

Trade Effluent

19th October 2017

Trade Effluent for Open Market

Why

The wholesale Trade Effluent standard is an integral part of Severn Trent wholesale operations and provides further clarification in respect of the Market Codes.

Who

All wholesale Trade Effluent activities within Severn Trent, in relation to market opening, will be managed in accordance with this standard and its supporting processes, practices and procedures. This standard applies to, and is the responsibility of, all Commercial Waste staff.

Scope

The objective of this standard is to set out the company's approach to wholesale Trade Effluent activities. Severn Trent need to ensure that they understand the requirements for the wholesale Trade Effluent activities, regularly measure and report compliance and ensure that any corrective actions are implemented where the desired level of performance is not achieved.

1 Market Codes

The latest version of Market Codes can be found on www.mosl.co.uk/open-water/codes (30/09/15)

Severn Trent will comply with the service level agreements as set out in the Market Architecture Plan (MAP).

1.1 Trade Effluent enquiry received by Severn Trent (process G1)

Upon receipt of a Trade Effluent enquiry that is listed as being in scope for this process, either from a Retailer or a Non-Household customer, Severn Trent will make a substantive response to the party who submitted the enquiry within 10 business days of receiving the enquiry, sending a copy of the response to the Retailer where the enquiry came directly from the Non-Household customer.

Enquiries that are in scope for this process include

- Details or processing of trade effluent consents
- Quality and Analytical or Monitoring information
- Impacts on Wholesaler network from Trade Effluent discharges
- Consent Register
- Unconsented Trade Effluent discharges
- General direct enquiries to Commercial Waste staff
- Enquiries from statutory bodies
- Pollution incidents
- Enforcement activity

Where Severn Trent receives any Trade Effluent enquiry that is out of scope (e.g. billing or financial enquiries) directly from a Non-Household customer, and that customer has already selected a Retailer, we will redirect the customer to contact their Retailer without delay. If the Non-Household customer has not selected a Retailer, Severn Trent will request the Non-Household customer to do so.

1.2 Application for Trade Effluent Consent (process G2)

ALL applications for Consent to discharge any type of Trade Effluent must be made on standard G/02 forms, which have been fully completed. Applications made using any other type of form will be rejected.

Note: Severn Trent are not offering discontinuations. Consequently, the reference to reactivation has been removed from this heading.

Note: Severn Trent will not issue Consents for discharges to public surface water sewers. Surface water sewers are designed to convey un-contaminated surface water to the nearest watercourse and therefore process effluents should be Consented and discharged to the public foul water sewer only.

This section of the standard only applies to applications that are for a proposed discharge period of greater than 6 months in duration.

Where Severn Trent receives an application for a Trade Effluent Consent directly from a Non-Household customer, and that customer has not already selected a Retailer, the application will be rejected and the Non-Household customer will be asked to select a Retailer.

Upon receipt of a Trade Effluent Consent application from a Retailer, or a Non-Household customer who has selected a Retailer, Severn Trent will notify the Retailer within 2 business days of receipt if it has been received from the Non-Household customer, and will then determine if the application is sufficiently complete.

The Non-Household Customer and the Retailer must both have signed the form (actual or electronic signatures are acceptable). Consent applications made using scanned copies of the G/02 are acceptable.

If the application is not sufficiently complete, Severn Trent will provide the applicant with an explanation of what further information is required, within 5 business days of receipt of the application. Severn Trent will provide the Retailer with a copy of any correspondence to the Non-Household customer.

Severn Trent will acknowledge receipt of a sufficiently complete application within 5 business days of receipt of the application.

Severn Trent will, where necessary, refer applications to any appropriate agency within a 2 month period beginning on the calendar day after receipt of the application. Severn Trent will also notify the Retailer and Non-Household customer, if the originator of that referral, and will provide updates on any communications or progress regarding that referral.

Severn Trent may request further information via the Retailer, but may also contact the Non-Household customer directly if necessary, and subsequently inform the Retailer.

Severn Trent may make a request for a site visit via the Retailer, or may contact the Non-Household customer directly, after asking the Retailer for their permission. If a site visit is carried out as part of the consent application process, the Retailer will receive copies of any subsequent correspondence.

If there are no material omissions identified in the Trade Effluent Consent application, Severn Trent will provide an indicative, non-binding decision on the application within 30 business days of receipt of the application, unless the application has been referred to an appropriate agency.

If Severn Trent are unable to make a final decision within 2 months of receiving the application due to circumstances other than awaiting the outcome of a referral from an appropriate agency, a letter may be issued, explaining the reason for the delay in determining the application. The Non-Household customer may appeal our actions or omissions. Severn Trent will work with the Retailer to ensure that any necessary notices or other information are shared with each other and the Non-Household customer in respect of that appeal. Additionally, the Market Operator will be updated if there is any change in the situation.

Unless a referral or notification of delay has been made, Severn Trent will make a final decision on the application within 2 months, beginning on the calendar day after the date the application was submitted. In doing so, Severn Trent will notify the Retailer, Non-Household customer, landlord, any known prospective occupier and consultees previously notified of that final decision on whether a consent to discharge has been issued.

Where an application is rejected, the reason for the rejection will be provided.

Severn Trent will notify the Market Operator within 2 business days of granting Trade Effluent Consent or, if later, within 5 business days of Registration of Supply Point.

1.3 Variation of Trade Effluent Consents (process G3)

Severn Trent Water may vary a Trade Effluent Consent under section 125 of the Water Industry Act 1991 at any time it considers necessary to do so in order to provide proper protection for persons likely to be affected by the discharges. The Non-Household customer or the Retailer on behalf of its Non-Household Customer, may also request or agree to a Variation to an existing Trade Effluent Consent at any time. Severn Trent Water may wish to Vary a Trade Effluent Consent for any reason including those listed below:

- reflect changes in customer processes, name and ownership
- allow the management of available treatment capacity
- respond to legislative or regulatory change
- to manage unused capacity at individual customers
- in response to change of ownership, process modification, regulatory or legislative change within sewage works catchments
- in response to changes in sewage treatment processes, regulatory or legislative change
- to remedy problems not foreseen when the Consent was issued
- where existing limits do not reflect the normal quality of discharges which are otherwise satisfactory

Under section 124 of the Water Industry Act 1991, after a period of two (2) years from the date of a Trade Effluent Consent or any Variation of that Trade Effluent Consent which was not made with the consent of the Non-Household Customer, Severn Trent Water reserves the right to vary the terms of a Trade Effluent Consent, or will review the terms of a Trade Effluent Consent when requested by the Non-Household Customer or the Retailer on behalf of its Non-Household Customer. Certain public agencies may also review Trade Effluent Consents.

Severn Trent will notify the Retailer and Non-Household customer if they wish to initiate a Variation to a Trade Effluent Consent. A reason for the Variation request will be provided as well as an initial view to what the new Variation may be.

If a Non-Household customer initiates a Variation of a Trade Effluent Consent, Severn Trent will notify the Retailer and provide a copy of the request, within 2 business days of receiving the Variation request.

If the Retailer initiates a Variation of a Trade Effluent Consent on behalf of its Non-Household customer, Severn Trent will notify the Retailer and the Non-Household customer of any intention to amend or add to a requested Variation.

Severn Trent will notify the relevant body or agency of a Variation request to a Trade Effluent Consent.

Any Consent variation request made to or initiated by Severn Trent will take the form of a Notice of Direction. The Notice of Direction will be formal notification by Severn Trent of its intention to vary an existing document. Severn Trent will issue letters outlining its proposals before the formal notification is issued. The Consent Direction will not take effect any earlier than 2 months from the issue date of the Notice of Direction. During this 2 month period, representations can be made by the Retailer and/or Non-Household customer against any proposed changes.

Where an appropriate body or agency Directs a Variation to a Trade Effluent Consent, Severn Trent will notify the Retailer and Non-Household customer of that Direction as soon as possible.

Where Severn Trent has varied the consent, the Market Operator will be notified within 2 business days of the Variation taking effect.

If Severn Trent, the Non-Household customer or the Retailer appeal against any Variation to a Trade Effluent Consent, Severn Trent will work with the Retailer to ensure any necessary notices or other information are provided to each other and the Non-Household customer.

1.4 Trade Effluent monitoring (process G4)

1.4.1 Routine sampling visits

Severn Trent will make visits at various times to obtain representative Trade Effluent samples. Frequency of visits will depend upon various factors, such as the nature and volume of Trade Effluent, or risk associated with consent non-compliance.

Severn Trent may make a request for automated sampling and monitoring equipment to be installed, and also equipment for recording data remotely in accordance with the Trade Effluent Consent.

Severn Trent will provide the Non-Household customer with all analytical results for the sample, within 1 business day of the full sample results being made available.

Severn Trent will provide the Retailer with the analytical results obtained for the billable parameters, within 1 business day of the full sample results being made available.

The full results for all analysis carried out on routine samples will only be provided to the Retailer if the Non-Household customer has given written permission (via email or letter) for this to happen.

Severn Trent considers the sample results to be available once all of the sample analysis is complete in Severn Trent systems and the results have been validated by a member of the Commercial Waste team within Severn Trent.

Severn Trent will notify the Market Operator of any change to operational parameters within 2 business days of confirming the changes.

Operational parameters are calculated as the average values obtained from the actual sampling data for a 6-month period. Where O_t is the Chemical Oxygen Demand of the Trade Effluent in mg/l after 1 hour quiescent settlement including any adjustment for Ammonia and S_t is the total Suspended Solids in the Trade Effluent in mg/l at the pH of the Trade Effluent. The operational parameters will be updated in the Market, with an effective date of the start of the 6-month period to which they apply.

Where the operational parameter averages have been agreed with a Non-Household Customer, these will usually be based on the average data obtained from the actual sampling data over a given time period, or based on a short term composite sampling survey.

Any new Discharge Point that is registered in the Market system will have an O_t and S_t value submitted of 75 % of the Consented limit unless satisfactory data is provided to enable another estimate to be created or unless this Discharge Point is a replacement for another. The Operational Parameters will then be reviewed periodically as documented.

1.4.2 Non-routine sampling visits

If there are reasonable grounds to suspect non-compliance with a Trade Effluent Consent, Severn Trent may make non-routine visits to collect samples and monitor discharges.

Severn Trent will provide the Non-Household customer with the sample results within 1 business day of the full sample results being made available. Severn Trent considers the sample results to be available once all of the sample analysis is complete in Severn Trent systems and the results have been validated by a member of the Commercial Waste team within Severn Trent.

The full results for all analysis carried out on non-routine samples will only be provided to the Retailer if the Non-Household customer has given written permission for this to happen.

Severn Trent will inform the Non-Household customer of any follow-up action that is required and will submit a copy of this notice or correspondence to the Retailer.

Severn Trent will otherwise inform the Retailer of any follow-up action that is required within 2 business days of informing the Non-Household customer.

1.5 Discontinuation of Trade Effluent Consent (process G5)

Severn Trent does not offer a discontinuation service for Trade Effluent Consents. As such any Non-Household customer's Trade Effluent consent will be considered a live document until the date that it has been terminated. Therefore, the Non-Household customer's Trade Effluent Consent will be subject to the monitoring, control and enforcement measures as outlined in the Consent document until the date it is terminated.

1.6 Termination of Trade Effluent Consent (process G6)

Severn Trent can initiate the termination of a Trade Effluent Consent, and if it does so, will inform both the Retailer and Non-Household customer of its intention to proceed with the Termination of the Trade Effluent Consent.

If the Retailer or a Non-Household customer requests termination of a Trade Effluent Consent, Severn Trent will acknowledge the request and ensure that both parties are informed.

Any termination request submitted by a Retailer will need to be submitted using the Consent ID on the Trade Effluent Consent documentation. This can be requested by the Retailer from the Non-Household Customer directly or from Severn Trent through the G1 enquiry process.

If Severn Trent decides not to proceed with the termination of the Trade Effluent Consent, the Retailer and Non-Household customer will be notified.

If Severn Trent decides to proceed with the termination of the Trade Effluent Consent, the Retailer and the Non-Household customer will be notified of the effective date of the termination.

Severn Trent will notify the Market Operator within 2 business days of the termination of the Trade Effluent Consent.

1.7 Trade Effluent Meter Activities (Process B12 – B14)

Severn Trent will not repair, replace, test, exchange or install any Non-Household customer private trade effluent meters. This includes private water supply meters.

1.7.1 Installing Private Meters necessary for the calculation of Primary Charges for Trade Effluent Services, or Trade Effluent Services and Foul Sewerage Services.

Severn Trent shall procure that the Non-Household customer notify us of its intention to install a new private meter. The Retailer will then be notified of the Non-Household Customer's intent to install a private meter.

Severn Trent shall procure that within 5 business days of the meter installation, the details of the meter, together with photographic evidence including initial read, shall be provided to us by the Non-Household Customer.

Where the photographic evidence is insufficient, Severn Trent will visit the premises within 5 business days of receipt of the details, to confirm the details provided by the Non-Household customer. It may not be possible to confirm the details if the meter(s) are not fitted in a place that is safe to access.

Within 5 business days of the confirmation of meter details, Severn Trent will inform the Market Operator of the meter details, in accordance with the Market Terms.

Where an earlier site visit was not required to confirm details, Severn Trent will visit the eligible premises within 1 month of its receipt of the meter details from the Non-Household customer, to confirm the meter details provided. It may not be possible to confirm the details if the meter(s) are not fitted in a place that is safe to access.

Any new Private Trade Effluent meter that is submitted to the market for a new Discharge Point or for a Discharge Point where there is no prior volume history will be submitted to the market with a Yearly Volume Estimate of 75 % of the Consented daily volume, multiplied by the days in the year. This can be reviewed by the Retailer as and when necessary. If there are multiple meters, this value will be shared out between the meters.

1.7.2 Testing, repairing, and replacing Private Meters necessary for calculation of Primary Charges for Trade Effluent Services, or Trade Effluent Services and Foul Sewerage Services.

When Severn Trent becomes aware, or is notified by the Retailer, that a private meter is faulty or may not be recording consumption accurately, the Non-Household Customer will be contacted, requesting that they repair, replace, or test the meter as appropriate. A copy of this request will then be sent to the Retailer.

Severn Trent shall procure that the Non-Household Customer arrange for the private meter to be repaired, replaced, or tested as appropriate within an agreed timescale.

In the event of a private meter replacement, Severn Trent shall procure that within 5 business days of the meter replacement, the details of the meter replacement shall be provided by the Non-Household Customer, together with photographic evidence. The photographic evidence must include the Final Read of the old meter, and details of the new meter including the, Initial Read, make and meter serial number(s).

In the event of repair of the Private Meter, Severn Trent shall procure that within five (5) Business Days of the meter repair the Non-Household Customer shall provide us with details of the Meter Read and supporting photographic evidence. The photographic evidence must include the Meter Read and the meter serial number.

In the event of testing of the Private Meter, Severn Trent shall procure that the Non-Household Customer provide us with the test results within twenty (20) Business Days of the testing. We will then contact the Non-Household Customer within five (5) Business Days of that notification advising whether repair or replacement of the meter is necessary.

Where the photographic evidence is insufficient, Severn Trent will visit the premises within 5 business days of the receipt of the details to confirm the details provided by the Non-Household customer. It may not be possible to confirm the details if the meter(s) are not fitted in a place that is safe to access.

The Market Operator will be informed of the meter details within 5 business days of confirmation of the meter details, in accordance with the Market Terms.

Where an earlier site visit was not required to confirm the meter details, Severn Trent will visit the eligible premises within 1 month of its receipt of the meter details, to confirm the details provided. It may not be possible to confirm the details if the meter(s) are not fitted in a place that is safe to access.

1.7.3 Exchanging Private Meters necessary for calculation of Primary Charges for Trade Effluent Services, or Trade Effluent Services and Foul Sewerage Services

Severn Trent shall procure that the Non-Household Customer shall agree the exchange of the Private Meter with ourselves. The Retailer will be notified of the Non-Household Customer's intent to install the meter.

Severn Trent shall procure that within five (5) Business Days of the meter replacement, the Non-Household Customer shall provide the details of the meter removal and installation including meter serial numbers, meter location, Final Read of the old meter and the Initial Read of the new meter (and the dates of the Final Read and Initial Read) and supporting photographic evidence. The photographic evidence must include the Final Read of the old meter, and the Initial Read and the make and serial number(s) of the new meter(s).

Where the photographic evidence is insufficient, Severn Trent will visit the premises within 5 business days of the receipt of the details to confirm the details provided by the Non-Household customer. It may not be possible to confirm the details if the meter(s) are not fitted in a place that is safe to access.

The Market Operator will be informed of the meter details within 5 business days of confirmation of the meter details, in accordance with the Market Terms.

Where an earlier site visit was not required to confirm the meter details, Severn Trent will visit the eligible premises within 1 month of its receipt of the meter details, to confirm the details provided. It may not be possible to confirm the details if the meter(s) are not fitted in a place that is safe to access.

2 Severn Trent Trade Effluent

This section refers to standards Severn Trent hold above the Market Codes.

2.1 Change of company name

Where the Non-Household customer requests a change of name on the Trade Effluent Consent, Severn Trent shall require that the request is formally submitted, and it will then be treated as a consent variation. Severn Trent will require a copy of the certificate of incorporation, issued by Companies House, which shows the previous and new company names and the registered company number or a copy of their company headed letter showing the address, revised name and the company registration number.

2.2 Change of company name and registered Company number

Where the Non-Household customer requests a change of company name and registered company number on the Trade Effluent Consent, Severn Trent will then require that a new application to discharge Trade Effluent be submitted on a G/02 form, under the new company name and number. This will then be treated as a new consent application. Severn Trent will then seek to terminate any existing consents held under the old registered company number.

3. Short Term Discharge Authorisations

Any Trade Effluent discharge application with a proposed period of duration of less than 12 months will be considered as a Short Term Discharge Authorisation.

Those applications for a period of less than 6 months in duration should be submitted by the applicant to Severn Trent directly. These applications will then be processed directly by Severn Trent with any relevant Trade Effluent charges being raised against the applicant.

For applications for a period of less than 6 months where it has been determined that a Mogden charge is required, this charge will again be processed directly by Severn Trent and charges raised against the applicant.

If the application is submitted via a Retailer, the Retailer will be informed that the application will be dealt with by Severn Trent directly with the applicant. If the site has a market eligible SPID, the relevant Retailer will be notified using the G1 process that there will be a Trade Effluent discharge from that SPID for a set duration.

Any application to discharge with a proposed period of duration of greater than 6 months must be submitted via a Retailer. Any relevant charges will then be raised against that Retailer. The Trade Effluent Discharge Point will then be submitted to the Market Operator

4. Unconsented Trade Effluent discharges or Pollution incidents arising from Trade Effluent discharges

In the event of an Unconsented Trade Effluent discharge or a breach of any Trade Effluent Consent limits the Non-Household customer must immediately contact Severn Trent directly via the Emergency contact route. This

is notified in all new Trade Effluent Consent documents. If a Retailer becomes aware of an Unconsented Trade Effluent discharge or a breach of any Trade Effluent Consent limits it should notify Severn Trent immediately.

Severn Trent shall investigate these incidents and if the source is traced back to or has been identified to have originated from a Non-Household Customer the relevant Retailer will be informed within 2 Business days of the cause being confirmed. Severn Trent will only notify the Retailer when there is sufficient evidence that the incident was caused by the Non-Household Customer or if the customer has admitted they were at fault. Severn Trent will copy any correspondence with the Non-Household Customer to the Retailer unless there is to be any Legal action undertaken.

5. Service Request

Any service requested from the Wholesale Scheme of Charges must be submitted by a Retailer using a recognised communication method (i.e. bilateral form sent in electronic or manual format). Any standard request accepted by STW will be deemed authorised by the Retailer, and grants authority to Severn Trent Water to complete any works necessary and any relevant cost charged to the Retailer. Where the work is non-standard, a quotation will be provided prior to the work commencing. Service requests made by telephone will not be accepted.