

## Compliance Assessment Report CAR\_NRW0042810

**Permit being assessed:** BB4002501

For: VALE BUSINESS PARK STW VALE BUSINES, held by LEL (PROPERTIES) LTD  
At: VALE BUSINESS PARK STW VALE BUSI, VALE BUSINESS PARK LLANDLOW,  
LLANDLOW, LLANDLOW, LLANDLOW.

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

On 13/10/2023, between 11:30 and 12:15.

Parts of permit assessed: Relevant Conditions

**NRW Lead Officer:** Alex Grabham, accompanied by: Alexander Grainger.

**Report sent to:** Karren Tilley, Managing Director, on 27/11/2023.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
WQ-D1 - Information - Records	Action only (X)	
WQ-D1 - Information - Records	Action only (X)	
WQ-D1 - Information - Records	Action only (X)	
WQ-B2 - Operations - The site	Assessed (A)	
WQ-B1 - Operations - Permitted activities	Assessed (A)	

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

### 2. What action is required?

Criteria	Action needed	Complete by
WQ-D1	Provide the last transfer note for desludging	07/12/2023
WQ-D1	Provide a copy of the last quarterly and weekly maintenance report	07/12/2023
WQ-D1	Provide a copy of the service schedule	07/12/2023

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.

**At this time, we do not intend to take any further action.**

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

Reissued due to enforcement response error on CAR form. Corrected to say no further action.

The Site visit was undertaken on the 13 October 2023 I was accompanied by Environment Officer Alex Grainger and met with Karen Tilley Managing Director and the plant maintenance company manager and operator. The weather was cloudy with intermittent rain.

### **Site Report**

During the visit maintenance plans and schedules were discussed with yourself and your maintenance contractor. I was informed that routine maintenance is completed weekly, along with more in-depth maintenance on both a monthly and quarterly basis. During the visit moss growth was visible on the trickling filter along with several blocked water outlets on the rotating arms (Photo 1). However, I was informed the quarterly maintenance visit was due the following week. I acknowledge that since my visit I have received photos confirming that the work has been completed to remove the moss and clean the jets as stated.



Photo 1

We discussed the continuing issue of groundwater infiltration to the sewage network on the industrial estate causing the treatment plant to receive high volumes during wet weather. This was evident while onsite with the storm tanks in use (Photo 2). We discussed the negative impact this could have on the treatment process. I acknowledge that the industrial estate is not managed by yourselves, and that camera surveys and remediation work is taking place under the instructions of the industrial estate land agent. However, I would encourage you to continue to work with the industrial estate land agents to rectify the issue as soon as practicable. I was informed that no further changes to loadings have occurred since my previous visit.



Photo 2

We discussed that you continue to have your own samples taken quarterly and I acknowledge that the results are sent to myself when you receive them.

During the visit you raised concerns that the routine samples taken by NRW were not from the designated sample point onsite. I have contacted the sampling team and can confirm that the sample location is correct on the sampling documentation and that the sample is taken from the designated sampling point onsite.

**Action required:** During the visit I requested the last transfer notes for desludging, a copy of the last quarterly and weekly maintenance report and service schedule. Please could you provide this?

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.

Overall, the treatment plant appeared to be in a well-maintained condition, and I acknowledge the work that you have undertaken to ensure this (Photos 3 and 4).



Photo 3



Photo 4

**Breaches of permit condition:**

No breaches of permit conditions were identified during the site visit.

**Other advisory comments:**

As previously mentioned, please continue to work with the trading estate land agents to reduce infiltration to increase the resilience in the treatment works.

**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: Alex Grabham, Environment Officer, Alex.Grabham@naturalresourceswales.gov.uk, 03000 65 4654

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](mailto: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](mailto: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.