stored/used on site;
- justification for disposing of the waste into the sewerage system over other possible options (if any);
- methods of disposal for other wastes that are not discharged to the sewerage system;
- any relevant environmental impact assessments; and
- any additional information as requested by Council.

Council may, under section 86 of the *Local Government Act 1993*, request an applicant to provide more information to enable it to determine the application.

5.1.3.2 Approval of applications

Where an application is approved, Council will notify the applicant as soon as practical of the approval and any conditions of the approval. The duration of the approval will be as stated in the approval. In cases where Council requires a discharger to enter into a liquid trade waste services agreement, Council will issue a deferred commencement

approval under section 95 of the *Local Government Act 1993* requesting the discharger to do so within the time specified in Council's letter. In such cases, the approval will not be operative until the agreement has been executed by the discharger.

An applicant may make a minor amendment or withdraw an application before it is approved by Council. An applicant may also apply to Council to renew or extend an approval, in accordance with section 107 of the *Local Government Act 1993*.

If an application is refused, Council will notify the applicant of the grounds for refusal.

An approval to discharge liquid trade waste to Council's sewer is not transferable. A new application must be lodged and a new approval obtained if there is a change of the approval holder or the activity. Council must be notified of change of ownership and/or occupier in all cases, whether a new approval is required or not, to allow updating of records.

5.1.3.3 Concurrence

If Council supports an application and has a notice stating that concurrence of the Secretary, DPE, can be assumed for the waste relevant to the application, Council will approve the application. Otherwise, Council will seek concurrence in accordance with the requirements of section 90(1) of the *Local Government Act 1993*. DPE – Water provides concurrence on behalf of the Secretary, DPE.

Liquid trade waste discharges are divided into four classifications for the purpose of the concurrence process:

- Concurrence Classification A – liquid trade waste dischargers for which Council has been authorised to assume concurrence to the approval subject to certain requirements
- Concurrence Classification B – liquid trade waste dischargers whereby Council may apply for authorisation to assume concurrence to the approval subject to certain requirements
- Concurrence Classification S – the acceptance of septic tank, pan waste and ship-to-shore pump-out. Singleton Council does not accept waste defined as Classification S
- Concurrence Classification C – all other liquid trade waste dischargers that do not fall within Concurrence Classification A, B or S, and therefore require Council to forward the application for concurrence.

All councils have been authorised to assume concurrence for Concurrence Classification A liquid trade waste discharges. These are listed in Table 5-3 and Council will not need to seek concurrence for approval of trade waste applications for these activities.

Commercial Retail Food Preparation Activities	Other Commercial Activities
Bakery (retail)	Animal wash (pound, stables, racecourse, kennels, mobile animal wash and veterinary with no X-ray)
Bed and Breakfast (<10 persons)	Beautician
Bistro	Boiler blowdown
Boarding house/hostel kitchen	Car detailing
Butcher shop (retail)	Cooling tower
Café/coffee shop/coffee lounge	Craft activities (making of clay pottery, ceramics, cutting and polishing of gemstones or making of jewellery at clubs, cottage industries)
Canteen	Dental surgery/dental specialist
Cafeteria	Dental technician
Chicken/poultry shop (only fresh chickens/game sold)	Doctor's surgery, medical centre - plaster casts (no X-rays)
Chicken/poultry shop (retail BBQ/charcoal chicken)	Florist
Club (kitchen wastes)	Funeral parlour, morgue
Commercial kitchen/caterer	Hairdressing (includes barbers)
Community hall/civic centre	Jewellery shop
Day care centre	Laboratory (pathology/analytical)
Delicatessen	Laundry or laundromat (coin operated)
Doughnut shop	Lawnmower repairs
Fast food outlet (McDonalds, KFC, Burger King, Pizza Hut, Red Rooster, etc.)	Mechanical repairs/workshop
Fish shop (retail – fresh and/or cooked)	Mobile cleaning units
Food caravan	Optical service
Fruit and vegetable shop (retail)	Pet shop (retail)
Function centre	Photographic tray work/manual development
Hotel	Plants retail (no nursery)
Ice cream parlour	School (Primary and Secondary)
Juice bar	Stone working
Mixed business	Swimming pool/spa/hydrotherapy
Motel	Vehicle washing (by hand/wand, automatic car wash, external truck wash or underbody/engine degrease only)
Nightclub	Venetian blind cleaning
Nursing home kitchen	Veterinary /animal kennels with X-ray
Nut shop	Waterless minilab
Patisserie	
Pie shop	
Pizza shop	
Restaurant	
Salad bar	
Sandwich shop	

Commercial Retail Food Preparation Activities	Other Commercial Activities
School canteen	
Supermarket (with butcher/delicatessen/ seafood/or charcoal chickens)	
Take-away food outlet	

Table 5-3 – Liquid trade waste discharges with automatic assumed concurrence

Notes on ***Table 5-3***: The volume of liquid trade waste must not exceed 5 kL/d or 1000 kL/a except in the case of commercial retail food preparation activities, where up to 16 kL/d is included in this category. If the waste discharged to the sewer exceeds these volumes, the application must be treated as Concurrence Classification B. Discharges over 20 kL/d must be treated as Classification C.

5.1.3.4 Discharge Factors

On approval of a site's discharge, Council sets the site's Sewer Discharge Factor (SDF) and Trade Waste Discharge Factor (TWDF). These are an estimated percentage of all wastewater discharged from the site, based on water consumption, and are used to determine the site's sewer and trade waste charges for a period.

In most circumstances, Council uses the suggested SDF and TWDF provided by the Department of Planning and Environment on the DPE's secure website to set the discharge factors for billing purposes.

However, in some circumstances a customer may request to use site-specific SDF and/or TWDF by applying in writing to Council. The site-specific factors can be developed by:

- carrying out a water balance assessment taking into account any additional water supply sources and the volume of water not discharged to the sewerage system;
- using check meters installed on dedicated water supply lines for liquid trade waste areas and applying a suitable factor to the water consumption recorded by the check meter;
- using check meters installed on water supply lines for areas where water is not discharged to the sewerage system; or
- measuring the actual flow to the sewerage system.

Customers who elect not to use the guidance SDF and/or TWDF will need a suitably qualified person to develop site-specific factor(s) using one of the methods above at their own cost. All supporting information is to be provided to Council for approval of the site-specific factor(s) prior to it being used for billing purposes. Site-specific factors will be reviewed on an at least five-yearly basis, or upon change of activities, to ensure currency. In some circumstances Council may require the Customer to install measures to verify discharges at the Customers cost.

The above also applies to complex developments where there is no suitable standard SDF and/or TWDF.

Site-specific SDF and TWDF will only be used for the property they are developed.

5.1.3.5 Liquid trade waste charging categories

Four classifications of liquid trade waste have been established for concurrence purposes, Classification A, B, C and S. For trade waste charging purposes there are also four charging categories, Category 1, 2, 2S and 3.

Figure 1 below shows that Classification A dischargers fall into Charging Category 1 or Category 2. Classification B dischargers fall into Charging Category 2, except for a few dischargers with low impact on the sewerage system which fall into Category 1. Classification S dischargers fall into Charging Category 2S. Classification C dischargers fall into Charging Category 3.

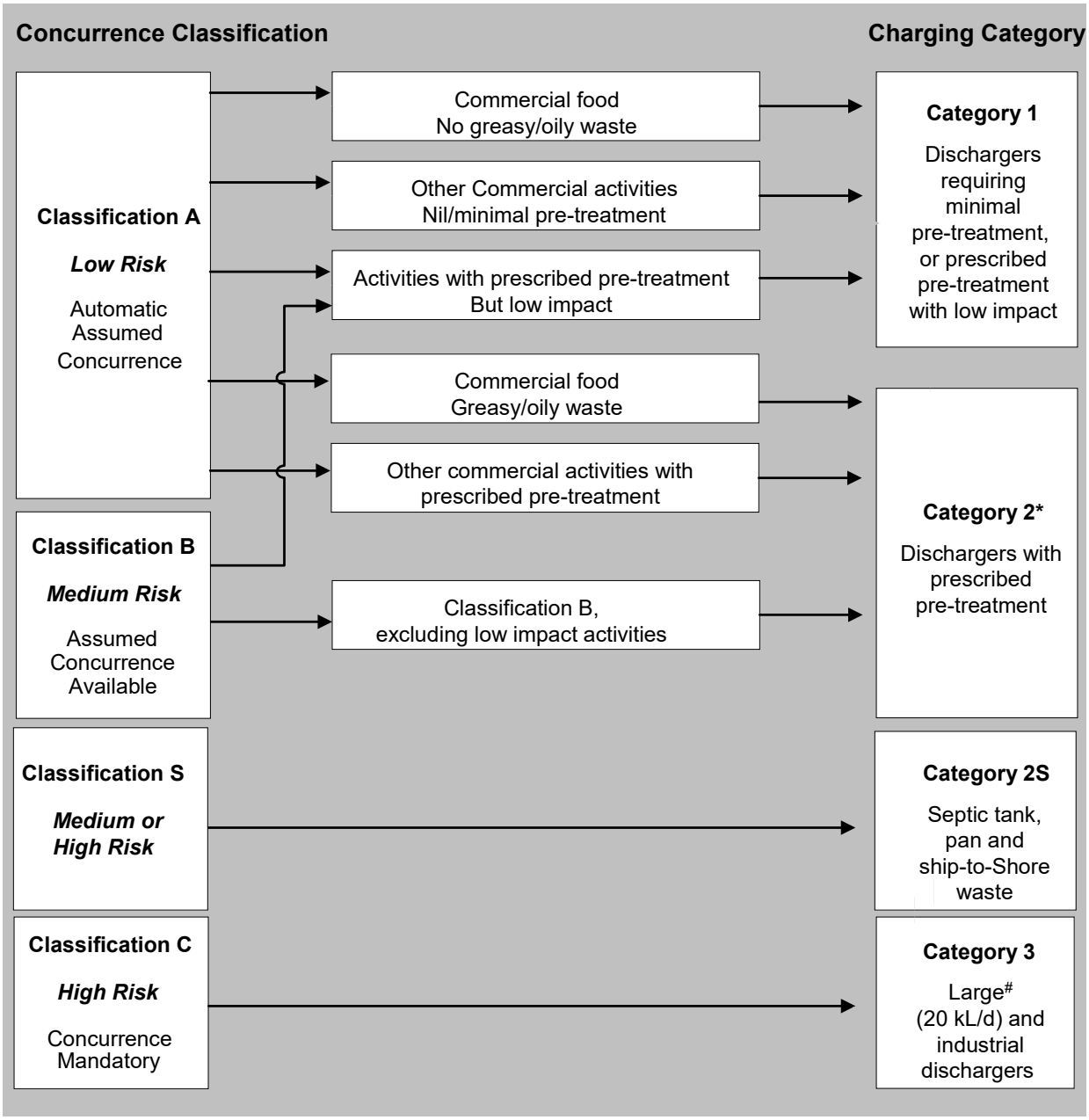

Figure 1 – Charging categories for trade waste

Category 1 Discharger

Category 1 liquid trade waste dischargers are those conducting an activity deemed by Council as requiring nil or only minimal pre-treatment equipment and whose effluent is well defined and of a relatively low risk to the sewerage system. In addition, Category 1 includes dischargers requiring prescribed pre-treatment but with low impact on the sewerage system.

Classification A activities – Commercial retail food preparation activities that do not generate an oily/greasy waste: bakery (only bread baked on-site), bistro (sandwiches, coffee only), café/coffee shop/coffee lounge, canteen, community hall (minimal food), day care centre, delicatessen, fruit and vegetable shop, hotel, ice cream parlour (take away only), juice bar, mixed business, motel, nightclub, nut shop, pizza cooking/reheating (no preparation or washing up on-site, pizza heated and sold for consumption off-site), potato peeling (small operation), sandwich shop/salad bar, take away food outlet.

Classification A activities – Other commercial activities: animal wash, beautician/hairdressing, crafts < 1000 L/d, dental surgery (plaster casts, no X-ray unless digital), doctor's surgery and medical centre (plaster casts, no X-ray), florist, funeral parlour, mobile cleaning units, morgue, jewellery shop, optical service (retail), pet shop, plants retail (no nursery), public swimming pool, photographic (tray work/manual development), venetian blind cleaning, veterinary (no X-ray).

Classification A or B activities – dischargers with prescribed pre-treatment with low impact on the sewerage system: boiler blowdown, cooling tower, industrial boilers, laboratory (analytical/pathology/tertiary institution), laundry, primary and secondary school, vehicle washing.

Category 2 Discharger

Category 2 liquid trade waste dischargers are those conducting an activity deemed by Council as requiring a prescribed type of liquid trade waste pre-treatment equipment and whose effluent is well characterised.

Trade Waste dischargers with prescribed pre-treatment include:

Classification A activities: Premises that prepare and/or serve hot food or foods that generate an oily/greasy waste: bakery (pies, sausage rolls, quiches, cakes, pastries with creams or custards), bistro, boarding house/hostel kitchen, butcher, café/coffee shop/coffee lounge, cafeteria, canteen, fast food outlet, chicken/poultry shop, club, community hall, commercial kitchen/caterer, nursing home, patisserie, supermarket, doughnut shop, fish shop (cooking on-site), function centre, hotel, ice cream parlour, motel, nightclub, pizza cooking, restaurant, sandwich shop/salad bar, take away food outlet.

Other commercial Classification A activities: car detailing, craft activities > 1000 L/d, dental surgery with X-ray, lawnmower repairs, mechanical workshop, stone working, veterinary (with X-ray), waterless mini-lab.

Classification B activities: auto dismantler, bus/coach depot, construction equipment maintenance and cleaning, equipment hire, maintenance and cleaning, glass cutting and grinding, graphic arts, hospital (with or without X-ray), medical centre (with X-ray), optical services (at medical or educational facilities, workshops), oyster processing –

shucking, panel beating, photographic lab, radiator repairer, screen printing, service station forecourt, shopping complex, water wash mini-lab, X-ray radiologist.

Other Classification A activities: fish shop (fresh fish for retail).

Category 2S Discharger

Category 2S dischargers are those conducting an activity of transporting and/or discharging septic tank or pan content waste into the sewerage system. Note that Singleton Council does not accept Classification S waste, however this Category is included for informational purposes.

Trade waste dischargers include the following Classification S activities:

Classification S activities: bus/rail coaches/caravan/motor home/caravan park waste dump points, mooring/marina dump points, pan waste, portable chemical toilet waste, septage, septic tank effluent, ship-to-shore pump-outs (galley waste and toilet waste).

Category 3 Discharger (large or industrial waste dischargers)

Category 3 liquid trade waste dischargers are those conducting an activity which is of an industrial nature and/or which results in the discharge of large volumes (over 20 kL/d) of liquid trade waste to the sewerage system. Any Category 1 or 2 discharger whose volume exceeds 20 kL/d becomes a Category 3 discharger, except shopping complexes and institutions (eg. hospitals, educational facilities, correctional facilities, etc.)

Large trade waste dischargers and other Classification C activities include: abattoir, bakery (wholesale), brewery, cooling towers, cosmetics/perfumes manufacture, dairy processing (milk/cheese/yoghurt/ice cream etc.), food processing (cereals/cannery/condiments/ confectionary/edible oils/fats/essence/ flavours/fish/fruit juice/gelatine/honey/meat/pickles/ smallgoods/tea and coffee/vinegar/yeast manufacture etc.), fruit and vegetable processing, flour milling, glue manufacturer, egg processing, pet food processing, plants nursery (open areas), potato processing, poultry processing, saleyards, seafood processing, soft drink/cordial manufacture, starch manufacture, sugar refinery, tanker washing, tip leachate, transport depot/ terminal, water treatment backwash, wholesale meat processing, winery, wine/spirit bottling.

Dischargers of industrial waste include the following Classification C activities: acid pickling, adhesive/latex manufacture, agricultural and veterinary drugs, anodising, bitumen and tar, bottle washing, cardboard and carton manufacture, carpet manufacture, caustic degreasing, chemicals manufacture and repackaging, contaminated site treatment, cyanide hardening, detergent/soaps manufacture, drum washing, electroplating, engine gearbox reconditioning, extrusion and moulding (plastic/metal), feather washing, fellmonger, felt manufacture, fertilisers manufacture, fibreglass manufacture, filter cleaning, foundry, galvanising, glass manufacture, ink manufacture, laboratories (excluding those in Category 2), liquid wastewater treatment facility (grease trap receival depot and other pump-out waste depot), metal finishing, metal processing (refining/rumbling/ non-cyanide heat treatment/phosphating/ photo engraving/printed circuit etching/sheet metal fabrication etc.), mirrors manufacture, oil recycling (petrochemical) and refinery, paint stripping, paint manufacture, paper manufacture, pharmaceuticals manufacture, plaster manufacture, powder coating,

printing (newspaper, lithographic), sandblasting, slipway, tannery, timber processing (joinery and furniture/plywood/hardwood), textile manufacture (wool dyeing/ spinning/scouring), truck washing (internal), waxes and polishes.

5.1.3.6 Liquid trade waste fees and charges

Council provides sewerage and liquid trade waste services on a commercial basis, with full cost recovery through sewerage and liquid trade waste fees and charges. Council's proposed fees and charges are advertised annually for public comment in its draft Operational Plan.

Note that the fees and charges set out below are for example purposes; Council's Fees and Charges are advertised annually for that year. In addition to the trade waste fees and charges described below, Council may elect to include any trade waste charges shown in Section 8 of the *Liquid Trade Waste Management Guidelines, 2021*.

Liquid trade waste discharged to the sewerage system from industrial, commercial or other non-residential customers can impose significant costs on sewage transport and treatment facilities. To recover these costs and to ensure removal of existing significant cross-subsidies from residential customers, in addition to a two-part tariff with an appropriate sewer usage charge/kL for non-residential sewerage, appropriate fees and charges are levied for liquid trade waste.

Council's liquid trade waste fees and charges may include:

- Application fee
- Annual trade waste fee
- Re-inspection fee
- Trade waste usage charge
- Septic tank and pan waste disposal charge
- Excess mass charges
- Food waste disposal charge
- Non-compliance trade waste usage charge
- Non-compliance excess mass charge and pH charge
- Non-compliance penalty.

Application Fee

The application fee recovers the cost of administration and technical services provided by Council in processing applications for approval to discharge liquid trade waste to the sewerage system. The application fee will be allocated on the basis of the category into which the discharger is classified and reflects the complexity of processing the application. Application fees will be set annually by Council, refer to Council's adopted Fees and Charges.

Annual Trade Waste Fee

The purpose of this fee is to recover the cost incurred by Council for administration and the scheduled inspections each year to ensure a liquid trade waste discharger's ongoing compliance with the conditions of their approval.

As part of an inspection, Council or its agents may undertake monitoring of the liquid trade waste discharges from premises or business. Such monitoring may include but is not limited to, flow measurement and the sampling of the liquid trade waste. Where more than one instance of such monitoring is undertaken by Council, or its agents, in a financial year, the cost involved may be recovered from the discharger.

Annual liquid trade waste fees are determined on the basis of the category of the discharger and are proportionate to the complexity of their inspection and administration requirements. Annual trade waste fees will be set by Council. Where the discharger is required to pay for monitoring this will be charged on the basis of full cost recovery.

Re-inspection Fee

Where non-compliance with the conditions of an approval has been detected and the discharger is required to address these issues, Council will undertake re-inspections to confirm that remedial action has been satisfactorily implemented. Council will impose a fee for each re-inspection. The re-inspection fee will be set annually by Council on the basis of full cost recovery. A re-inspection may include the monitoring of liquid trade waste discharges, the cost of which may be recovered from the discharger.

Trade Waste Usage Charge (Category 2 dischargers)

The trade waste usage charge is imposed to recover the additional cost of transporting and treating liquid trade waste from Category 2 dischargers.

Trade Waste Usage Charge ($) = Q x C2

Where Q = Volume (kL) of liquid trade waste discharged to sewer, and

C2 = Usage Charge as set by Council annually in its fees and charges

Excess Mass Charges

Excess mass charges will apply for substances discharged in excess of the deemed concentrations in domestic sewage shown in ***Table 5-4*** below. For excess mass charge calculation, equation 1 below will be applied.

Substance	Concentration (mg/L)
Biochemical Oxygen Demand (BOD_5)	300
Suspended Solids	300
Total Oil and Grease	50
Ammonia (as Nitrogen)	35
Total Kjeldahl Nitrogen	50
Total Phosphorus	10
Total Dissolved Solids	1000
Sulphate (SO_4)	50

Table 5-4 – Deemed concentration of substances in domestic sewage

Equation 1: Liquid Trade Waste Excess Mass Charge ($) = $\frac{(S-D)\times Q\times U}{1{,}000}$

Where: S = Concentration (mg/L) of substance in sample.

D = Concentration (mg/L) of substance deemed to be present in domestic sewage.

Q = Volume (kL) of liquid trade waste discharged to the sewerage system.

U = Charging rate ($/kg) for discharge of substance to the sewerage system.

Charging rates (U) used in equation (1) are as shown in Council's Operational Plan.

With regard to BOD, equation (1) applies for BOD_5 up to 600 mg/L.

If Council approves the acceptance limits for BOD_5 higher than 600mg/L, an exponential type equation will be used for calculation of the charging rate U_e ($/kg) as shown in equation 2. Equation 2 provides a strong incentive for dischargers to reduce the strength of waste. In addition, equation 5 will be used where the discharger has failed to meet their approved BOD limit on two or more instances in a financial year.

U_e is the excess mass charging rate for BOD ($/kg).

Equation 2: $U_e = 2C \times \frac{(\text{Actual BOD} - 300\text{mg/L})}{600\text{mg/L}} \times 1.05^{\frac{(\text{Actual BOD}-600\text{mg/L})}{(600\text{mg/L})}}$

Where C = the charging rate ($/kg) for BOD_5 600mg/L.

Actual BOD = the concentration of BOD_5 as measured in a sample

Food Waste Disposal Charge

Where Council has permitted the use of a food waste disposal unit for an existing hospital, nursing home or other eligible facility, the following additional food waste disposal charge will be payable annually.

Food Waste Disposal Charge ($) = B x UF

Where B = Number of beds in hospital or nursing home.

UF = Annual charging rate ($/bed) for a food waste disposal unit at a hospital or nursing home.

Non-compliance Charges

Category 1 and 2 Dischargers - If the discharger has not installed or maintained appropriate pre-treatment equipment, the following trade waste usage charges will be applied for the relevant billing period:

Category 1 and 2 Discharger - $19.00/kL (2021/22) as set annually in Council's Fees and Charges

Category 3 Discharger - Non-compliance pH charge

Equation 3 is used for waste with pH being outside the approved range. This equation provides an incentive for dischargers to apply appropriate pH correction so their waste remains within the approved pH limits. Council may require industrial and large dischargers to install and permanently maintain a pH chart recorder or data logger as control of pH is critical to minimising odour and corrosion problems in the sewerage system.

Equation 3: Charging rate for pH where it is outside the approved range for the discharger =

$K \times (\text{actual pH} - \text{approved pH}) \times 2^{(\text{actual pH} - \text{approved pH})}$

Where K = pH coefficient = 0.46 (2021/22) as set annually in Council's Fees and Charges

Non-compliance Excess Mass Charges

Where a discharge quality fails to comply with the approved concentration limits of substances specified in Council's approval conditions (or the acceptance criterion listed in Council's trade waste policy), Council incurs additional costs in accepting and treating that waste. Council may also face problems with the effluent and biosolids management.

In order to recover Council's costs, equation 4 shall apply for non-compliance excess mass charges, except for BOD where equation 5 shall apply.

Equation 4: Non-compliance Excess Mass Charges ($) =

$$\frac{(S-A)\,x\,Q\,x\,2U}{1{,}000}+\frac{(S-D)\,x\,Q\,x\,U}{1{,}000}$$

Where S = Concentration (mg/L) of substance in sample.

A = Approved maximum concentration (mg/L) of pollutant as specified in Council's approval (or liquid trade waste policy).

Q = Volume (kL) of liquid trade waste discharged for the period of non-compliance.

U = Excess mass charging rate ($/kg) for discharge of pollutant to sewerage system, as shown in Council's Annual Management Plan.

D = Concentration (mg/L) of substance deemed to be present in domestic sewage.

Non-compliance Excess Mass Charges for BOD

If a discharger has failed to meet the approved maximum concentration of BOD on two or more instances in a financial year, the non-compliance excess mass charging rate for BOD U_n will be levied on the basis of equation 5:

U_n is the BOD non-compliance excess mass charging rate.

Equation 5: U_n =

$$2C\,x\,\frac{(A-300mg/L)}{600mg/L}\,x\,1.05^{\frac{(A-600mg/L)}{600mg/L}}+4C\,x\,\frac{(Actual\ BOD-A)}{600mg/L}\,x\,1.05^{\frac{(Actual\ BOD-A)}{600mg/L}}$$

Non-compliance Penalty

The non-compliance penalty covers instances where Council may seek compensation for its costs relating to legal action, damage to infrastructure, incurred fines and other matters resulting from illegal, prohibited or unapproved liquid trade waste discharged to the sewerage system.

Responsibility for Payment of Fees and Charges

Property (land) owners are responsible for the payment of fees and charges for water supply, sewerage and liquid trade services provided by Council. This includes property owners of marinas, caravan parks, etc., if a dump point located at their premises is connected to the sewerage system. Where another party (lessee) leases premises any reimbursement of the lessor (property owner) for such fees and charges is a matter for the lessor and the lessee.

All dischargers of liquid trade waste to Council's sewerage system should be aware that they are subject to prosecution and imposition of fines under the *Local Government Act 1993* and the *Protection of the Environment (Operations) Act 1997* and Regulations. In addition to fines, Council may recover costs of damages and fines.

Charging Category	Application Fee	Annual Non-Residential Sewerage Bill With Appropriate Sewer Usage Charge/kL	Annual Trade Waste Fee	Re-Inspection Fee (when required)	Trade Waste Usage Charge/Kl	Septic Waste Disposal Charge	Excess Mass Charges/kg	Non-Compliance Trade Waste Usage Charge/kL	Non-Compliance Excess Mass/kg and pH Charges/kL (if required)
1	Yes	Yes	Yes	Yes	No	No	No	Yes	No
2	Yes	Yes	Yes	Yes	Yes	No	No	Yes	No
2S	Yes	Yes	Yes	Yes	No	Yes	No	No	No
3	Yes	Yes	Yes	Yes	No	No	Yes	No	Yes

Table 5-5 – Summary of trade waste fees and charges incurred by the discharger as a result of an illegal liquid trade waste discharge

5.1.3.7 Risk Assessment and ranking

Council will carry out inspections of premises of all liquid trade waste dischargers and their treatment facilities according to a risk-based approach to Council's sewerage network and treatment plant. These risk categories are based on the complexity and impact of the discharge, and are:

Low Risk	Classification A	2-yearly inspections, minimum
Medium Risk	Classification B	Annual inspections, minimum
High Risk	Classification C	Quarterly inspections

If a site is considered to pose an increased risk than its default Classification would generally indicate, such as by being subject to non-compliance or reinspection fees more than once in a calendar year, Council may at its discretion increase the Risk category. This will result in an increase in frequency of compliance inspections, and therefore cost to the customer.

Similarly, Council may reverse a previously increased Risk category if the customer demonstrates willing compliance over a two year period of increased inspections.

The customer will be informed via letter of any change to its default Risk category.

5.1.3.8 Monitoring

Council will carry out inspections of the premises of all liquid trade waste dischargers and their treatment facilities at least once per annum. Inspections of commercial premises preparing hot food may be carried out at least four times per annum. Monitoring of the large and industrial dischargers is to be carried out as specified in the approval conditions.

The applicant may be required to monitor the liquid trade waste discharge as a condition of an approval or agreement. They may also be required to pay for any sampling and testing of liquid trade waste undertaken by Council.

For this purpose, an inspection/sampling point, where the waste can be inspected and sampled, will be specified in the approval and/or agreement. This point will normally be located after the pre-treatment facility. The discharger may need to install a suitable method of flow measurement.

Council may require the discharger to:

- install a permanent primary measurement device;
- measure the volume and flow rate using the permanently installed flow measurement system (such as a flow metering system);
- install a flow measurement device on a temporary basis and obtain enough data to determine a basis for assessing the flow rate and volume; and/or
- provide a system which allows obtaining a flow weighted composite sample.

Testing of samples is to be undertaken by a NATA-registered or other laboratory recognised by DPE – Water to ensure reliable and accurate results. Where the discharger is sampling the effluent, Council may randomly take duplicates to confirm the waste characteristics.

5.1.3.9 Liquid trade waste services agreement

In addition to its approval under the *Local Government Act 1993*, Council may require certain dischargers, including those who wish to discharge liquid trade waste in large volumes (discharge >20 kL/d) or industrial waste (Concurrence Classification C discharges) to execute a liquid trade waste services agreement. The agreement will set out the conditions associated with the discharge and execution of the agreement will be a condition of the approval issued by Council. The conditions will be binding on the applicant and the Council. The agreement will be for a period of up to five (5) years. No discharge is to be made to Council's sewerage system until an agreement or an interim agreement has been executed.

Provision can be made in the agreement for (in addition to Council's approval conditions):

- additional conditions for discharge of liquid trade waste;
- cancellation of the agreement and/or order to cease the discharge if the discharger is found to be in breach of the agreement or the liquid trade waste

approval or, in the opinion of Council, the waste is adversely affecting the sewerage system or the environment;

- entry by Council officers to inspect the liquid trade waste collection, treatment, monitoring and disposal systems;
- the applicant to notify Council in advance of any changes that may affect the quality and quantity of the liquid trade waste; and
- the amount of bond/security to be lodged with Council prior to discharging to the sewerage system.

5.1.3.10 Enforcement of approvals and agreements

Failure to obtain Council's approval to discharge liquid trade waste into the sewerage system, or failure to comply with the conditions of the approval is an offence under s626 and s627 of the *Local Government Act 1993*. In addition, these offences are prescribed as penalty notice offences under the Act and Council may issue a penalty notice to such discharger.

Furthermore, sections 628 and 634 to 639 list other offences related to water, sewerage and stormwater drainage.

Polluting of any waters by a discharger of liquid trade waste who does not have a Council approval or who fails to comply with the conditions of the approval is guilty of an offence under section 120 (1) of the *Protection of the Environment Operations Act* 1997. In addition, under section 222 of this Act, Council may issue a penalty notice to such a discharger.

Any person who fails to comply with the terms or conditions of a liquid trade waste services agreement (i.e.. there is a breach of the agreement) will be required to indemnify the Council against any resulting claims, losses or expenses in accordance with section 8 of the agreement. Suspensions may also apply and may include a notice to cease the discharge.

5.1.3.11 Modification and revocation of approvals

Council reserves the right to modify or revoke an approval to discharge liquid trade waste to the sewerage system in any of the following circumstances:

- if the approval was obtained by fraud, misrepresentation or concealment of facts;
- for any cause arising after the granting of the approval which, had it arisen before the approval was granted, would have caused the council not to have granted the approval;
- for failure to comply with a requirement made by or under the *Local Government Act 1993* relating to a condition of the approval; and/or
- for failure to comply with a condition of the approval.

5.1.3.12 Prevention of waste of water

Water must be used efficiently and must be recycled where practicable. It is an offence under section 637 of the *Local Government Act 1993* and its Regulation to waste or misuse water.

Dilution of trade waste with water from any non-process source including Council's water supply, bore water, groundwater and/or stormwater as a means of reducing pollutant concentration is therefore strictly prohibited.

5.1.3.13 Effluent improvement plans

Where the existing liquid trade waste discharged does not meet Council's requirements, the applicant may be required to submit an Effluent Improvement Plan setting out how Council's requirements will be met. The proposed plan must detail the methods/actions proposed to achieve the discharge limits and a timetable for implementation of the proposed actions. Such actions may include more intensive monitoring, improvements to work practices and/or pre-treatment facilities to improve the effluent quality and reliability.

5.1.3.14 Due diligence programs and contingency plans

For Concurrence Classification A, a discharger is not required to submit either a due diligence program or a contingency plan.

A discharger may be required to submit a due diligence program and a contingency plan for Concurrence Classification B where it is considered that the discharge may pose a potential threat to the sewerage system. If required, a due diligence program and contingency plan must be submitted to Council within six months and three months respectively of receiving a liquid trade waste approval.

For Concurrence Classification C, a discharger may need to provide a due diligence program and contingency plan to Council within six months and three months respectively of receiving a liquid trade waste approval.

It should be noted that:

- If the discharger has an accredited environmental management system in place, a due diligence program and contingency plan may not be required. However, proof of accreditation must be provided to Council with the application. The Environmental Management Plan (EMP) may not include all necessary provisions in regard to trade waste. In such cases Council may require that a suitable due diligence program and contingency plan be developed and submitted to Council.

- Where Council considers there is potential risk to the sewerage system from a discharge, it may request a due diligence program and contingency plan to be submitted prior to commencing the discharge.

6 Relevant Legislation

Council provides water and sewer services appropriate to the current and future needs of the local community in accordance with relevant Acts, Regulations and standards. Some of the relevant Acts and Regulations are:

- *Local Government Act 1993 and Local Government (General) Regulation 2021*
- *Liquid Trade Waste Management Guidelines, 2021*
- *Protection of the Environment Operations Act 1997*

7 Document Information

Related documents and reference information in this section provides a single reference point to develop and maintain site compliance information.

7.1 Related Documents

Related documents, listed below, are external documents directly related to or referenced from this document.

- Australian Sewage Quality Management Guidelines, June 2012, WSAA
- Practice Note, Managing Run-off from Service Station Forecourts, June 2019, NSW EPA

Related documents, listed in ***Table 7-1*** below, are internal documents directly related to or referenced from this document.

Number	Title
POL/26031	Policy – Sewer Services Policy
09/1474	Trade Waste - Form - Application - Commercial Liquid Trade Waste - Classification A - Template
09/1477	Trade Waste - Form - Application - Commercial Liquid Trade Waste - Classification B or C - Template
13/17926	Trade Waste - Form - Discharge Approval - Template

8 Responsible Officer / Policy Owner

The implementation and ownership of this policy rests with the Liquid Trade Waste Officer, unless appropriately delegated to another officer.

9 Responsibilities

Parties or Persons	Responsibilities
Liquid Trade Waste Officer	• Implement Discharge of Liquid Trade Waste to Sewerage System Policy • Liaise with DPE – Water as required • Review Policy in accordance with Section 12 • Report on liquid trade waste matters to Manager – Water and Sewer
Manager – Water and Sewer	Oversee the implementation of Discharge of Liquid Trade Waste to Sewerage System Policy

It is the responsibility of all Council employees and any person contracted to or acting on behalf of Council to have knowledge of, and to ensure compliance with this policy.

10 Approval

As per cover sheet.

11 Monitoring

This policy will be monitored by the Manager Water and Sewer, unless appropriately delegated to another officer.

12 Review Date

This policy, once adopted, is to remain in force until it is reviewed by Council. This policy is to be reviewed approximately every two (2) years to ensure that it meets legislative requirements.

In accordance with section 165 (4) of the *Local Government Act 1993*, this policy will be reviewed within one year of the election of every new Council.

13 Last Review Date

April 2022

14 Record Keeping, Confidentiality and Privacy

All records received, created or supporting this policy will be kept on Council's Corporate Computer Systems in accordance with *State Records Act 1998, NSW* and will retain confidentiality and privacy in accordance with *Privacy and Personal Information Protection Act 1998, NSW* and Council Policy. Council is required to release certain information in accordance with *Government Information (Public Access) 2009, NSW*.

This policy is to be made available for public viewing as required under the *Government Information (Public Access) 2009, NSW*.

15 Breaches and Sanctions

Any breaches of this Policy will be referred to the General Manager for appropriate action.

16 Document History

The below table provides a summary of changes and amendments to this document.

Version	Date Amended	Author	Comment (e.g. reasons for review)
1	06/11/2000	Liquid Trade Waste Officer	• Initial release
2	05/12/2005	Liquid Trade Waste Officer	• Periodic review
3	16/08/2012	Liquid Trade Waste Officer	• Periodic review
4	19/03/2020	Liquid Trade Waste Officer	• Periodic review • Update to new template
5	18/05/2020	Liquid Trade Waste Officer	• Biennial review • Classification S (septage) excluded from acceptance
6	17/05/2022	Liquid Trade Waste Officer	• Periodic review • Added document history