

Compliance Assessment Report CAR_NRW0042913

Permit being assessed: BB3592HK

For: Llys Nini Animal Centre, held by RSPCA Llys Nini

At: R S P C A, Llys Nini Animal Centre, Penllergaer, Swansea, Swansea, SA4 9WB.

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

On 30/11/2023, between 11:00 and 11:45.

Parts of permit assessed: Operations

NRW Lead Officer: Gareth Martin, accompanied by: Catherine Tucker.

Report sent to: Gary Weeks, Centre Manager , on 07/12/2023.

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	Assessed (A)	
WQ-D1 - Information - Records	Assessed (A)	
WQ-D3 - Information - Notifications	Assessed (A)	

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

2. What action is required?

No action required.

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

A site inspection was carried out on Thursday 30th November 2023, the first inspection since the installation of a new package treatment plant and issue of a new permit. The aim of this visit was to assess the shelters compliance with its water quality discharge permit, the following criteria were assessed:

Assessment of 3 - Emissions & Monitoring

We were shown around the package treatment plant that appeared to be in good working order and well maintained, including a 20 micron filter screen unit for removal of Toxocora,

a requirement of 2.3 Operating Techniques.

The treatment plant discharged while we were on site and through the inspection chamber and the outfall the discharge appeared clean and clear and there was no visible pollution in the way of sewage fungus, etc, in the ditch.

It could not be seen at the time, but the roughly 2 meters of pipe between the final Toxocora filter unit and the outfall was confirmed via email on 01.12.23 to be perforated pipe as per the requirement in Schedule 1 of your permit. There is a slight discrepancy between the wording in the permit compared to the original application in regards to the perforated pipe. I have asked for clarification on this and will feed back to you when clarified.

As per requirement 3.3.1 of your permit, the discharge point and inspection chamber before this can be easily accessed if sampling was required.

Assessment of 4.1 - Records

You supplied us with evidence in the form of water meter records which demonstrated an average daily usage of 3-4m³, evidencing that you are discharging under the permitted 7.5m³ limit (based on your information only a small amount of surface water is entering the foul network, and only under very heavy rainfall and therefore you should only be discharging equal volume to incoming potable water) as well as results from your 6 monthly discharge sample testing evidencing that other than an issue causing a raised suspended solids result in February 2023, your discharge is consistently within the permitted limits for the parameters included in Schedule 3 of your permit (BOD, Suspended Solids, Ammoniacal Nitrogen & Visible Oil & Grease)

Assessment of 4.3 - Notifications

It has been discussed internally and agreed that not reporting the elevated suspended solids reading from February 2023 is not a permit non-compliance as there is no permitted requirement to sample your discharge. It is beneficial to sample as in this case the elevated result lead you to find and repair a fault with the system, which was then evidenced by the sample results from May 2023, in which the suspended solids result had returned to a compliant level. You would only be required to notify Natural Resources Wales if you believed the discharge was actively causing pollution, if this was the case the Notification template found on page 10 of the permit can be completed and emailed to ICC@cyfoethnaturiolcymru.gov.uk.

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.