Water Use

Regulatory Method (WAT-RM-05)

Trade Effluent Discharges to Surface Waters

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Update Summary

Version	Description
v1.0	First issue for Water Use reference using approved content from the following documents: *Trade_Effluent_discharges_to_surface_water.doc*
v1.1	Revised to include references to *WAT-SG-39* & *WAT-SG-41*.
v1.2	Revised *low dilution* text sections 4.1.3, 5.2.1 & 5.3.1
v2.0	New base template applied, links to docs revised for new SEPA website, Nov 2008
v3.0	Revised *Flows & Loads* reference and value (180 l/head/day), text revised (s 5.1.1 para 2 & 3, s 7 para 2), *FRS* now *Marine Scotland*
v4.0	Unpublished – ignored to sync versioning with WAT-RM-03
v5.0	Text added: *Augmenting river flows* (sections 4.2.1 & 5.3.1), NEMS/CLAS requirements for Priority Hazardous Substances (section 7.1.4). Conservation procedure revised (section 5.2.3)
v6.0	Expired CMS links reviewed and updated.
v7.0	Strengthening of wording that SEPA are minded not to authorise discharges where connection to public sewer is possible. Inclusion of mean standards for organic trade discharges.
v8.0	Strengthening of wording in relation to not authorising a discharge

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1. Key Points

This guidance concerns **trade effluent discharges to surface water**. For trade effluent discharges to land please refer to *WAT-RM-06: Regulation of Trade Effluent Discharges to Groundwater*. Separate guidance regarding the discharge of effluent from fish farms is provided in the *Fish Farm Manual*.

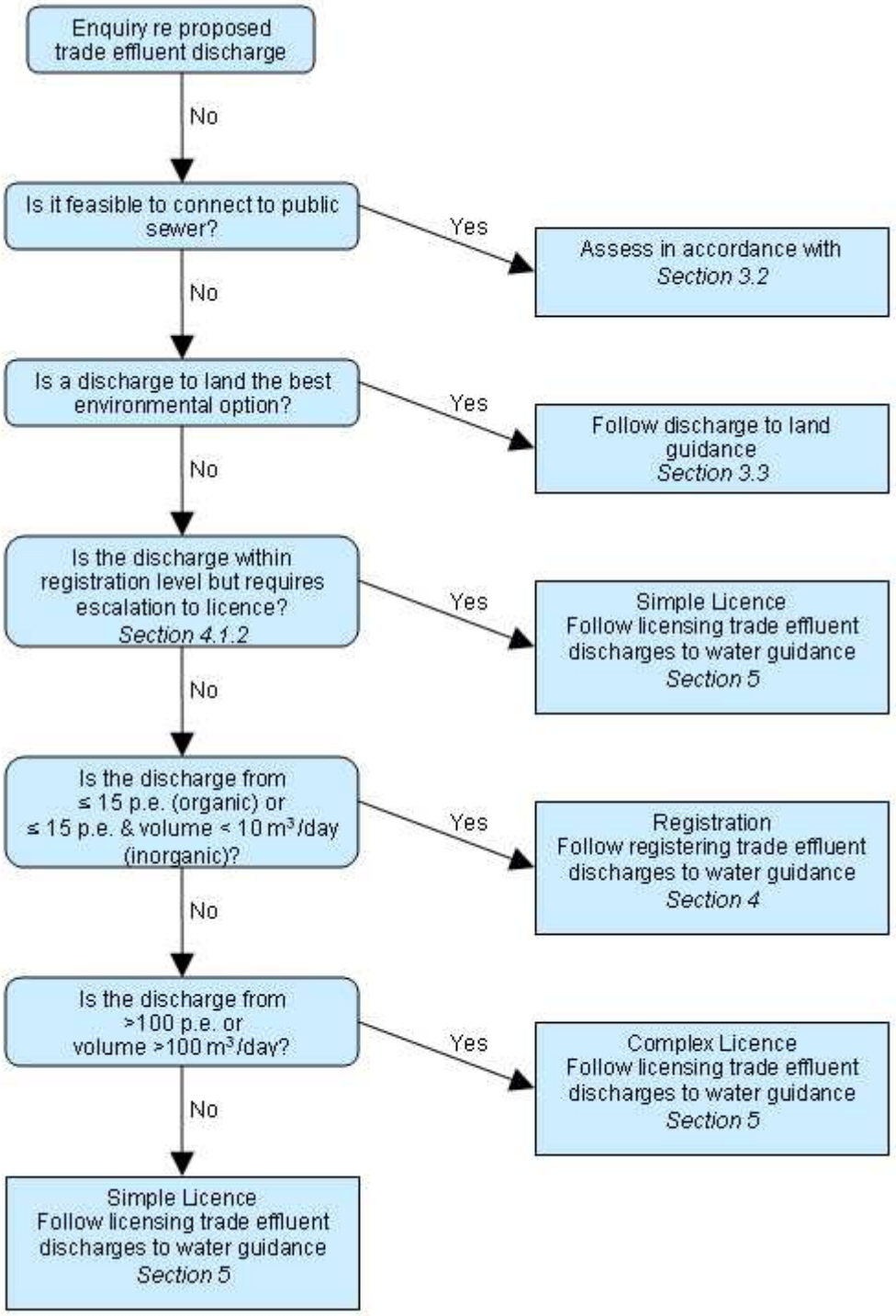
This guidance is designed for use with the trade effluent licence template, *WAT-TEMP-22: Trade Effluent Licence Template*.

For discharges from water treatment works and water supply systems, refer to *WAT-RM-12: Regulation of Discharges from Water Treatment Works* in addition to the guidance in this document, and use the Water Treatment Works licence template, *WAT-TEMP-18: Water Treatment Works Licence Template*.

If the site includes an impoundment or an abstraction, refer to *WAT-RM-01: Regulation of Abstractions and Impoundments* for guidance.

2. Process Flow Summary

Figure 1 Process Flow for Discharge of Trade Effluent to Surface Waters



3. Introduction

3.1 Trade Effluents

The flowchart in Figure 1 details the initial steps which should be followed when receiving a query regarding a proposed trade effluent discharge.

For the purposes of this guidance, trade effluent means effluent arising from a controlled activity but which is not sewage effluent and/or a surface water discharge.

Refer to *WAT-SG-39: Point Source Regime Definitions and Scope* for guidance on:

- Point Source discharges that do not require authorisation.
- Identifying whether a discharge is trade effluent or a surface water discharge.

The composition of trade effluents varies widely depending on the nature of the trade process. The effluent may contain a wide range of pollutants from simple organic matter, silt, chemicals to highly toxic compounds.

Organic discharges are those which primarily contain matter from an animal or vegetable origin and exert a notable biochemical oxygen demand. Such discharges include effluents from the food and drinks industry, vegetable washings, kennel washings and may include a sewage component from factories for example.

Inorganic discharges primarily do not contain matter from an animal or vegetable origin and do not exert a notable biochemical oxygen demand. Such effluent typically arises from mines and quarries, chemical processing and water treatment works.

Trade discharges will be authorised by registration or by a simple or complex licence depending on the type and scale of the discharge (see *Table 1*).

Further detail as to the types of discharge which fall into each authorisation level can be found in the Levels of Authorisation document.

NOTE: Guidance on discharges from fish farms, including marine cages and tank fish farms can be found in the *Fish Farm Manual*.

Table 1 Trade effluent levels of authorisation

Registration	Simple Licence	Complex Licence
Sewage and Organic effluents ≤15 p.e.[1]	Sewage and Organic effluents >15 and ≤100 p.e.[2]	Sewage and Organic effluents >100 p.e.[7]
	Water treatment works discharges[3]	
Cooling water – no chemical addition or Freshwater Fisheries Directive implications	Cooling water with chemical addition or Freshwater Fisheries Directive implications	
	All boiler blow-down[4]	
	All dry docks[5]	
Inorganic effluents and other trade effluents ≤10 m^3/d & ≤15 p.e.	Inorganic effluents[6] and other trade effluents inc mines & quarries & leachate from landfills ≤10 m^3/d & >15 p.e. 10-100 m^3/d & ≤100 p.e.	Inorganic effluents[8] and other trade effluents inc mines & quarries & leachate from landfills 10-100 m^3/d & >100 p.e. >100 m^3/d

Notes:

1. Discharges from commercial shellfish depuration tanks and holding tanks are authorised by Registration.

2. Sewage and organic effluents which prior to treatment have an organic loading greater than 15 and less than and including 100 population equivalents.
These effluents typically originate from sewage treatment, food and drinks processing, brewing and distilling.

3. The guidance document Regulating Discharges from Water Treatment Works and Water Supply Systems should be followed in addition to this document.

4 In other words the discharge of water from a boiler to remove sediment and impurities.

5 This only applies to certain dry dock drainage which is not liable to contain tributyl tin (TBT) or triphenyl tin (TPT) compounds. Discharges from dry docks where coating materials containing TBT or TPT are applied or removed normally require a PPC authorisation (see PPC guidance).

6 Inorganic effluents and other effluents (including mines, quarries, landfill leachates and other effluents not defined elsewhere) which have either:
- a maximum daily volume greater than 10 m3 and up to and including 100 m3/d and an organic loading prior to treatment of no greater than 100 population equivalents, or

- a daily volume less than 10m3/d but have a population equivalent of greater than 15

7 Sewage and organic effluents which prior to treatment have an organic loading greater than 100 population equivalents.

8 Inorganic effluents and other effluents (including mines , quarries, landfill leachates and other effluents not defined elsewhere) which have a maximum daily volume greater than 100 m3/d or a maximum daily volume of greater than 10 m3/d which has prior to treatment an organic loading of greater than 100 population equivalents.

Swimming pool backwash and drain down water should be authorised by registration unless the volume is > 10 m^3/day, in which case the relevant licence should be obtained. EPI check the available dilution, provide best practice advice and register on condition that the discharge is dechlorinated. Refer to *WAT-SG-41: Discharge of Chlorinated Effluents* for further guidance on swimming pool discharges, chlorinated cooling water and chlorinated potable water discharges.

Trade effluent discharges which would normally be authorised by a registration can be escalated to a licence under certain specific circumstances, such as if the discharge poses a higher risk to the environment (see *section 4.1.2*).

NOTE: Existing unauthorised trade effluent discharges should be authorised in the same manner as a new discharge.

3.2 Connection to the Public Sewer and Adoption by Scottish Water

SEPA's strong preference for discharges from trade sites is connection to public sewer and SEPA are minded to refuse an application for authorisation to discharge sewage to surface waters or groundwaters where the site or proposed discharge point is within, or immediately adjacent to, the Scottish Water sewered area. SEPA seeks to refuse these applications on the basis of this type of treatment being a less efficient and less sustainable use of the water environment. However, a proposal for a private discharge from a single trade site which has the technical expertise to manage waste water treatment will be considered.

3.3 Discharge to Land

Discharges of trade effluent to land rather than surface water may be the preferred option in certain circumstances. Guidance on discharges of trade effluent to land is given in *WAT-RM-06: Regulation of Trade Effluent Discharges to Groundwater*. In such circumstances, the best environmental option which ensures protection of the water environment, groundwater and surface water, should be considered. This may involve a discharge to surface water, in which case this guidance should be followed.

3.4 Population Equivalent

For trade discharges containing a significant organic component, a population equivalent should be determined.

For the sewage-related element of a trade discharge, the latest version of *Flows and Loads* (British Water Code of Practice) may be of assistance in determining flow and load figures.

Population equivalent for trade effluents should be determined using the definition in *The Urban Waste Water Treatment (Scotland) Regulations 1994*. This equates to 60g/day of BOD. The organic biodegradable load is based on the maximum average weekly load entering the treatment plant during the year, excluding unusual situations such as those due to heavy rain.

4. Registration Applications

NOTE: Steps in Figure 1 flowchart should have been followed prior to this stage.

4.1 Registering Trade Effluent Discharges

4.1.1 General

Registered trade effluent discharges to the water environment are assumed to be relatively low risk. Registrations do not have to specify a responsible person and will not be routinely monitored.

However SEPA needs to ensure that the treatment proposed for the discharge provides an adequate level of environmental protection for the water environment. For trade effluent registrations, the SEPA officer must contact the applicant in order to ascertain whether Priority Substances, specific pollutants or listed substances may be present in the discharge.

Refer to *WAT-SG-05: Point Source Discharge Constituents* for guidance on determining the likely discharge constituents for a particular process type and consequently whether further information to that submitted on the registration form is required.

A proliferation of discharges to the water environment may result in an unacceptable impact on water quality. SEPA can assess the cumulative impacts of discharges using a database of authorised discharges. Therefore information relating to the proposed discharge must be kept by SEPA. In addition certain specific items, such as NGR, population equivalent and type of treatment, must be entered into CLAS to enable electronic interrogation of the database. The registration form and details of the current application fee are available from the *SEPA website*.

4.1.2 Escalation to a Licence

There are certain exceptional higher risk circumstances in which a discharge of trade effluent which would otherwise be authorised by registration will require the issuing of a licence.

In these cases the application will be treated as a licence and the guidance contained in *section 5.1* (Licensing Trade Effluent Discharges) should be followed. However the registration application charge will still apply in these cases.

Escalation to a licence is likely to occur only in exceptional circumstances where SEPA has to exercise greater control over the discharge and where site specific conditions are essential. It should be emphasised that if possible, escalation to a licence should be avoided by, for instance, requiring enhanced treatment as a condition of the registration. Escalation should be made only if additional safeguards, such as limits on toxic chemicals and specific maintenance requirements, are necessary which can only be

achieved by licensing. In addition, licensing allows monitoring to be undertaken (and the relevant subsistence charge applied).

If it is proposed to escalate a registration, then the decision must be agreed by the RRT.

Examples of where escalation to a licence (with specific conditions) may be required are where SEPA considers that –

- The discharge contains Priority Substances, specific pollutants or listed substances
- The discharge is in a situation of very limited dilution

If the untreated trade effluent is liable to contain Priority Substances, specific pollutants or listed substances, then the proposed discharge should be escalated to a licence. Refer to the following documents for guidance:

- *Policy 61: Control of priority and dangerous substances and specific pollutants in the water environment*
- *WAT-SG-79: Priority Hazardous Substances Licence Reviews - Guidance*
- *WAT-SG-05: Point Source Discharge Constituents*

Certain discharges escalated to a licence may also discharge into or may affect a SSSI, SPA or SAC. For these escalated discharges, consultation with SNH must be made.

For any discharges escalated to a licence and where there is a significant risk to a drinking water abstraction, Scottish Water, the Local Authority or the relevant water user must be consulted as appropriate (see *section 4.1.4*). Escalation will then allow the required 28 day consultation within the statutory timescale for determination of the licence. Refer to *WAT-RM-20: Advertising and Consultation* for further details.

4.1.3 Check Areas on GIS

The following areas identified on GIS should be checked:

- If the discharge is to classified waters, check whether the water quality status is good or above. If the water is not of good status and this is due to pollution pressures, then the registration application for an additional discharge may be refused (see *WAT-RM-22: Managing Refusals and Appeals*). However, the discharge may be registered if the additional load is negligible or if the downgrading is due to non-sewage factors such as iron. Frequently the discharge may be to unclassified waters (this may be the case for small watercourses with a catchment of <10km^2).
- Depending on the officer's local knowledge, it may be necessary to check GIS for other discharges in order to assess pollution pressures on

the water environment. As required, other officers in the local team should be consulted to gain local information.

- Public Sewer Network - where the site or proposed discharge point is within, or immediately adjacent to a sewered area SEPA will be minded to refuse the application, see section 3.2.

Since any new discharges will only be registered if they do not result in the deterioration of water quality, this will automatically protect sites designated for nature conservation such as SSSIs, SACs and SPAs.

4.1.4 Protected Areas

Protected Areas are given particular protection under the Water Framework Directive. They include areas designated under a number of other EU Directives as well as areas identified to protect the surface water or groundwater within them (Drinking Water Protected Areas).

SEPA is under a duty to ensure that the objectives of each Protected Area are achieved.

The small scale and low risk of trade effluent registrations means that their impact on Nutrient Sensitive Areas designated under UWWTD and NVZs does not need assessing on a case by case basis.

The risk of small trade effluent discharges impacting on a downstream potable water abstraction is considered to be low, but consideration of nearby downstream abstractions may be required.

The location of the discharge relative to designated Shellfish Growing Waters and designated Bathing Waters on the GIS database should be checked. Site specific factors such as the constituents of the discharge and its volume, location and available dilution should be taken into account in order to determine the risk to such waters. If the discharge is into or may affect such waters, then refer to *WAT-RM-13: Regulation of Microbiological Discharges* for guidance.
NOTE: Direct discharges to Shellfish Growing Waters and Bathing Waters are to be avoided.

4.2 Determining the Registration Application

It is important to realise that it is the impact on the water environment at a local scale which must be assessed rather than assessing the impact on the scale of the overall water body (the scale of which may be many kilometres).

4.2.1 Discharges to Watercourses

Trade effluent registrations are considered relatively low risk and time consuming modelling of the impact of the discharge is to be avoided if possible. To facilitate processing of applications several simple rules on

required dilution for particular levels of treatment have been developed as described below.

NOTE: These rules do not apply where the discharge is into stretches of watercourses where there are known serious pollution pressures. Such discharges will require more detailed consideration and alternative treatment conditions may be required. Discharges into areas of less than good class may be refused.

NOTE: Before a registration is refused, consideration should be made as to whether escalation to a licence would be acceptable and provide the necessary safeguards.

For discharges to watercourses, a measured Q95 flow should be used if one is available. Where no measured low flow is available, a Q95 can be obtained by requesting a Q95 low flow estimate from SEPA Hydrology. SEPA Hydrology will use the Low Flows 2000 Enterprise software package. It should be noted, however, that the estimated Q95 flow using Low Flows 2000 Enterprise becomes significantly inaccurate for catchments of <5 square kilometres or where there may be significant abstractions / discharges to the watercourse. If additional flow data is available this can be used to decrease some potential inaccuracies. Where greater accuracy is required SEPA Hydrology should be consulted as to how this might be achieved.

Augmenting River Flow to Provide Increased Dilution

Note: Where there is limited dilution SEPA will consider applications for new or modified abstractions or impoundment activities for the purpose of providing extra dilution for a point source discharge to allow further development. This would have the effect of augmenting the natural Q95 and Mean Daily Flow (MDF). For example, the compensation flow from an impounded reservoir could be increased to provide further dilution for a downstream discharge.

- SEPA will apply the relevant environmental assessments and standards to such applications as it would for any other and, where appropriate, specify or vary the abstraction or impoundment licence conditions accordingly.
- This approach could be taken for water resource activities and point source discharges which are part of the same site or process (and therefore operated by the same responsible person), e.g. a freshwater fish farm or distillery.
- This approach may also be considered for separate sites situated any distance apart and operated by different parties. However in this case it will be necessary to set conditions to reflect the fact that the operation of one activity is dependant on the operation of another (e.g. alternative discharge limits for high and low flows). Alternatively, a management agreement between the parties may be required. Any such arrangement

should be entered into with caution due to the complications which could arise if one of the activities were to cease. Further advice on how to progress such a situation may be required in which case officers should contact the WFD helpdesk and/or seek legal advice.

For organic trade effluents

NOTE: Organic discharges are those which primarily contain matter from an animal or vegetable origin and exert a notable biochemical oxygen demand. Such discharges include effluents from the food and drinks industry, vegetable washings, kennel washings and may include a sewage component from factories for example.

It is important to ensure that the discharge is not liable to contain Priority Substances, specific pollutants or listed substances. If such substances may be present, then escalation to a licence is required (*section 4.1.2*).

Organic Trade Effluents where >400:1 Dilution

If >400:1 dilution then primary treatment would be appropriate. However installation of a partial soakaway (see *WAT-RM-03: Regulation of Sewage Discharges to Surface Waters section 6.2.4*) with high level overflow would normally be required in addition, especially where there are other sources of pollution.

Organic Trade Effluents where <400:1 Dilution

If <400:1 dilution then secondary treatment is required as a minimum.

Significant pollution pressures

For locations where there are significant existing or anticipated pollution pressures on the watercourse.

- If dilution >100:1 and <400:1
  Secondary treatment designed to produce effluent with a mean BOD concentration of no more than 20mg/l must normally be provided
- If dilution >30:1 and <100:1
  Secondary treatment designed to produce effluent with a mean ammonia concentration of no more than 5mg/l must normally be provided.
- If dilution <30:1
  Enhanced treatment should be provided, the exact nature of which will vary on a case by case basis. Factors which should be taken into account will include dilution available, existing pollution pressures and likelihood of further discharges on the watercourse, proximity of Protected Areas.
  - An example of enhanced treatment is nitrifying secondary treatment plus an appropriately sized reed bed and/or partial soakaway (see *WAT-RM-03: Regulation of Sewage Discharges to Surface Waters*, *section 6.2.4*) with high level overflow

No significant pollution pressures

For locations where there are no significant existing or anticipated pollution pressures on the watercourse.

- If dilution >30:1 and <400:1
  Secondary treatment designed to produce effluent with a mean BOD concentration of no more than 20mg/l must normally be provided
- If dilution >10:1 and <30:1
  Secondary treatment designed to produce effluent with a mean ammonia concentration of no more than 5mg/l
- If dilution <10:1
  Enhanced treatment should be provided, the exact nature of which will vary on a case by case basis. Factors which should be taken into account will include dilution available, existing pollution pressures and likelihood of further discharges on the watercourse, proximity of Protected Areas.
  - An example of enhanced treatment is nitrifying secondary treatment plus an appropriately sized reed bed and/or partial soakaway (see *WAT-RM-03: Regulation of Sewage Discharges to Surface Waters, 6.2.4)* with high level overflow

NOTE: The above dilutions are guidelines only and officers should use their professional judgement when determining whether a type of treatment is acceptable at a particular location.

Escalation to a licence may be required in exceptional circumstances (see *section 4.1.2*) in order to exercise greater site specific control via the use of licence conditions.

Table 2 Registration look up table for organic trade effluent discharges to watercourses

Dilution range:		**Treatment / standards required**
Anticipated/Existing Pollution Pressure	**No Anticipated/Existing Pollution Pressure**	
>400:1	>400:1	Primary / Septic tank (with partial soakaway)
100:1 - 400:1	30:1 - 400:1	Secondary treatment designed to produce effluent with a mean BOD concentration ≤20mg/l
30:1 - 100:1	10:1 - 30:1	Secondary treatment designed to produce effluent with a mean ammonia concentration ≤5mg/l
<30:1	<10:1	Enhanced treatment or refuse

For Inorganic and Other Trade Effluents

The dilution thresholds described above cannot be used for inorganic trade effluents. The acceptable level of treatment is much more site-specific and dependent on the process from which the effluent arises.

4.2.2 Discharges to Coastal and Transitional Waters

Discharges to tidal waters should be assessed in accordance with *section 6.4.2* and the guidance in *WAT-RM-13: Regulation of Microbiological Discharges*. Primary treatment (with optional partial soakaway) is normally acceptable for direct discharges of registered organic trade effluent discharges to tidal waters due the large dilution available. However there may be site specific circumstances such as where there are cumulative impacts or issues relating to the Protected Area status which require enhanced treatment.

4.2.3 Discharges to Freshwater Lochs

Discharges to freshwater lochs should be assessed in accordance with *section 6.4.3*.

4.3 Registering the Discharge

In order to register the discharge SEPA must be sure that

- Local environmental standards will not be breached
  Refer to *WAT-SG-53: Environmental Standards for Discharges to Surface Waters* for details (Compliance with local environmental standards will automatically ensure that there will be no deterioration in status).
  NOTE: For discharges to watercourses, following the guidelines given in *section 4.2.1* should ensure that the above criterion is met.

  Receiving environment is of good status or above for a discharge to classified waters
  However where the water is at less than good status (and this is due to pollution pressures) the discharge may still be registered if the additional load is negligible or if the downgrading is due to non-sewage factors such as iron.
  NOTE: The discharge does not compromise the RBMP objectives).

- Connection to the public sewer should be promoted where it is reasonably practicable to do so (*WAT-RM-21: Allocation of Capacity and Protection of the Water Environment*). SEPA will normally refuse an application where the site or proposed discharge is within, or immediately adjacent to a sewered area. See section 3.2.

Guidance on determining appropriate treatment can be found in *section 6*.

Developments involving registration of a trade effluent discharge may also involve another authorisable water use activity such as a water abstraction, bank reinforcement or a road crossing of a watercourse. If this is the case, the relevant authorisation must be obtained. Refer to *WAT-RM-02: Regulation of Licence-level Engineering Activities* for further guidance.

NOTE: Construction of the small outfall itself would not normally require authorisation.

Once submitted, SEPA has 30 days in which to determine a registration. During this period informal discussions may take place regarding the proposed discharge and agreement may be reached to amend the registration details. In particular, this may be done when the submitted registration details are unclear or not appropriate to protect the water environment. For example the submitted registration form may propose primary treatment, whereas SEPA may consider that secondary treatment is required in that particular situation. In such cases, discussions on the level of treatment must be undertaken with the applicant. Once agreement on

treatment has been reached, then the submitted registration details can be amended if necessary and a letter confirming the registration details sent out to the applicant.

Where the SEPA officer requests further information [Regulation 14(1)] and considers that the discussions will extend beyond the 30 day statutory determination period [Regulation 16(1)(a)] then the officer should request the information in writing as part of a request for further information (Refer to *WAT-LETT-14: Letter Requesting Further Information*). This effectively stops the determination and will only begin again once the required information has been supplied [Regulation 16(2)(b)].

Register activity

SEPA then forwards to the applicant *WAT-LETT-53: Discharge Notification (Trade / Other)*, which contains the registration details that the discharger is legally required to comply with. This comprises address of site, NGR, population equivalent and type of treatment. The registration also requires that the treatment system will not cause pollution and requires the treatment system (septic tank, biodisc, reedbed) to be maintained.

4.4 Upgrading in Treatment for Existing Registered Discharges

There may be occasions when a registered discharge is causing a significant environmental impact, requiring remedial action. Upgrading in treatment can be addressed by various means such as -

- A SEPA-initiated variation of the registration details to require improved treatment.
  This can be appealed against.
- Serving a Notice under Regulation 32 requiring specific work to be undertaken.
- A licence can be imposed under Regulation 10.

4.5 Variation of Registered Discharge Details

SEPA may vary, or the discharger may apply to vary, a discharge registration. If the details associated with a registration (such as the p.e.) change, then the change of details must be submitted in writing with the appropriate fee. Refer to *WAT-RM-09: Modifications to CAR Authorisations* for further details.

5. Licence Applications

NOTE: The flowchart in *Figure 1* should have been followed prior to this stage in order to determine whether it is feasible to connect to a public sewer or to discharge to land.

5.1 Licensing Trade Effluent Discharges

5.1.1 General

Due to their size, licensable trade effluent discharges are of intrinsically higher risk than registered trade effluent discharges.

Trade effluents from certain industrial sectors with an organic loading prior to treatment of greater than 4000 p.e. require to be compliant with the *Urban Waste Water Treatment Directive 91/271/EEC* (CELEX: 31991L0271) (UWWTD) The industrial sectors are provided in Schedule 5 to *The Urban Waste Water Treatment (Scotland) Regulations 1994*. Conditions should be applied which are 'appropriate to the nature of the industry' in accordance with Regulation 8 of the regulations (rather than the BOD/COD limits in Schedule 3 which apply to discharges containing sewage).

Such discharges must be identified on CLAS as qualifying for UWWTD. Refer to Urban Waste Water Treatment Regulations Guidance Note (available on *UWWTD* intranet page) for further details.

The licence application form and details of the current application fee are available from the *SEPA website*.

Refer to *WAT-SG-05: Point Source Discharge Constituents* for guidance on determining the likely discharge constituents for a particular process type and consequently whether further information to that submitted on the licence application form is required.

5.1.2 Licence Fees

Details as to which discharges require to pay the simple and which the complex licence application fee are given in the publication *Controlled Activities Regulations: A Practical Guide*.

A responsible person must be named on the licence. The responsible person is the person specified in a licence who shall secure compliance with the terms of the licence. The responsible person can be a named individual or the body corporate.

5.1.3 Advertising

Refer to *WAT-RM-20: Advertising and Consultation* for more details.

5.1.4 Consultation

Refer to *WAT-RM-20: Advertising and Consultation* for more details.

5.1.5 Other Water Use Regimes

An assessment should be made as to whether an application is required under other water use regimes. For example the development may involve a road crossing of a watercourse, bank reinforcement or a drinking water abstraction, any of which may require incorporating in a single water user licence. The construction of the outfall itself may require authorising.

Refer to *WAT-RM-02: Regulation of Licence-level Engineering Activities* for further guidance on best practice for outfall construction and on the circumstances in which authorisation may be required.

5.2 Assessment Of Receiving Waters

5.2.1 Check Areas on GIS

The following areas identified on GIS should be checked:

- If the discharge is to classified waters, check whether the water quality status is good or above. If the water is not of good status due to pollution pressures and the discharge would result in further deterioration, then the licence application for an additional discharge should normally be refused. Refer to *WAT-RM-21: Allocation of Capacity and Protection of the Water Environment* and *WAT-RM-22: Managing Refusals and Appeals* for details.
  (However, frequently the discharge may be to an unclassified waters (this may be the case for small watercourses with a catchment of <10km2))
- Depending on the officer's local knowledge, it may be necessary to check GIS for other discharges in order to assess pollution pressures on the water environment. As required, other officers in the local team should be consulted to gain local information.
- Sites listed for nature conservation
  A national agreement between SEPA and SNH has identified environmental standards and criteria required to protect designated sites. SEPA will undertake the SEPA Conservation test using the standardised SEPA *Nature Conservation Procedure*.
- SEPA identified 'recreational and shoreline waters'
  Refer to *WAT-RM-13: Regulation of Microbiological Discharges* for guidance.
- Public Sewer Network - where the site or proposed discharge point is within, or immediately adjacent to a sewered area SEPA will be minded to refuse the application, see section 3.2.

5.2.2 Protected Areas

Protected Areas are given particular protection under the Water Framework Directive. They include areas designated under a number of other EU Directives as well as areas identified to protect the surface water or groundwater within them (Drinking Water Protected Areas).

- The risk of the trade effluent discharge impacting on a nearby downstream potable water abstraction requires consideration. A check of GIS must be made to see if there are any abstractions close enough downstream which may be potentially affected by the discharge.
- The location of the discharge relative to designated Shellfish Harvesting Waters and designated Bathing Waters on the GIS database should be checked. Site specific factors such as the constituents of the discharge and its volume, location and available dilution should be taken into account in order to determine the risk to such waters. Refer to *WAT-RM-13: Regulation of Microbiological Discharges* for guidance.
- Nutrient sensitive areas designated under UWWTD and the Nitrates Directive
- Areas designated for the protection of habitats and species
  A national agreement between SEPA and SNH has identified environmental standards and criteria required to protect designated sites. SEPA will undertake the SEPA Conservation test using the standardised SEPA *Nature Conservation Procedure*.

5.3 Determining the Licence Application

It is important to realise that it is the impact on the water environment at a local scale which must be assessed rather than assessing the impact on the scale of the overall water body (the scale of which may be many kilometres).

5.3.1 For Discharges to Watercourses

For discharges to watercourses, a measured Q95 flow should be used if one is available. Where no measured low flow is available, a Q95 can be obtained by requesting a Q95 low flow estimate from SEPA Hydrology. SEPA Hydrology will use the Low Flows 2000 Enterprise software package. It should be noted, however, that the estimated Q95 flow using Low Flows 2000 Enterprise becomes significantly inaccurate for catchments of <5 square kilometres or where there may be significant abstractions / discharges to the watercourse. If additional flow data is available this can be used to decrease some potential inaccuracies. Where greater accuracy is required SEPA Hydrology should be consulted as to how this might be achieved.

Augmenting River Flow to Provide Increased Dilution

Note: Where there is limited dilution SEPA will consider applications for new or modified abstractions or impoundment activities for the purpose of providing extra dilution for a point source discharge to allow further development. This would have the effect of augmenting the natural Q95 and Mean Daily Flow (MDF). For example, the compensation flow from an impounded reservoir could be increased to provide further dilution for a downstream discharge.

- SEPA will apply the relevant environmental assessments and standards to such applications as it would for any other and, where appropriate, specify or vary the abstraction or impoundment licence conditions accordingly.
- This approach could be taken for water resource activities and point source discharges which are part of the same site or process (and therefore operated by the same responsible person), e.g. a freshwater fish farm or distillery.
- This approach may also be considered for separate sites situated any distance apart and operated by different parties. However in this case it will be necessary to set conditions to reflect the fact that the operation of one activity is dependant on the operation of another (e.g. alternative discharge limits for high and low flows). Alternatively, a management agreement between the parties may be required. Any such arrangement should be entered into with caution due to the complications which could arise if one of the activities were to cease. Further advice on how to progress such a situation may be required in which case officers should contact the WFD helpdesk and/or seek legal advice.

For unsampled organic trade effluents

The discharge should be assessed in order to determine whether inspection or sampling is required. Refer to *DRM-G-006: DREAM Interim Guidance on rules for compliance monitoring*.

If the discharge contains significant concentrations of Dangerous Substances, Priority Substances or Specific Pollutants, then the dilution thresholds in this section are inappropriate and more detailed assessment is required.

The guidelines in this section should only be used for unsampled organic trade discharges. Sampled discharges should be assessed on a more detailed basis and the impact of the discharge should normally be modelled.

NOTE: These rules do not apply where the discharge is into stretches of watercourses where there are known serious pollution pressures. Such

discharges will require more detailed consideration and alternative treatment conditions may be required.

For classified watercourses, discharges into areas of less than good class may be refused.

>400:1 dilution

If >400:1 dilution then primary treatment would normally be acceptable. However a partial soakaway (see *WAT-RM-03: Regulation of Sewage Discharges to Surface Waters*, *section 6.2.4*) would normally be required.

<400:1 dilution

If <400:1 dilution then secondary treatment would normally be required.

Significant pollution pressures

For locations where there are significant existing or anticipated pollution pressures on the watercourse.

- If dilution >200:1 and <400:1
  Secondary treatment designed to produce effluent with a mean BOD concentration of no more than 20mg/l, as described in section 7.2
- If dilution <200:1
  Then the discharge is of higher risk and modelling should normally be undertaken as described below.

No significant pollution pressures

For locations where there are no significant existing or anticipated pollution pressures on the watercourse.

- If dilution >100:1 and <400:1
  Secondary treatment designed to produce effluent with a mean BOD concentration of no more than 20mg/l
- If dilution <100:1
  Then the discharge is of higher risk and modelling should normally be undertaken

A Monte Carlo combined distribution calculation should be undertaken as described in *WAT-SG-02: Modelling Continuous Discharges to Rivers*. Either the version of the Monte Carlo software available on certain PCs should be used or the software on the EAU Intranet site accessed. Refer to *WAT-RM-21: Allocation of Capacity and Protection of the Water Environment* for additional guidance.

Enhanced treatment producing higher quality effluent may be required. Use of partial soakaway is especially important if the dilution is particularly low. The exact nature of the enhanced treatment depends on the particular circumstances of the discharge, such as the dilution, size of discharge,

existing pressures on watercourse, other potential developments and proximity of Protected Areas.

Table 3 Licence look up table for unsampled organic trade effluent discharges to watercourses

Dilution range:		Treatment / standards required
Anticipated/Existing Pollution Pressure	**No Anticipated/Existing Pollution Pressure**	
>400:1	>400:1	Primary / Septic tank (with partial soakaway)
200:1 - 400:1	100:1 - 400:1	Secondary treatment designed to produce effluent with a mean BOD concentration ≤20mg/l
<200:1	<100:1	Site-specific standards (MC model)

NOTE: The above dilutions are guidelines only and officers should use their professional judgement when determining whether a type of treatment is acceptable at a particular location.

5.3.2 For Inorganic and Other Trade Effluents

The dilution thresholds described above cannot be used for inorganic trade effluents. The acceptable level of treatment is much more site specific and dependent on the process from which the effluent arises.

5.3.3 Discharges To Coastal and Transitional Waters

These should be assessed in accordance with the details in section 6.4.2 and the relevant guidance in *WAT-RM-13: Regulation of Microbiological Discharges*.

5.3.4 Discharges To Freshwater Lochs

These should be assessed in accordance with the details in section 6.4.3.

5.4 Licensing the Discharge

Licence conditions must be set so that -

- Local environmental standards will not be breached
  Refer to *WAT-RM-21: Allocation of Capacity and Protection of the Water Environment* and *WAT-SG-53: Environmental Standards for Discharges to Surface Waters* for guidance. Compliance with local environmental standards will automatically ensure that there will be no deterioration in status.

  NOTES:

  - For discharges to watercourses, following the guidelines given in *section 5.3.1* should ensure that the above criterion is met.
  - Deterioration from high to good status can only be permitted in certain circumstances. Refer to *WAT-RM-22: Managing Refusals and Appeals* for details.

- Connection to the public sewer should be promoted where it is reasonably practicable to do so (*WAT-RM-21: Allocation of Capacity and Protection of the Water Environment*). SEPA will normally refuse an application where the site or proposed discharge is within, or immediately adjacent to a sewered area. See section 3.2.

Guidance on determining appropriate treatment can be found in *section 6*.

Developments involving licensing of a trade effluent discharge may also involve another authorisable water use activity such as a water abstraction, bank reinforcement or a road crossing of a watercourse. If this is the case, the relevant authorisation must be obtained (refer to *WAT-RM-02: Regulation of Licence-level Engineering Activities* for guidance) and a single water user licence covering the discharge and the engineering or abstraction activity may be issued.

NOTE: Construction of the outfall itself would not normally require authorisation as long as it complies with the guidance on best practice. Refer to *WAT-RM-02: Regulation of Licence-level Engineering Activities* for details.

Once submitted, SEPA has 4 months in which to determine a licence. During this period informal discussions may take place regarding the proposed discharge. Once the licence conditions have been drafted, then SEPA will forward a copy to the applicant for their comments prior to issuing the licence.

Where the SEPA officer requests further information [Regulation 14(1)] and considers that the discussions will extend beyond the 30 day statutory determination period [Regulation 16(1)(a)] then the officer should request the information in writing as part of a request for further information (Refer to *WAT-LETT-14: Letter Requesting Further Information*). This effectively stops the determination and will only begin again once the required information has been supplied [Regulation 16(2)(b)].

In order to assist other SEPA officers who may in the future deal with queries relating to the licence conditions, details of how any non-standard licence conditions were determined must be recorded either on the Document

Approval Form (DAF) in the box titled 'Details of non-standard conditions not already covered in an appropriate decision document or RRT paper' and placed on the working file. This is particularly important for numeric licence conditions and information used in the determination such as flows and p.e. should be recorded. This record will prove useful in situations such as when reviewing the licence conditions, if there was an appeal against a Notice or if there were complaints from the operator or public regarding the licence conditions.

The discharge should be assessed in order to determine whether inspection or sampling is required. Refer to *DRM-G-006: DREAM Interim Guidance on rules for compliance monitoring*.

Upgrading in Treatment for Existing Licensed Discharges

There may be occasions when a licensed discharge is causing a significant environmental impact, requiring remedial action. Upgrading in treatment can be addressed by various means such as -

- A SEPA-initiated variation of the licence conditions to require improved treatment.
  This can be appealed against.
- A Notice can be served under Regulation 32 requiring specific work to be undertaken.

5.5 Variation of Licence Conditions

SEPA may vary or the operator may apply to vary a licence. Variations may be administrative variations (i.e. with no environmental implications) or technical variations. Refer to *WAT-RM-09: Modifications to CAR Authorisations* for guidance.

6. Determining Appropriate Treatment

6.1 Environmental Drivers

SEPA will be expected to provide discharge criteria in order to ensure that the appropriate level of treatment is provided to ensure delivery of environmental protection. The following issues should be considered when discussing treatment provision with dischargers.

The key environmental drivers must be identified as they will influence the level of treatment required. The drivers vary according to the receiving waters:

- Discharges to DWPAs – reduction in bacterial load if there is a nearby drinking water supply.
- Rivers and lochs – reduction in BOD & ammonia load (compliance with Environmental Standards)
- Rivers and lochs – reduction in phosphorus load in areas sensitive to eutrophication (compliance with Environmental Standards)
- Lochs – reduction in microbiological load to SEPA identified recreational water and to designated Bathing Waters (compliance with Environmental Standards and minimise aesthetic impact and health risk);
- Tidal waters – reduction in microbiological loads (compliance with Bathing Waters and Shellfish Waters standards). Refer to *WAT-RM-13: Regulation of Microbiological Discharges* for guidance.

For example, where the priority driver is the reduction of bacterial load, waste stabilisation ponds and wetlands may provide the most effective form of treatment by providing high retention periods and natural ultraviolet disinfection.

Practical constraints mean that SEPA will not normally require phosphorus removal or microbiological disinfection for discharges of less than 100 p.e., but the treatment process best suited to the environmental driver should be stipulated as a licence condition.

6.2 Treatment Options

Treatment of trade effluents is specific to the type of trade process and the subsequent composition of the effluent.

However under UWWTD, SEPA has a duty to ensure that discharges of industrial wastewater with a BOD loading of > 4000 p.e. from specified industrial sectors receive appropriate treatment such that receiving water quality objectives will not be compromised. Further details can be found in the Urban Waste Water Treatment Regulations Guidance Note (available on *UWWTD* intranet page).

6.3 Typical Effluent Composition and Other Considerations

Refer to *WAT-SG-05: Point Source Discharge Constituents* for information on typical constituents of certain process effluents.

Information on typical landfill leachate quality can be found in the following documents:

- Waste Management Paper No. 26A (Landfill Completion)
- Waste Management Paper No. 26B (Landfill Design, Construction and Operational Practice)

For complex effluents or discharges with constituents without an EQS, refer to guidance document *WAT-SG-57: Toxicity Screening for Discharges*.

In cases where such substances are included in the effluent, refer to *Policy 61: Control of priority and dangerous substances and specific pollutants in the water environment* and *WAT-SG-79: Priority Hazardous Substances Licence Reviews - Guidance* for additional guidance.

6.4 Assessing Impact of the Discharge

The following sector-specific guidance should be referred to where appropriate:

- *WAT-RM-12: Regulation of Discharges from Water Treatment Works*

For all receiving water environments the initial determination steps are:

1. Composition
   The composition of the discharge should be determined using the information on the application form (and from discussion with the applicant if necessary) along with the guidance in *WAT-SG-05: Point Source Discharge Constituents*.
2. Quality
   Relevant environmental quality standards should be determined. These EQSs vary depending on the typology of the receiving water environment. They may also vary depending on the designation of the receiving environment e.g. UWWTD designated sensitive watercourse, Bathing / Shellfish Waters microbiological standards.
3. Impact
   The impact of the discharge on the environment should be determined using the relevant section below.

6.4.1 Discharge to Watercourse

For organic trade effluents, assessment of the impact can be made by simply using the dilution available or by modelling, details of which are described in sections *4.2.1* (for registrations) and *5.3.1* (for licences).

Monte Carlo modelling should always be undertaken rather than simple mass balance modelling. The output from Monte Carlo modelling is a 95%ile figure which should be multiplied by a factor in order to obtain the upper tier standard. NOTE: The upper tier standard should also be used as the single tier standard where an instantaneous maximum is required.

6.4.2 Discharge to Coastal and Transitional Waters

Particular consideration needs to be made as to the impact on designated Bathing Waters, Shellfish Waters, Shellfish Harvesting Waters and SEPA identified 'recreational and shoreline waters'. Refer to *WAT-RM-13: Regulation of Microbiological Discharges* and *WAT-SG-11: Modelling Coastal and Transitional Discharges* for further guidance if required.

The outfall should normally have the top of the pipe (soffit) located below Mean Low Water Spring (MLWS) to aid dispersion etc. But there may be situations where MLWS may lie a large distance across mudflats e.g. as is frequently the case in estuaries. In this case it may not be reasonable to require the construction of an outfall below MLWS, especially if for a small discharge. Similar cost/benefit considerations should apply for outfalls constructed in other difficult situations such as across a very rocky shore.

The outfall should have protection against erosion of the underlying sand so as to prevent movement of the outfall pipe and premature leakage of effluent at a point above MLWS.

NOTE: Engineering works below Mean High Water Spring (MHWS) such as the construction of the outfall itself may require a licence from *Marine Scotland*.

6.4.3 Discharge to Freshwater Loch

There is a strong presumption against a discharge to a freshwater loch and should only be agreed if all other options have been demonstrated to be impractical. Refer to *WAT-RM-37: Regulation of Phosphorus Discharges to Freshwater Lochs*. However if a continuous discharge of organic trade effluent to a freshwater loch is the only viable option, the presumption is for secondary treatment with a partial soakaway. Furthermore, in certain circumstances (e.g. Protected Areas status, areas subject to a catchment plan) SEPA may require more stringent treatment for reduction of phosphorous.

In order to determine whether the proposed discharge may exceed an environmental quality standard in the receiving loch, modelling may be required. Details of this can be found in *WAT-RM-37: Regulation of Phosphorus Discharges to Freshwater Lochs*.

7. Licence Conditions For Effluent Discharges

The trade effluent template (*WAT-TEMP-22: Trade Effluent Licence Template*) should be followed except in the following types of trade discharges in which case the specific licence templates should be used along with the relevant guidance.

- *WAT-TEMP-22: Trade Effluent Licence Template*

For UWWTD qualifying discharges, 'appropriate conditions' should be set.

Refer to *Policy 61: Control of priority and dangerous substances and specific pollutants in the water environment* and *WAT-SG-79: Priority Hazardous Substances Licence Reviews - Guidance* for guidance on how to determine whether the discharge is liable to contain such substances and when to apply numeric or descriptive conditions.

7.1 Effluent Quality Conditions

In certain circumstances where flows are particularly variable, such as in a batch process, licence conditions based on effluent load rather than concentrations may be more appropriate.

7.1.1 Descriptive Conditions

Descriptive conditions describe the quality or impact of the effluent and are used in place of numeric limits when the risk of environmental impact is low. Although licences with no numeric limits are generally excluded from routine monitoring plans, periodic inspections may be required to ensure there is no chronic environmental impact. If routine sampling is warranted then a descriptive licence is inappropriate and two tier numeric limits must be derived.

Descriptive conditions may be used for unsampled organic discharges from septic tanks.

A descriptive condition must not be included with a numeric standard regulating the same determinand. For example, the descriptive oil condition "shall not include significant traces of visible oil or grease" must not be included with a numeric standard for hydrocarbon oil.

Conditions to prevent growth of sewage fungus downstream, smothering of the stream bed, foaming and visible effluent plumes should be included if there are no sanitary determinands.

Descriptive conditions should also be included to support enforcement action in the event of effluent quality deteriorating due to poor maintenance, plant breakdown or hydraulic overload (see *section 7.2.1*).

7.1.2 Single Tier Standards

If descriptive conditions are not appropriate, numeric standards must be used and single tier standards should be used for discharges that will not be sampled. However certain types of sampled discharge with atypical flow and quality performance patterns may use single tier standards (as discussed in *section 7.1.3*).

Inadequate maintenance is one of the major causes of problems with small treatment plants. In order to facilitate enforcement in the event of poor maintenance, a single tier default standard should be applied to all organic trade effluent licences, including descriptive licences, as follows:

- 100 mg/l suspended solids
  For all treatment plants whether primary, secondary or tertiary
  (However there may be some treatment plants where a 100mg/l SS limit will be overly restrictive. In these cases, a limit which would be appropriate for enforcement purposes should be set)

7.1.3 Two-Tier Numeric Standards

Numeric two-tier effluent quality standards are used for discharges which require routine sampling to ensure that the discharge remains compliant and that downstream uses and water quality are not compromised. Limits are set as two-tier standards; a 95%ile lower tier and a 99, or higher, percentile as upper tier, to enable compliance assessment. Exceptions to this are restricted to a number of discharges with atypical flow and quality performance patterns such as intermittent quarry discharges. This abnormal flow and composition may be due to such discharges being either weather dependent or pumped. For these discharges, the effluent quality distribution cannot be described by simple lognormal distribution and single tier standards should be used.

For organic trade effluent discharges, there may be a limited number of circumstances where two-tier suspended solids standards may be appropriate. These may include slow deep rivers and some SACs where the designated species may be sensitive to suspended solids.

Septic tanks designed in accordance with BS6297:1983 and adequately maintained are capable of achieving 100/250 mg/l 2-tier standards for suspended solids. If tighter limits are required, secondary treatment will be necessary.

7.1.4 Priority, Dangerous Substances or Specific Pollutants

All discharges **liable to contain** Priority, Dangerous Substances or Specific Pollutants must have numeric or descriptive limits depending on the level of environmental risk. Refer to *Policy 61: Control of priority and dangerous substances and specific pollutants in the water environment* and *WAT-SG-79: Priority Hazardous Substances Licence Reviews - Guidance* for more guidance.

When adding or changing a Priority Hazardous Substance or a Dangerous Substance Directive list 1 substance to a site licence, NEMS and CLAS will need to be updated to reflect the reporting requirements of these Directives.

Both NEMS and CLAS will need to be updated to capture the correct information to allow the correct monitoring to be planned and carried out. NEMS and CLAS guidance relating to updating the systems are available (User Manual and Guide, NEMS User Manual Chemistry and CAR on CLAS), as well as Superusers and User Groups who can be contacted.

7.2 General Conditions

7.2.1 Maintenance

Conditions requiring operation and maintenance of the treatment facility in accordance with the manufacturer's instructions and provision of a record of maintenance for inspection by SEPA, on request, should be included in descriptive licences. Primary settlement tanks should be de-sludged at appropriate intervals to prevent excessive carry-over of suspended solids – a minimum frequency of once every two years is advised. Most package effluent treatment plants require a power source and licences should include a condition requiring the provision of a visual or audible alarm system to notify of plant breakdown or power failure.

7.2.2 Flow Monitoring

Flow monitoring is not normally required for discharges from small effluent treatment works. Where justified, conditions specifying the maximum daily flow and/or instantaneous flow rate and provision of appropriate flow monitoring/recording equipment can be included. Flow recording equipment can be costly and should only be required in exceptional circumstances. Readings from a water supply flow meter could be used in place of a flow meter on the discharge.

7.2.3 Sampling Points

A facility for inspecting and obtaining representative samples of the discharge is required. The sample point, at which point the effluent numeric conditions would apply, would normally be immediately after the treatment system. This ensures that the effluent produced by the septic tank or other treatment system is of the required quality. If the numeric conditions applied after a partial soakaway, the effects of a poorly maintained system would be masked by the partial soakaway itself and enforcement action could be compromised.

Details of a sampling chamber allowing easy access into the manhole to sample using a container can be found in the *Technical Handbook* (Section 3: Environment).

If the discharge is to be routinely monitored, the site will require a health and safety risk assessment. For new developments, where the sampling point has not yet been constructed, the requirement for safe access should be discussed with the discharger prior to the licence being granted.

References

Key References

- *Controlled Activities Regulations: A Practical Guide*, (www.sepa.org.uk)
- *Fish Farm Manual* (www.sepa.org.uk)
- *Flows and Loads* British Water Code of Practice (www.britishwater.co.uk/)
- *Marine Scotland* (www.scotland.gov.uk/)
- *Nature Conservation Procedure* SEPA Intranet
- *Policy 61: Control of priority and dangerous substances and specific pollutants in the water environment* (www.sepa.org.uk)
- *Technical Handbook*: Section 3: Environment (www.scotland.gov.uk/)
- *The Urban Waste Water Treatment (Scotland) Regulations 1994* SSI No. 2842 (www.legislation.gov.uk)
- *Urban Waste Water Treatment Directive 91/271/EEC* CELEX: 31991L0271 (http://eur-lex.europa.eu/homepage.html)
- *UWWTD* SEPA Intranet
  includes link to Urban Waste Water Treatment Regulations Guidance Note, Scottish Office 1998

Regulatory Methods

- *WAT-RM-01: Regulation of Abstractions and Impoundments*
- *WAT-RM-02: Regulation of Licence-level Engineering Activities*
- *WAT-RM-03: Regulation of Sewage Discharges to Surface Waters*
- *WAT-RM-06: Regulation of Trade Effluent Discharges to Groundwater*
- *WAT-RM-09: Modifications to CAR Authorisations*
- *WAT-RM-12: Regulation of Discharges from Water Treatment Works*
- *WAT-RM-13: Regulation of Microbiological Discharges*
- *WAT-RM-20: Advertising and Consultation*
- *WAT-RM-21: Allocation of Capacity and Protection of the Water Environment*
- *WAT-RM-22: Managing Refusals and Appeals*
- *WAT-RM-37: Regulation of Phosphorus Discharges to Freshwater Lochs*

Supporting Guidance

- *DRM-G-006: DREAM Interim Guidance on rules for compliance monitoring*
- *WAT-SG-02: Modelling Continuous Discharges to Rivers*
- *WAT-SG-05: Point Source Discharge Constituents*
- *WAT-SG-11: Modelling Coastal and Transitional Discharges*
- *WAT-SG-39: Point Source Regime Definitions and Scope*
- *WAT-SG-41: Discharge of Chlorinated Effluents*
- *WAT-SG-53: Environmental Standards for Discharges to Surface Waters*
- *WAT-SG-57: Toxicity Screening for Discharges*
- *WAT-SG-79: Priority Hazardous Substances Licence Reviews - Guidance*

Templates

- *WAT-LETT-14: Letter Requesting Further Information*
- *WAT-LETT-53: Discharge Notification (Trade / Other)*
- *WAT-TEMP-18: Water Treatment Works Licence Template*
- *WAT-TEMP-22: Trade Effluent Licence Template*

- End of Document -