

This form will report compliance with your permit as determined by an NRW officer

Site	MAERDY WATER TREATMENT WORKS	Permit Ref	AF3002901		
Operator/Permit holder	DWR CYMRU CYFYNGEDIG				
Regime	WaterQuality				
Date of assessment	20/12/2018	Time in	N/A	Out	N/A
Assessment type	Check Monitoring/Sampling				
Parts of the permit assessed	Operations				
Lead officer's name	Jones, Sarah Patricia				
Accompanied by					
Recipient's name/position	OSM Mailbox/ OSM Mailbox	Date issued	04/04/2019		

Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations or the licence under the Water Resources Act 1991 as amended by the Water Act 2003. A detailed explanation is captured in "Compliance Assessment Report Detail" (Section 2) and any actions you may need to take are given in the "Action(s)" (section 4). This summary details where we believe any non-compliance with the permit has occurred, the relevant condition and how the non-compliance has been categorised using our Compliance Classification Scheme (CCS). CCS Scores can be consolidated or suspended where appropriate, to reflect the impact of some non-compliances more accurately. For more details of our CCS scheme, contact your local office.

Permit conditions and compliance summary	CCS Category	Condition(s) breached
E3 - Emissions - Surface water	C2	12 the discharge shall not contain more than; (i) 6 milligrammes per litre of Total Iron
	C2	1(a) The discharge shall not contain any poisonous, noxious or polluting matter or solid waste matter.

KEY: See Section 5 for breach categories, suspended scores will be indicated as such.

A = Assessed or assessed in part (no evidence of non-compliance), **X** = Action only,

O = Ongoing non-compliance, not scored.

Number of breaches recorded	2	Total compliance score (see section 5 for scoring scheme)	62
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If the Number of breaches recorded is greater than zero, please see Section 3 for our proposed enforcement response

Section 2 – Compliance Assessment Report Detail

This section contains a report of our findings and will usually include information on:

- The part(s) of the permit that were assessed (eg. Maintenance, training, combustion plant, etc)
- Where the type of assessment was 'Data Review' details of the report/results triggering the assessment
- Any non-compliances identified
- Any non-compliances with directly applicable legislation
- Details of any multiple non-compliances
- Information on the compliance score accrued inc.
- Details of advice given
- Any other areas of concern
- Any actions requested
- Any examples of good practice
- A reference to photos taken

Condition 12(i) the discharge shall not contain more than 6 milligrammes per litre of Total Iron

Sample result was 7.1mg/l on 20/12/18 which is above the consented limit of 6mg/l

Self Reporting WATPOL received on 20/12/2018

"Iron concentrations have occasionally been elevated over the last couple of months. Investigations are on-going to determine the root cause of the elevated iron in the discharge. A number of causes have been ruled out and actions attempted which have not been successful in reducing the discharge iron concentration. The current theory is that the elevated iron is related to changes of raw water conditions coming into the works following heavy rain, and therefore the works chemistry needs to be optimised during these periods. As part of on-going optimisation works and investigations, the local Process Scientist attended site today (Thursday 20/12/2018) to trial changes to the coagulant dose on the works. Process changes had also been made this week to reduce the iron loading onto the sludge thickener, however the thickeners are still being optimised to this change."

Condition 1(a) The discharge shall not contain any poisonous, noxious or polluting matter or solid waste matter.

Copy of NRW Biological Assessment was provided to DCWW on 02/02/2019 detailing the following conclusions;

- There was a drop in macroinvertebrate biological quality (Biological Indices BMWP, NST and ASPT) downstream of Maerdy WTW discharge (NGR: SS9745498810) between Site 1 (NGR SS9745398852) BMWP 67 and Site 2 (SS9748398737) BMWP 28, indicating the discharge from Maerdy WTW is negatively impacting the biological quality of the Rhondda Fach.
- The presence of ochre in the discharge channel and on the river bed D/S of the WTW could indicate that the discharge is ferrous in nature.
- The minimum extent of the impact from Maerdy WTW is 3.3km as far as the Rhondda Fach at Ferndale (NGR ST0002597206)

EPR Compliance Assessment Report

**Report ID:
CAR_NRW0034918**

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Section 3 – Enforcement Response

You must take immediate action to rectify any non-compliance and prevent repetition. Non-compliance with your permit conditions constitutes an offence and can result in criminal prosecutions and/or suspension or revocation of a permit. Please read the detailed assessment in Section 2 and the steps you need to take in Section 4 below.

We will now consider what enforcement action is appropriate and notify you, referencing this form.

Section 4 – Action(s)

This section summarises the actions identified during the assessment along with the timescales for when they will need to be completed.

Criteria Ref.	CCS Category	Action required/advised	Due Date
See Section 1 above			
E3	C2	Investigate reasons behind elevated iron levels in supernatant discharge.	01/05/2019
E3	C2	Investigate and resolve why there is excessive ochre staining post treatment and whether there are any other inputs from the WTW that may be allowing noxious matter to enter the culvert.	01/05/2019

Section 5 – Compliance notes for the Operator

To ensure you correct actual or potential non-compliance we may

- Advise on corrective actions verbally or in writing
- Require you to take specific actions verbally or in writing
- Issue a notice
- Require you to review your procedures or management system
- Change some of the conditions of your permit
- Decide to undertake a full review of your permit

Any breach of a permit condition is an offence and we may take legal action against you

- We will normally provide advice and guidance to assist you to come back into compliance either after an offence is committed or where we consider that an offence is likely to be committed. This is without prejudice to any other enforcement response that we consider may be required.
- Enforcement action can include the issue of a formal caution, prosecution, the service of a notice and/or suspension or revocation of the permit.

See our Enforcement and Civil Sanctions guidance for further information

This report does not relieve the site operator of the responsibility to

- Ensure you comply with the conditions of the permit at all times and prevent pollution of the environment
- Ensure you comply with other legislative provisions which may apply

Non-compliance scores and categories

CCS category	Description	Score
C1	A non-compliance that could have a major environmental effect	60
C2	A non-compliance which could have a significant environmental effect	31
C3	A non-compliance which could have a minor environmental effect	4
C4	A non-compliance which has no potential environmental effect	0.1

Operational Risk Appraisal (Opra) - Compliance assessment findings may affect your Opra score and/or your charges. This score influences the resource we use to assess permit compliance.

Section 6 – General information

Data protection notice

The information on this form will be processed by the Natural Resources Wales (NRW) to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s). The NRW may also use and/or disclose it in connection with:

- Offering/providing you with its literature/services relating to environmental matters
- Consulting with the public, public bodies and other organisations (eg. Health and Safety Executive, local authorities) on environmental issues
- Carrying out statistical analysis, research and development on environmental issues
- Providing public register information to enquirers
- Investigating possible breaches of environmental law
- Assessing customer service satisfaction and improving its service
- Freedom of Information Act/Environmental Regulations request

The NRW may pass it on to its agents/representatives to do these things on its behalf. You should ensure that any persons named on this form are informed of the contents of this data protection notice.

Disclosure of information

The NRW will provide a copy of this report to the public register(s). However, if you consider that any information contained in this report should not be released to the public register(s) on the grounds of commercial confidentiality, you must write to your local area office within fifteen working days of receipt of this form indicating which information it concerns and why it should not be released, giving your reasons in full.

Customer charter

What can I do if I disagree with this compliance assessment report?

If you are unable to resolve the issue with your site officer, you should firstly discuss the matter with officer's line managers using the informal appeals procedure. If you wish to raise your dispute further through our official Complaints and Commendations procedure, phone our general enquiry number 0300 065 3000 (Mon to Fri 08.00 – 18.00) and ask for the Customer Contact team or send an email to enquiries@naturalresourceswales.gov.uk. If you are still dissatisfied you can make a complaint to the Public Services Ombudsman for Wales. For advice on how to complain to the Ombudsman phone their helpline on 0845 607 0987.

Welsh Language

If you would like this form in Welsh please contact your Regulatory Officer.