

Compliance Assessment Report CAR_NRW0040467

Permit being assessed: CG0420201

For: PENDINAS WATER TREATMENT WORKS, held by Hafren Dyfrdwy Cyfyngedig
At: RUTHIN ROAD, LLANDEGLA, WREXHAM, WALES, LL11 5UL.

Type of assessment carried out: Check Monitoring/Sampling, Reason: Routine.
On 11/03/2022.

Parts of permit assessed: Monitoring and Reporting conditions

NRW Lead Officer: Callum Brannan.

Report sent to: Hafren Dyfrdwy Mailbox, Hafren Dyfrdwy Mailbox, on 06/03/2023.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
WQ-C1 - Emissions and monitoring - Emissions to water	C3 Minor	3.1.1 The limits given in schedule 3 table S3.1 shall not be exceeded.

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

2. What action is required?

Criteria	Action needed	Complete by
WQ-C1	Increased the frequency of site observations and manual tests and improve on site dichlorination.	04/04/2023

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 30th March 2022 NRW were notified of a permit breach of an OSM upper tier failure for total chlorine at Pendinas WTW CG0420201 that took place on the 11th March 2022.

Under condition 3.1 Emissions to water - 3.1.1 states that 'The limits given in schedule 3 table S3.1 shall not be exceeded'.

The permitted upper tier level for total chlorine to water is 0.05mg/l. On this occasion, levels of 0.09mg/l were detected from the samples taken by HD.

Environmental Permitting (England and Wales) Regulations 2016 Schedule 5 Notification	
Water Company Name	Hafren Dyfrdwy
Self Monitoring Regime	OSM
Type of Notification	UT Failure
Previous Exceedences (last 12 months)	(none)
Date and Time of sample	11/03/2022 11:00
Discharge Location	SJ 2441 5332
Consent Number	CG0420201
Failing consent parameter	Total Chlorine
Consent limit & units of measurement	0.05 mg/l (UT limit) Total Chlorine
Analytical result & units of measurement	0.09 mg/l Total Chlorine
Comments	Awaiting Manganese and Aluminium results Sampling frequency already increased to maximum 12 p.a. pro rata

The following actions were identified by HD to complete in order to ensure the total chlorine emissions do not exceed the limits included in the permit:

Site operations have increased the frequency of site observations and manual tests – This will ensure that we are dechlorinating the wash water sufficiently. This is recorded on site and reviewed weekly by the treatment process team (Appendix 3). A review of the data collected since that time has shown that we are adding additional tablets as per plan and our weekly chlorine checks show that we are now operating within the discharge consents.

- Improving on site dechlorination - There are ongoing investigations into improving both the current facility, and also reinitiating the 'return to the head of the works' flow. This will enable us to dechlorinate the water more effectively and reduce the volume of chlorinated water entering the waste water tank, and therefore the discharge point. A scoping visit was carried out on the 24th March to review possible engineering solutions:

- In order to improve the site dechlorination we are investigating the construction of a dechlorination chamber, to be located after the supernatant tank. This will enable us to dechlorinate the flow in a more controlled manner than currently.
- We also are carrying out an investigation and remedial work to restart the ability to return the washwater back to the water treatment processes, rather than discharging it from site. In order to do this we are progressing several actions, including reinstating online turbidity monitoring and optimising the filter wash times.

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.