

Compliance Assessment Report CAR_NRW0042448

Permit being assessed: AN0310001

For: STP SERVING 1-7 CWRT GRIFFIN, held by CWRT GRIFFIN MANAGEMENT COMPANY

At: RUDRY, CAERPHILLY, MID GLAMORGAN, WALES, CF83 3JQ.

Type of assessment carried out: Site Inspection, Reason: Routine.

On 04/09/2023, between 09:30 and 10:19.

Parts of permit assessed: All parts

NRW Lead Officer: Megan Jones.

Report sent to: Cwrt Griffin Management Company, Cwrt Griffin Management Company, on 14/09/2023.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
WQ-C2 - Emissions and monitoring - Emissions to land	C3 Minor	1.1.1 The operator shall manage and operate the activities: (a) in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances and those drawn to the attention of the operator as a result of complaints.
WQ-B2 - Operations - The site	C3 Minor	3.3.1 Permanent means of access shall be provided to enable sampling/monitoring to be carried out in relation to the emission points specified in schedule 3 tables S3.1, S3.2 and S3.3 unless otherwise agreed in writing by the

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
		Environment Agency.

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

2. What action is required?

Criteria	Action needed	Complete by
WQ-C2	Ensure all homeowners/occupiers (new and old) that use the PTP are made aware of what can and cannot be put into the system.	16/10/2023
WQ-B2	Provide permanent means of access to enable sampling / monitoring to be carried out.	16/10/2023

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

Site report

I (Megan Jones; Environment Officer) arrived at 1-7 Cwrt Griffin site on Monday 4th September 2023 at 09.24 to conduct an inspection regarding a discharge into land of secondary treated sewage effluent *via* an infiltration system; permit number (AN0310001). The weather at the time of the inspection was clear, sunny and warm. The site inspection commenced at 09.30. The package treatment works (PTP) is a Conder EP50 Clereflo Treatment plant with a 9m³ capacity.

I identified the location of the PTP (Fig. 1).



Figure 1. Location of the PTP.

Once the location of the PTP was identified, I attempted to locate the effluent discharge point using the NGR provided on the permit (ST 19230 86580). However, the discharge point was overgrown with vegetation making it inaccessible and impossible to ensure this was correct as *per* the permit (Fig. 2 & 3). Consequently, I was unable to check to see the quality of the effluent discharge to identify whether there was any pollution occurring. I did walk over the grassed areas near to the location of the sample point and there was no evidence of sewage liquor or solids or fungus underfoot.



Figure 2 & 3. Overgrown inaccessible area where the discharge sample point is presumably located.

I then attempted to inspect the chambers of the PTP. There were no odours coming from Chamber 1 or 2 (Fig. 4 & 5). However, Chambers 3 and 4 (Fig. 4) were unable to be opened although I was ensured that these had been recently opened following a service by Lyn Harris (Powerrod contractor) on 31.08.2023. I did notice, when inspecting chamber 1, that a large amount of soap suds were entering the PTP. Chamber 1 and Chamber 2 was free of excess solids and rag material (Fig. 6 and 7).



Figure 4 and 5. Location of PTP inspection chambers and chambers opened (inlet chamber 1 and secondary chamber 2).



Figure 6 and 7. Chamber 1 and Chamber 2 free of solids and ragging.

There were also two other access points in the far left of Fig. 4 that were inspected, these were partly openable but were dry and next to potable water points so unlikely to be linked to the PTP.

The control panel was secure with a warning light beacon, however, the light was not on to indicate that there was an issue (Fig. 8).



Figure 8. Secured control panel with warning light present but not on.

Inspection ended at 10.19.

I arranged a telephone meeting with a representative of the plant maintenance company after the visit to gain further information on Friday 8th September 2023 at approximately 15.30. From this meeting and from looking through the maintenance records provided, I was informed that there was a pump failure on the 6th September 2022 which was replaced within 36 hours (7th September 2022) of the fault occurring. I was also informed (and through looking through maintenance records) that there was a chemical imbalance which resulted in re-priming the system following a new homeowner being unaware of what can and cannot be disposed of into the PTP and putting excessive amounts of bleach into the system. I was also informed that they are considering updating the PTP and installing a sampling point closer to the PTP in the future.

Having looked through the previous CAR form issued (CAR form number: CAR_NRW0035030) to Cwrt Griffin Management Company, it was noted that the officers were also unable to access the effluent discharge point at time of inspection and Cwrt Griffin Management Company were instructed to facilitate continued access to this discharge point by 08/05/2019.

Breaches of permit

4.3.1. The Environment Agency shall be notified without delay following the detection of: (a) any malfunction, breakdown or failure of equipment or techniques, accident, or emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution

Justification: Pump was replaced on 7/9/2022 following a malfunction. The Environment Agency should, in all instances, be informed of any malfunctions or emergency repairs as and when they arise.

3.3.1. Permanent means of access shall be provided to enable sampling/monitoring to be carried out in relation to the emission points specified in schedule 3 tables S3.1, S3.2 and S3.3 unless otherwise agreed in writing by the Environment Agency.

Justification: Sampling point inaccessible for both the service contractor and inspecting officer. After speaking with contractor, it was confirmed (by the contractor) that it has always been impossible to access this monitoring point. Some talk of updating the PTP and installing a sampling point closer to the PTP in the future (by contractor).

1.1.1. The operator shall manage and operate the activities: (a) in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances and those drawn to the attention of the operator as a result of complaints.

Justification: Chemical imbalance causing inefficient treatment 06/05/2022. Chemical imbalances can lead to pollution events arising from inefficiently treated waste.

Actions required by specified date

- Provide permanent means of access to enable sampling / monitoring to be carried out.
- All homeowners/ tenants to be provided with information of what can and cannot be put into the PTP.

These actions are required by Monday 16th October 2023.

Other advisory comments

It is the responsibility of Cwrt Griffin Management Company that all homeowners/occupiers (new and old) that use the PTP are made aware of what can and cannot be put into the system.

Any future issues with the PTP need to be reported to the Natural Resources Wales as soon as reasonably practicable to ensure that a significant pollution event does not occur.

Should a new effluent monitoring/sampling point be installed the permit needs to be updated to reflect the new sampling points NGR.

Contact details

If you have any queries regarding this CAR form or to provide an update on any actions above, please contact me using the following details: Megan Jones, Environment Officer, megan.jones@cyfoethnaturiolcymru.gov.uk, 03000 65 4542.

If we do not receive the information requested within specified deadline and have not been informed as to why there is a delay then we may serve a Regulation 60 Notice requiring the information under Environmental Permitting (England and Wales) Regulations 2016.

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.