

Compliance Assessment Report CAR_NRW0043230

Permit being assessed: BN0168802

For: Clarach STW CSO, held by DWR CYMRU CYFYNGEDIG

At: Nr 1 Llys Rhyd, Clarach, Aberstwyth, SY23 3DT.

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

On 05/12/2023, between 09:52 and 10:27.

Parts of permit assessed: 2.1; 2.2; 2.3; 3.1

NRW Lead Officer: Bethan Lewis, accompanied by: Heidi Markham.

Report sent to: CARS mailbox, CARS mailbox, on 31/01/2024.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
WQ-B1 - Operations - Permitted activities	Assessed (A)	
WQ-B2 - Operations - The site	Action only (X)	
WQ-B3 - Operations - Operating techniques	Assessed (A)	
WQ-C1 - Emissions and monitoring - Emissions to water	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
WQ-B2	Provide confirmation of the location of the storm discharge point at Clarach STW.	28/02/2024
WQ-C1	Confirm the date the initial fault with the EDM recorder/telemetry was identified at Clarach STW and the date it was rectified. If the fault has not been rectified, confirm how and when it will be rectified.	28/02/2024

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

This was a pre-planned site inspection at Clarach Sewage Treatment Works (STW)

Combined Sewer Overflow (CSO) (BN0168802) carried out by Natural Resources Wales (NRW) Officers Bethan Lewis and Heidi Markham. The NRW Officers were accompanied during the inspection by Dŵr Cymru Welsh Water (DCWW) Operatives including an Operational Supervisor, Operations Coordinator and Performance Manager.

For observations concerning Clarach STW itself (BN0168801), please refer to Compliance Assessment Report (CAR): CAR_NRW0043229.

Summary

The site inspection commenced at 09:52 hours on 05 December 2023 and concluded at 10:27 hours. The weather at the time of the inspection was cold but dry with sunshine and clouds. The previous day's weather consisted of some showers.

The NRW Officers were led through the storm overflow process by the DCWW Operatives.

At the inlet to the works as shown in photograph 1 below, flows above a certain level are diverted to storm through a vertical bar screen. At the time of the inspection, the asset was not discharging to storm. As shown in photograph 1, a small amount of leaf litter was present within the inlet chamber. If not cleared, leaf litter has the potential to impact the wider treatment process and/or block the overflow screen. It is understood that since the site inspection, DCWW have cleared leaf litter from the inlet chamber.



Photograph 1: Clarach STW inlet and overflow bar screen

Whilst permit BN0168802 does not specify the type of overflow screen required at Clarach STW, since the site inspection, DCWW have replaced the vertical bar screen with a grid screen as shown in photograph 2 below (photograph courtesy of DCWW). Replacing the bar screen with a grid screen will reduce the risk of larger particles and rag discharging to storm. Without automatic wipers, DCWW are encouraged to monitor and clean the screen as necessary to prevent blockages.



Photograph 2: New grid screen installed at point of overflow

Storm discharges from Clarach STW are monitored by the Event Duration Monitoring (EDM) recorder which sits above the inlet chamber as shown in photograph 3 below. During 2021 and 2022, the EDM recorder recorded no discharges from the CSO. It is NRW's understanding that a fault with the recorder/telemetry at the site in 2022 may have resulted in storm discharges not being recorded for a period of time. As condition 3.1.4 of permit BN0168802 requires DCWW to remedy any failures with the EDM recorder as soon as reasonably practicable, NRW ask DCWW to confirm the date the initial fault with the EDM recorder/telemetry was identified and the date it was rectified. If the fault has not been rectified, NRW ask DCWW to confirm how and when it will be rectified. NRW ask DCWW to supply this information by no later than the **28 February 2024**.



Photograph 3: EDM recorder above Clarach STW inlet

It was the DCWW Operatives' understanding at the time of the site inspection that flows discharging to storm at Clarach STW discharge into an unnamed tributary of the Afon Clarach

beside the STW. The CSO outfall was not inspected at the time of the site inspection, however the NRW Officers did not observe anything of concern within the unnamed tributary which would indicate that the discharge was having an impact on the watercourse.

As the suspected CSO discharge point is different to the discharge point recorded in permit BN0168802 which states that storm sewage enters the Afon Clarach at SN 59940 83898, NRW ask DCWW to provide confirmation of the location of the storm discharge point at Clarach STW by no later than the **28 February 2024**.

Final comments

We wish to thank the DCWW Operatives for accompanying the NRW Officers at the time of the above inspection and for the work carried out following the visit. If DCWW wish to discuss any aspect of this CAR, we encourage them to contact the NRW Officer noted above.

In this document 'Natural Resources Wales' means the Natural Resources Body for Wales established by Article 3 of the Natural Resources Body for Wales (Establishment) order 2012.

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.