

Trade Effluent – Guidance Notes on the Trader Action Plan (TAP)

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A trader is required to complete a Trader Action Plan (TAP) when a discharge has been assessed as Non-Compliant, Seriously Non-Compliant, or when routine analysis shows a serious parameter failure.

TAPs give dischargers the opportunity to take responsibility for investigating and resolving non-compliance within a defined period of time. In addition, a TAP offers reassurance of a trader's commitment and ability to manage their effluent discharge and thus comply with the limits specified in their Consent.

Where possible, Scottish Water will take no further action following failures occurring whilst an approved TAP is underway. However, in the event of serious fails which impact the wastewater treatment works, further action such as cost recovery or the submission of a report to the Procurator Fiscal may be instigated.

Completing a Trader Action Plan

The TAP will detail the level of failure/non-compliance by determinand. Please follow these general guidelines when completing a TAP:

- Identify actions which are likely to adequately investigate and pinpoint the causes of the failure or non-compliance within a defined period of time.
- Identify actions to resolve the cause of the non-compliant effluent within a defined period
 of time.
- Identify how the effectiveness of the corrective action will be monitored.
- Identify the steps that can be taken to improve the management and control of the discharge.
- Identify the person responsible for each action.
- If possible, please submit a typed version of the TAP. A blank form can be found on our website at www.scottishwater.co.uk.
- Draft TAPs should be submitted in electronic format within the specified time. Once the TAP has been approved, please sign a hard copy and return it to Scottish Water.