

Compliance Assessment Report CAR_NRW0042900

Permit being assessed: AN0305101

For: SIX BELLS MINEWATER TREATMENT SCHEM, held by The Coal Authority
At: SIX BELLS MINEWATER TREATMENT, FORMER EMPRESS CAR SALES SITE, ADJ ABERTILLERY LEISURE CENTRE, ABERTILLERY, .

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

On 29/11/2023, between 10:40 and 12:00.

Parts of permit assessed: Permit compliance

NRW Lead Officer: Elis Nuttall.

Report sent to: Alice Mellor, Environmental Compliance Manager, The Coal Authority, on 05/12/2023.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
IR1A - Management - General management	Action only (X)	
WQ-B3 - Operations - Operating techniques	Action only (X)	
WQ-A1 - Management - General management	Action only (X)	
WQ-A1 - Management - General management	Action only (X)	
WQ-B3 - Operations - Operating techniques	Action only (X)	
WQ-D1 - Information - Records	Action only (X)	
WQ-B3 - Operations - Operating techniques	Action only (X)	

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

2. What action is required?

Criteria	Action needed	Complete by
IR1A	Provide information on when the settlement lagoons were last de-sludged.	19/12/2023
WQ-B3	Secure the flocculant matting further to ensure they are not dislodged and block on site culvers/drainage system	19/12/2023
WQ-A1	Inform NRW of the long term strategy for flocculant or dosing regimes on site to ensure Fe limits can be adhered to	19/12/2023
WQ-A1	Provide information on the maintenance schedule for the drying bed	19/12/2023
WQ-B3	Confirm the purpose of the black pipe located at SO2195503555	19/12/2023
WQ-D1	Provide site monitoring data for the prior 12 months of the visit on 29/11/2023.	Already completed
WQ-B3	Provide details on the velocity reduction infrastructure and	19/12/2023

Criteria	Action needed	Complete by
	associated maintenance schedule	

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

Site Visit Report

This report details the site visit made on the 29/11/2023 to Six Bells mine water treatment scheme, permit reference number EPR- AN0305101.

NRW Officers Elis Nuttall (EN) and Kate Rodgers (KR) attended Six Bells mine water treatment scheme at Aberbeeg Road, Aberbeeg, Abertillery, NP13 2EG for a permit compliance visit at 10:40 and were met by Alice Mellor (AM) (Environmental Compliance Manager, The Coal Authority) and Charlie Powell (CP) (Severn Trent). The weather was dry, clear and cold.

Prior to this visit EN was informed by AM that the treatment scheme had breached its consented Fe levels on both the 31/10/2023 (3.21mg/l) and 11/11/2023 (3.5mg/l). This breach, although discussed on site, does not form part of this compliance visit and is addressed in CAR_NRW0042851 which will be issued separately. A data monitoring audit will also be undertaken to assess the flow and sample monitoring from the 12 months prior the site visit.

Site Observations

General Observations

The site is a mine water treatment scheme treating and removing dissolved iron (Fe) from mine water discharge. The consented level of Fe permissible in the discharge is set at 3mg/l and at a discharge rate of 6,912m³/day. The site was operational at the time of the visit. It is noted that a new cascade has been developed and built on site since the last compliance visit to increase the efficiency of Fe removal of the site.

Site infrastructure and compliance assessment

A brief run through of site function and operations were given where the Fe removal process was explained and what each stage of the treatment process does. As part of this conversation it was noted that dosing of hydrogen peroxide has now ended at site. The purpose of this was to trial if the system can meet consented levels of Fe without additional chemical dosing. It was noted that the installation of a new permanent dosing unit on site

may be cost prohibitive and as part of the Coal Authorities' strategic reviews on spending it was seen as a viable option to improve funding allocation responsibly.

There were moderate flows at the time of the visit with CP noting pumping rates are generally held between 37l/s - 40l/s . The cascade looked to be in a good condition with no excessive build-up of Fe deposits present. This is evidenced in Figure 1. Effective distribution of the effluent was present with no excessive build-up of debris. This is evidenced in Figure 2. Visual inspections are undertaken regularly and the cascade is cleaned as needed to maintain effective aeration of the discharge.



Figure 1 – Site visit photo: The condition of the cascade at the time of the visit.
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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.