

Standard Operating Procedures		SOP Ref:DC-1	DC-1-Discharge of Uncontaminated Surface Water to Foul Sewer	
Approved & Issued by:	Amelia Armstrong		Written by:	Stuart McNish
Operational Area:	BKP Environmental Romsey			
Title:	Discharge of Uncontaminated Surface Water to Foul Sewer			

1. ACTIVITY

This activity details the safe discharge of uncontaminated surface water from non-storage, non-process areas to foul sewer via trade effluent consent pipeline to public sewer at Timsbury playing fields. BKP will apply for a trade effluent consent with local sewage undertaker to allow this surface water to be discharged via fixed pipeline to Timsbury playing fields. The site previously had a trade effluent discharge consent for process effluents produced at the site. This trade effluent is only to be used for uncontaminated surface water and cannot be used for any trade effluents produced from processes onsite. Specific limits will be set by the sewage operator upon application but the operator will discharge effluents meeting the requirements of the BAT-AELs for indirect discharge to a receiving water body after testing onsite. Effluent samples will be taken and tested by the sewage operator monthly when the discharge consent is used which is expected to be in periods of very high rainfall to prevent surface water accumulating onsite or surface water needing to be tankered offsite to prevent an impact on day-to-day site operations. All equipment specified by the trade effluent receiving company will be installed and calibrated and maintained in accordance with their requirements and the fixed pipework remains in place from when the consent was stopped being used in 2022 and the consent surrendered. The directly associated activity was removed as part of a previous permit variation and will be reinstated but only for discharging surface water.

2. PERSONS AT RISK

- Operator
- Other yard operatives
- Driver
- General public
- Contractors and visitors
- Shared Site Occupancy

3. HAZARDS

- Inclement weather, ice, snow, rain or fog.
- Slips, trips, falls
- Any chemicals within reagent testing in the laboratory for testing materials (Hach cuvettes)

This SOP is subject to review as soon as reasonably practicable in the event of the occurrence of any incident, or series of incidents, related to this activity; at a date that the Senior Management Team considers appropriate OR in any event, NOT LATER THAN 2 YEARS from the date of issue.

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- Flooding or standing water potentially in extreme weather

4. OVERVIEW & SITE LAYOUT/INFRASTRUCTURE

The BKP site consists of three distinct main bunded areas. Individual bays for designated waste storage also have their own individual bunding and containment. This document will go through all the individual waste storage areas and bunding and subsequent treatment and disposal of any water within those areas where it may be created from rainfall.

There is small staff vehicle parking area between the three plots of the site. This consists of compacted hard standing aggregate and it is bordered by a number of mature trees that run along the fence line of bunny lane (the access road to the site). There are some site offices distinct from the processing area in the lower yard as well as some electric vehicle charging points and visitors parking adjacent to the main office.

The site is fenced off in distinct areas with 1.8m high palisade fencing and gates meaning the whole site is secure. There is a vehicle barrier (activated with a key fob) to control vehicle movements into the lower yard whilst the site is open and operational. This also restricts unwanted visitors such as members of the public trying to access the HWRC further down bunny lane.

The site has undergone significant investment since 2020 improving all waste storage areas in-line with current EA & CIRIA guidance including. This was included within a substantial permit variation for the site that was issued in 2023.

- Bespoke covered hazardous waste transfer station with dedicated fire rated storage bays and new secondary and tertiary containment (A)
- Packaging recycling area with retaining wall and sealed drainage system and bunding (B)
- Bespoke tank farm bund in the lower yard with piling for bulk storage of Oils and Oil related wastes and waters (D11)
- Upgrading of all tertiary containment and addition of additional secondary containment in lower yard storage areas and local collection sumps

The areas outside of storage areas or hazardous waste processing areas are considered of a very low risk of contamination and will be discharged via trade effluent consent. This will be tested to ensure compliance prior to discharge to discharge to foul sewer in accordance with the discharge consent. The fixed pipework for the consent runs from the lowest corner of the lower yard area to foul sewer via fixed pipeline to Timsbury playing fields where it meets the public sewer network.

Surface water is pumped from the onsite sealed drainage system into self-bunded Tank D23 prior to testing and discharge. Tank T5 as well as Tanks T6/T7 can also be used for storing surface water if required. In extreme weather events due to the large surface area of impermeable concrete across the lower yard large quantities of rainfall are collected and retained and need to be managed.

The trade effluent discharge consent is to complement or act as contingency for uncontaminated rainwater release via the soakaway in the unmade ground parking area to the North of the lower yard. This is currently used for direct discharge from the roofs of the new transfer station building installed in 2024 via fixed pipework and gravity directly.

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Details on management of all rainfall across the site and the various storage areas is detailed within **BKP-SO-Surface Water Management Within Bunded Storage, Process Areas & Non-process Impermeable Surfaced Areas** submitted with this permit variation. Only surface water from Non-storage non-process areas will be discharged to foul sewer. Figure 2 within this document shows the areas in pink where water for discharge will be collected from. **No process effluents will be discharged to foul sewer, only uncontaminated surface water.**

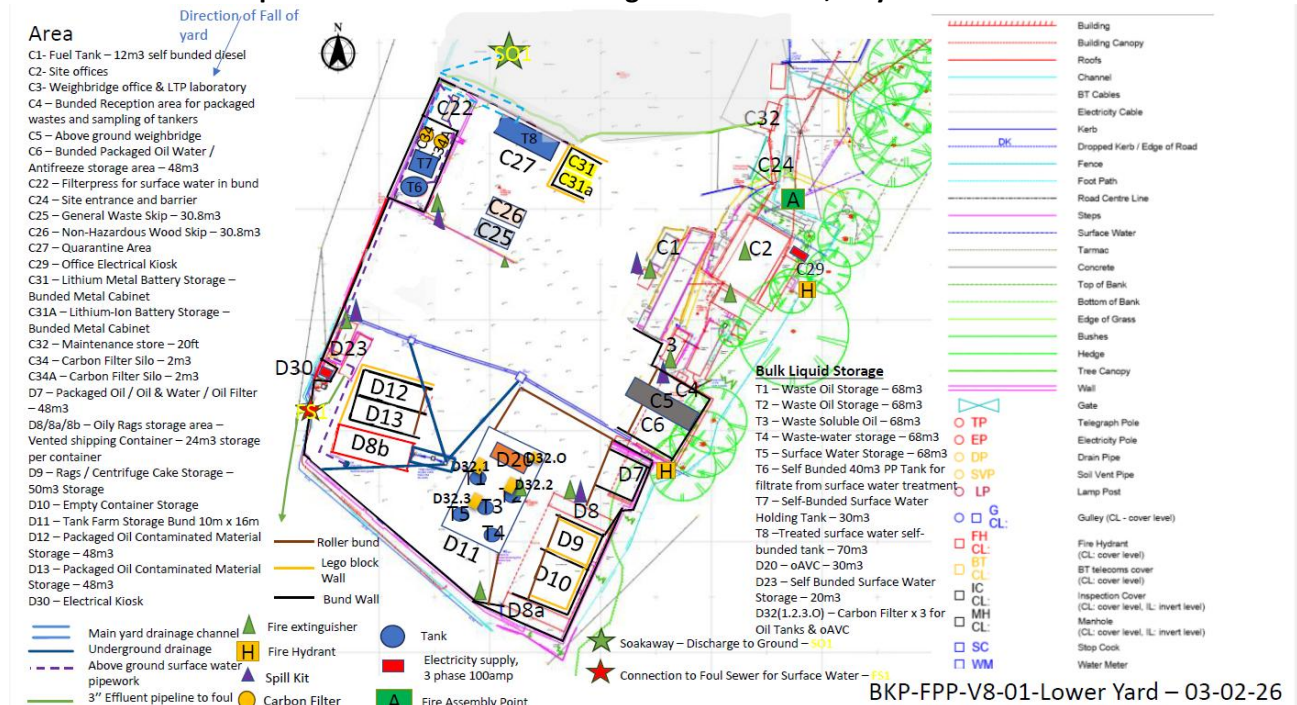


Figure 1 – Lower yard plan – Discharge to Foul sewer located below D30 FS1 - Red star, Soakaway at top left of Drawing SO1 – Green Star



Figure 2 – Drainage falls, impermeable and hardstanding and bunding and local sumps in Lower Yard

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5. OPERATION OF TRADE EFFLUENT DISCHARGE CONSENT

In the event of rainfall in the lower yard water flows to the Interceptor in the lower yard via gravity and the existing drainage system from all non-storage non process areas.

All process and storage areas are separately bunded with local sumps and this water is managed via onsite treatment or via testing and tankering to 3rd party treatment facility with any other process waters produced from onsite treatment.

Uncontaminated water is pumped from the interceptor into tank D23 via fixed pipework (above ground self bunded storage tank) or if required into tank T5 within the main tank farm. From here the effluent is sampled and tested in the onsite laboratory by BKP Chemists to ensure compliance with the trade effluent discharge consent.

In the event of any spillages or fire any surface water that may be contaminated is tested and then transferred to a third-party treatment facility. Water that falls outside of the discharge consent will also be tankered to a third party for further treatment.

Effluent is discharged from this tank via fixed pipework at a rate compliant with the requirements of the consent and within the limitations of the receiving public sewer. I.e. no discharges are permitted when there is local rainfall ongoing to ensure this does not cause compliance issues downstream.

The operator will maintain and log all discharges and record all laboratory analysis on the system and retain samples of any discharges in the onsite laboratory fridge until samples are collected by the sewage network operator compliance team in accordance with their guidance. Samples will be taken from tank D23 with a core sampler to ensure the results obtained from the onsite laboratory are representative. The results will be assessed and approved by a member of the BKP technical team prior to discharges being permitted.

Only manual discharges will be completed and when not in operation any pumps and valves linked to the public sewer will remain isolated / closed as applicable.

Only uncontaminated surface water will be discharged via this pipeline.

Discharges will be limited to the maximum daily volumes given within the consent and this will only typically be used as a contingency or to compliment the soakaway for uncontaminated rainwater.

BKP will maintain and calibrate all equipment in accordance with manufacturers instructions (likely annual calibration for flow meters and associated equipment) and ensure equipment is in good working as well as laboratory equipment for completing the testing.

6. RELATED DOCUMENTS & APPENDIXES

BKP-SO- Surface Water Management Within Bunded Storage, Process Areas & Non-process Impermeable Surfaced Areas

Details on the bunding and the site infrastructure is included within supporting document ***BKP-SO-Appendix 1 - Hazardous Waste Secondary Containment by Site Area for Waste Storage.***

Details on area covered by hardstanding in the lower yard is included as ***BKP-SO-Appendix 2 - Lower Yard Drainage, Hardstanding and Impermeable Annotated*** (also included as figure 2 within this document).

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Details on the overall process flow for rainwater management is included within **BKP-SO-Appendix 3 - Rainfall and Surface Water Management Process Flow**. The areas considered process or storage areas are detailed within this document by area.

BKP- BAT Assessment - Discharge to Foul Sewer of Uncontaminated Surface Water

NB: You must not proceed to sign this form if you feel you do not fully understand the methods and procedures outlined in this Standard Operating Procedure

Print: Sign: Date.....

Signed off by:

..... Director / Manager / Supervisor

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