

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

Site	DUFFRYN HOUSE & GARDENS DYFFRYN ST	Permit Ref	AN0174601		
Operator/Permit holder	THE NATIONAL TRUST				
Regime	WaterQuality				
Date of assessment	07/09/2018	Time in	10:30	Out	11:40
Assessment type	Site Inspection				
Parts of the permit assessed	All				
Lead officer's name	Lewis, Kirsty				
Accompanied by					
Recipient's name/position	G Donovan/ Manager	Date issued	04/06/2019		

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
B5 - Infrastructure - Plant and equipment	C2	5. The works shall be maintained in a fully operational condition in accordance with the manufacturers recommendations
E3 - Emissions - Surface water	C1	4. The quantity and quality of the discharge shall not exceed the following: BOD 25mg, Ammonia 10mg and Total Suspended Solids 50mg
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	C4	3. Adequate facilities shall be provided for the taking of samples of this discharge at the manhole marked as SAMPLING POINT.
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	C4	11. in event of an emergency resulting or likely to result in a discharge of non-biologically treated sewage, the sewerage, the discharger shall on becoming aware of the problem, immediately notify the regulator

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	4	Total compliance score (see section 5 for scoring scheme)	91.2
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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

Apologies for the delay issuing this Compliance Report

Officers K Lewis and E Tucny attended Dyffryn Gardens National Trust to carry out an inspection of the sites sewage treatment plant. This visit was prompted on receipt of compliance samples undertaken by NRW's Sampling team being analysed for the site which failed its permitted parameters. Officers were shown to the plant by National Trust employee S Faraden.

The primary tanks were de-sludged and functioning as normal. There were two large biospiral aeration biological treatment units on site. There was no issue with the first treatment zone with plenty of aeration. The secondary treatment zone had no aeration indicating the pumps were not working and contained sludge carry over into the final effluent chamber. The alarm system was not visible and the site were not alerted to any issues with the plant. The sampling chamber was not marked.

Permit Condition Breaches

1. The sample taken produced results of BOD 159mg, Ammonia 93.5mg and Total Suspended Solids 76mg. All exceeded the legal limits. BOD exceedance by 536%, Ammonia exceedance 835% and Total Suspended Solids exceedance by 52%. All which will have a detrimental impact to water quality. This tributary feeds into the River Weycock which is currently failing under Water Framework Directive status for water quality.

Conditions breached:

Condition 4. The quantity and quality of the discharge shall not exceed the following values: Biological Oxygen Demand 25mg/l, Ammoniacal Nitrogen 10mg/l, Total Suspended Solids 50mg/l.

2. The sampling chamber was not clearly marked as required.

Condition 3 breached: Adequate facilities shall be provided for the taking of samples of this discharge at the manhole marked on the drawings

3. No aeration in the secondary chamber indicating issues with pumps thus not fully operational and no auto change over in place or the discharge would have been fully treated.

Conditions breached:

Condition 5. The works shall be maintained in a fully operational condition in accordance with the manufacturers recommendations.

4. Natural Resources Wales (NRW) were only made aware of this issue as a result of routine sampling taking place and not as a result of the permit holders contacting NRW.

Condition 11 breached: In the event of an emergency resulting or likely to result in a discharge of non biologically treated sewage the discharger shall, on becoming aware of the problem, immediately notify the regulator.

Actions

1. Investigate & Produce a report on findings (This has already been completed)
2. Repair Internal pipework
3. Replace probes and cables which operate the pump floats
4. Replace aeration pumps in the secondary chamber
5. Regular desludging of primary tank is required. Please be reminded that you need to keep the Waste Transfer Notes for the desludging for a minimum of two years to be compliant with your Duty of Care responsibilities under Environment protection Act 1990)
6. Final Effluent sample chamber to be clearly marked
7. Regular checks of the plant to be implemented into maintenance regime
8. Fully functional alarm system to alert staff to issues arising
9. Notify NRW of any issues arising on site.







The majority of these actions have been fulfilled as a result of thorough cooperation and investigation by the National Trust. Please can you confirm all actions have been completed by 30th June 2019 to Kirsty.lewis@cyfoethnaturiolcymru.gov.uk 03000 653518

EPR Compliance Assessment Report

**Report ID:
CAR_NRW0034763**

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

Site	DUFFRYN HOUSE & GARDENS DYFFRYN ST	Permit Ref	AN0174601
Operator/Permit holder	THE NATIONAL TRUST	Date	07/09/2018

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.

In respect of the above non-compliance you have been issued with a warning. At present we do not intend to take further enforcement action. This does not preclude us from taking additional enforcement action if further relevant information comes to light or offences continue.

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	C1	Thorough investigation into identifying root cause of failure, produce report and remedy accordingly	31/12/2018
B5	C2	Replace all faulty pumps and pipework and put in place a frequent maintenance regime to ensure the plant remains in full operational condition	30/06/2019
G4	C4	Inform NRW of any issue arising from the treatment plant	30/06/2019
G1	C4	Manhole needs to be clearly marked as sampling point as stipulated by the permit	30/06/2019

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.