

Compliance Assessment Report CAR_NRW0040711

Permit being assessed: CG0092001

For: WOODLANDS HOLIDAY PARK BRYNCRUG TY, held by WOODLANDS HOLIDAY PARK

At: WOODLANDS HOLIDAY PARK BRYNCRUG, BRYNCRUG TYWYN, TYWYN, TYWYN, TYWYN.

Type of assessment carried out: Site Inspection, Reason: Incident Response (Incident number: 2207762).

On 16/11/2022, between 14:00 and 15:30.

Parts of permit assessed: Whole permit

NRW Lead Officer: Simon Roberts.

Report sent to: Lyndsey Parry, Owner, on 12/12/2022.

1. Summary of our findings (full details in section 4)

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
WQ-B2 - Operations - The site	C3 Minor	Date of non-compliance 16/11/2022 with permit condition 5: Facilities should be provided by the discharger for authorised officers of the Authority to conveniently obtain representative samples at any time of the treated effluent from the final effluent collection chamber at Grid Reference SH6205 0342

Result types are explained in more detail in the 'Important Information' section below.

2. What action is required?

Criteria	Action needed	Complete by
WQ-B2	Please ensure that a final effluent sample point is made available on both PSTP's before the discharge leaves the site, i.e. pre culverts. This will also require a permit variation to reflect the actual operations on the ground	31/03/2023

Action criteria codes are listed in the 'Important information' section below.

3. What will happen next?

Any non-compliance we have identified and recorded on this form is an offence. It can result in criminal prosecution and/or suspension or revocation of your permit.

You are non-compliant with your permit.

At this time, we are issuing you with a warning for the non-compliance recorded above. Warnings may influence future enforcement response for continued or further non-compliance.

This statement does not stop us from taking additional enforcement action if further relevant information comes to light or offences continue.

4. Details of our assessment

On the 16th November 2022 Natural Resources Wales (NRW) undertook a site visit to Woodlands Holiday Park, Brynchrug, following a pollution incident report (WIRS 2207762) which was reported to NRW on the 20th October 2022.

It was stated by the owner of Woodlands Holiday Park, Mr. Lyndsey Parry, that the Package Sewage Treatment Plant (PSTP) had recently tripped, which was the cause of the pollution incident. However, by the time of the site visit the issue had been rectified and the PSTP was working once more, as such no final effluent samples were taking in order to compare pollution incident discharge to limits within discharge permit CG0092001.

It was explained during the site visit that the two new PSTP's were installed in February 2020, and had replaced the old filter bed system, which had now been removed.

It was stated that the two new PSTP's did not have a backup system in place in order to avoid any potential issues, e.g. power failure. Without a backup system it is likely that a power failure which results in the PSTP's going offline could result in a pollution incident. A substantiated pollution incident could result in enforcement measures being carried out against Woodlands Holiday Park and cost recovery from NRW. It is recommended that you look at the possibility of installing backup systems to your PSTP's.

Condition 5 of permit CG0092001 states that 'Facilities should be provided by the discharger for authorised officers of the Authority to conveniently obtain representative samples at any time of the treated effluent from the final effluent collection chamber at Grid Reference SH 6205 0342'. This grid reference is the same location as the old filter bed.

Seeing as the filter bed has now been replaced and there is no final effluent collection chamber, this would be considered a non-compliance of permit condition 5.

As such you will need to ensure that facilities are provided with both PSTP's for authorised officers to obtain representative samples of the final effluent before the effluent leaves the site, that is before the discharge reaches the roadside culverts. In order to comply with the discharge permit we will also request that you apply for a permit variation from NRW in order to correctly establish how sewage is treated at Woodlands Holiday Park (via new PSTP's rather than old filter bed), with the permit variation correctly stating how and from

where final effluent samples are taken at Woodlands Holiday Park.

Condition 2 of permit CG0092001 states that -

'The discharge shall be made in the manner and at the place specified as follows:-

Discharging via: A pipe.

Discharging to: Afon Fathew

At OS Grid Ref: SH6200 0320.'

A discharge point is the point at which the permitted discharge enters the environment. During the site visit on the 16th of November it was unclear how the final effluent discharge from the two PSTP's reached the Afon Fathew - did the discharge travel via a pipe to the permitted discharge point, or did the discharge join a watercourse/ditch on its way to the discharge point?

We therefore request clarification on how the discharges from Woodland Holiday Park PSTP reach Afon Fathew. Are there two separate discharges considering that two PSTP's are in use at opposite sides of the Holiday Park, or do the discharges join up on their way to the discharge point? Should the discharge enter the environment before the permitted discharge point, e.g. a watercourse, then a permit variation might be required so that the permit correctly reflects the operations on the ground.

We request that this information is provided to NRW by the 31st of March 2023 in report form, along with accompanying photographs to show how the discharge is made at Woodlands Holiday Park.

Natural Resources Wales would like to thank you for your time during the site visit on the 16th of November 2022.

Please note any reference within the CAR/ permit to the Environment Agency means Natural Resources Wales.

In this document 'Natural Resources Wales' means the Natural Resources Body for Wales established by Article 3 of the Natural Resources Body for Wales (Establishment) order 2012.

If you have any queries about this report, or to discuss completion of any actions, please contact the NRW Officer named above.

Important information

Legal status of this report

Your permit is issued to you under the Environmental Permitting Regulations. You have a responsibility to comply with the conditions of your permit and prevent pollution/harm to the environment. You must also ensure that you comply with any other relevant legislation that may apply to your site's operations.

This report explains the findings of our assessment and any action you are required to take. We categorise non-compliance using our guidance for assessing non-compliance at regulated sites.

When we find potential non-compliance/s we will normally give you advice on how to maintain compliance.

To correct non-compliance, we may:

- require you to take specific actions
- issue a notice
- review the conditions of your permit.

Any advice and guidance we give will be without prejudice to any other enforcement response that we consider may be required.

Assessment results and non-compliance categories (used in section 1):

Assessment result	Description
Assessed (A)	Assessed or assessed in part, no evidence of non-compliance found
Action only (X)	Action only relating to the activity assessment
Ongoing (O)	Ongoing non-compliance, not scored

Non-compliance category	Description
C1 Major	Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property
C2 Significant	Potential to have a significant impact or effect on the environment, people and/or property
C3 Minor	Potential to have a minor or minimal impact or effect on the environment, people and/or property
C4 No environmental impact	Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property

If your assessment result in Section 1 is suspended, what does this mean?

In line with our guidance, we may suspend non-compliance for up to six months to allow time for remedial action to be taken. These will be re-instated if the action is not completed.

Full list of water quality action criteria (used in section 1 and 2):**WQ A: Management**

- WQ-A1 General management

WQ B: Operations

- WQ-B1 Permitted activities
- WQ-B2 The site
- WQ-B3 Operating techniques
- WQ-B4 Improvement programme
- WQ-B5 Pre-operational conditions

WQ C: Emissions and monitoring

- WQ-C1 Emissions to water
- WQ-C2 Emissions to land
- WQ-C3 Emissions of substances not controlled by emission limits
- WQ-C4 Installation of monitoring boreholes

WQ D: Information

- WQ-D1 Records
- WQ-D2 Reporting
- WQ-D3 Notifications

Enforcement response

Any permit condition non-compliance is an offence and we may take legal action against you. Action we take can include prosecution, serving a notice on you and/or suspension or revocation of your permit. See our Enforcement and Sanctions Guidance for further information.

Data protection notice

You should make sure that anyone named in this report knows that the information it contains will be processed by Natural Resources Wales to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s).

We may also use and/or disclose the report in connection with:

- offering or providing you with our literature or services relating to environmental matters
- consulting with the public, public bodies and other organisations (e.g. 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 our service
- Freedom of Information Act or Environmental Information Regulations requests.

We may also pass it on to our agents or representatives to do these things on our behalf.

Disclosure of information – this report will be available to view on-line

If you think this report contains commercially confidential information that should not be placed on our public register, you must contact your local Natural Resources Wales office within **fifteen working days** of receiving this report, using the contact details in the accompanying email or letter. You must give a full explanation of why it should not be

added to our public register, including specifying which information is commercially confidential. We will assess your request and respond to you within 20 working days to let you know if we agree to your request.

What do I do if I disagree with the report or have a complaint?

If you disagree with this compliance assessment report, you should contact the lead officer without delay to discuss your concerns.

If you are unable to resolve the issue with the lead officer or their line manager you should contact our Customer Contact team on 0300 065 3000 (Monday to Friday 08:00 – 18:00), or email enquiries@naturalresourceswales.gov.uk for details of how to raise your dispute further through our Complaints and Commendations procedure.

If you are dissatisfied with our response, you can contact the Public Services Ombudsman for Wales by phone on 0300 7900203 or by email at ask@ombudsman.wales

Welsh Language Standards

We are committed to establishing Natural Resources Wales as a naturally bilingual organisation. We will provide compliance reports in your preferred language.