

Compliance Assessment Report CAR_NRW0040805

Permit being assessed: WQD007844

For: A PTP SERVING OFFICES AT PYE CORNER, held by NATURAL RESOURCES BODY FOR WALES

At: PYE CORNER, BROAD STREET COMMON, NASH, NEWPORT, NP18 2BE.

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

On 07/12/2022, between 12:00 and 13:30.

Parts of permit assessed: All Permit

NRW Lead Officer: Gavin Summerhill, accompanied by: Gavin Dodd, Kirsty Lewis.

Report sent to: James Cornelius, Team Leader Facilities, on 13/10/2023.

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	1.2.1 The Discharge shall be made in the manner and at the place specified as: a discharging to Julian's Reen; b at National Grid Reference ST 34521 85060; c shown marked "OUTLET AND SAMPLE POINT" on the Site Plan attached to this consent.
WQ-C1 - Emissions and monitoring - Emissions to water	C3 Minor	1.8.1 The sewage treatment plant shall be operated and maintained in accordance with good operational practice such that: (a) it remains fully operational except at times of unavoidable mechanical or electrical breakdown which shall be attended to, and the Agency informed of the failure, as soon as practicable after the failure; For the reed

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
		beds: (d) develop the reed growth to establish and maintain at least 75 percent cover of the reed bed; (e) ensure effective and even distribution of the sewage feed; (f) ensure that the sewage flow does not by-pass or short circuit within the reed bed; (g) ensure that the discharge is collected and discharged at a single point.
WQ-C1 - Emissions and monitoring - Emissions to water	C3 Minor	1.9.1 (c) The Consent Holder shall as soon as reasonably practicable report to the Agency all non-routine actions that may have adversely affected effluent quality.

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	<ul style="list-style-type: none"> Carry out a full inspection on the Sewage Treatment Plant. Produce an investigative report detailing the current set up of the waste water treatment system. Bring the Sewage Treatment Plant into compliance with permit conditions or surrender the permit. 	27/11/2023
WQ-C1	<ul style="list-style-type: none"> Carry out a full inspection on the Sewage Treatment Plant. Produce an investigative report detailing the current set up of the waste water treatment system. Bring the Sewage Treatment Plant into compliance with permit conditions or surrender the permit. 	27/11/2023
WQ-C1	<ul style="list-style-type: none"> Carry out a full inspection on the Sewage Treatment Plant. Produce an investigative report detailing the current set up of the waste water treatment system. Bring the Sewage Treatment Plant into compliance with permit conditions or surrender the permit. 	27/11/2023

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.

We are currently considering taking enforcement action against you for the non-compliance recorded above. We will contact you in due course.

4. Details of our assessment

Site Report

On Wednesday 7th December 2023 I visited NRW Offices at Pye Corner, Broad Street Common, Nash, Newport. NP18 2BE to carry out a permit inspection on their Sewage Treatment Plant. Consent Number NPSWQD007844. I arrived on site at 10.30am accompanied by Kirsty Lewis and Gavin Dodd. The weather conditions were dry and overcast. Our inspection commenced at 10.40am.

Observations

We referred to the site map to identify the location of the consented discharge point. NGR ST 34521 85060. Tertiary treated sewage effluent containing no trade effluent. Discharge via The sewage treatment plant, filter tank and reed beds to Julians Reen. We could not visually see the reed bed or discharge point to Julians Reen. See photo 1 below.

Photo 1 (location of reed bed/discharge point)



At this point a Natural Resources Wales representative arrived on site. We spoke with him and asked if he knew what the current waste water system was on site. He advised that the Sewage Treatment Plant and Reed Beds were filled in and landscaped over approximately 10 years ago. He stated that the current system is a Chamber/Cess Pit. See photo 2 below.

Photo 2 (Current system, Chamber/Cess Pit)



We lifted the cover on the chamber for a visual inspection. The chamber was approximately 3 meters deep and a slow trickle of water was present within the chamber. See photo 3 below.

Photo 3 (Inside of chamber)



We continued our discussion regarding the set up of the waste water system and was advised that the chamber has an alarm connected and the alarm flashes when the waste water has reached a certain level within the chamber and the chamber needs emptying. At this point arrangements are made to have the chamber emptied. See photo 4 below.

Photo 4 (Chamber alarm system)



During my observations several breaches were identified.

• **Breaches of permit condition:** ·

- **1.2.1** The Discharge shall be made in the manner and at the place specified as:
 - a** discharging to Julian's Reen;
 - b** at National Grid Reference ST 34521 85060;
 - c** shown marked "OUTLET AND SAMPLE POINT" on the Site Plan attached to this consent.

Justification

The discharge/sample point stipulated in the permit is inaccurate. There is no evidence of a sample point at specified location or a discharge to ground or water.

- **1.8.1** The sewage treatment plant shall be operated and maintained in accordance with good operational practice such that:

(a) it remains fully operational except at times of unavoidable mechanical or electrical breakdown which shall be attended to, and the Agency informed of the failure, as soon as practicable after the failure;

For the reed beds:

(d) develop the reed growth to establish and maintain at least 75 percent cover of the reed bed;

(e) ensure effective and even distribution of the sewage feed;

(f) ensure that the sewage flow does not by-pass or short circuit within the reed bed;

(g) ensure that the discharge is collected and discharged at a single point.

Justification

No notification or report submitted regarding the change to the waste water treatment

system. No notification or report submitted regarding the removal of the reed bed, discharge point and sample point.

1.9.1

- **(c)** The Consent Holder shall as soon as reasonably practicable report to the Agency all non-routine actions that may have adversely affected effluent quality.

Justification

No notification or report submitted regarding changes to the waste water treatment system.

Action required by dates specified:

- Carry out a full inspection on the Sewage Treatment Plant.
- Produce an investigative report detailing the current set up of the waste water treatment system.
- Bring the Sewage Treatment Plant into compliance with permit conditions or surrender the permit.

These actions are required by the 27th November 2023.

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:

Gavin Summerhill (Environment Officer)

gavin.summerhill@cyfoethnaturiolcymru.gov.uk

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.