

Compliance Assessment Report CAR_NRW0043655

Permit being assessed: BC0001501

For: CROSSHANDS WWTW, held by DWR CYMRU CYFYNGEDIG
At: CROSSHANDS WWTW, PONTARDDULAIS ROAD, CROSSHANDS,
CARMARTHENSHIRE, SA14 6NT.

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

On 13/02/2024, between 10:00 and 10:45.

Parts of permit assessed: All

NRW Lead Officer: Gavin Thomas, accompanied by: Joseph Callard.

Report sent to: CARS Mailbox, CARS mailbox, on 05/03/2024.

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-B3 - Operations - Operating techniques	Assessed (A)	
WQ-C1 - Emissions and monitoring - Emissions to water	Assessed (A)	
WQ-A1 - Management - General management	C3 Minor	1.1.1 (a) he operator shall manage and operate the activities in accordance with a written management system that identifies and minimises risks of pollution so far as is reasonably practicable, including those risks arising from operations, maintenance, accidents, incidents, non-conformances and those drawn to the attention of the operator as a result of complaints

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

2. What action is required?

Criteria	Action needed	Complete by
WQ-A1	Ensure that all harmful chemicals are stored on bunds and the bunds are maintained to provide adequate pollution	28/03/2024

Criteria	Action needed	Complete by
	prevention in the event of a spill or leak from the containers. Provide NRW with a time frame for the correct storage of the ferric chloride on site and how this will be achieved.	

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 audit carried out by Natural Resources Wales Environment officers who were accompanied by a senior Operative, Performance Manager and Regulatory Compliance officer from Dwr Cymru.

The weather was heavy rain with heavy rain also experienced in the days leading up to the visit.

General Observations

Officers were taken through the works from the inlet, through the treatment system, before finishing at the final effluent sampling station, the discharge point into the Afon Gwili was not inspected due to the distance from the site and the access being through a steep wooded valley.

The site is a Waste Water Treatment works that processes residential and trade effluent and has telemetry in place for monitoring. The permit for the site is for the discharge of secondary treated sewage effluent with nutrient removal. Substantial work ongoing on site to provide extra treatment capacity to meet tighter limits that will be on the permit from 2025.

The Process

There are 2 inlets to the works, one for domestic sewage and one for trade effluent. There is a mechanical screen in operation, with a bar screen present as a backup. The inflow to the works was reading 18.93 l/s from a meter on site.



Figure 1: Inlet to works

Storm flows were entering the storm storage tank at the time of visit due to heavy rainfall. The storm storage was located within an old primary settlement tank, this was not overflowing at the time of visit.



Figure 2: Old Primary Settlement tank acting as storm storage.

The primary settlement tank was heavily discoloured at the time of the inspection due to trade discharge from the nearby ice cream factory. This is a common problem for the works and the operator also mentioned that the works treats blood from abattoir and fats and cream from food production units in the industrial estate. The sludge is pumped into holding tanks at the works, the sludge was being removed by tanker at the time of visit.



Figure 3: Primary settlement tank discoloured at the time of the visit, large green filter bed in background

Secondary treatment is provided by aeration lanes with activated sludge. From here further treatment is achieved via sand filters and a percolating filter bed.



Figure 4: Aeration lanes

The rotation arms on the filter bed were moving free and unhindered. During the visit, the filter beds seem to work effectively with no sign of ponding or dry patches with no obvious leakages.



Figure 5: Filter bed

Following the filter bed treatment, the flow enters 2 final settlement tanks. The final tanks seemed to work effectively at the time of the visit with no signs of built-up sewage fungus.



Figure 6 Final effluent from the final settlement tanks

Breaches of permit condition:

Condition 1.1.1 The operator shall manage and operate the activities:

(a) in accordance with a written management system that identifies and minimises risks of pollution so far as is reasonably practicable, including those risks arising from operations, maintenance, accidents, incidents, non-conformances and those drawn to the attention of the operator as a result of complaints;

At the time of the visit there was one IBC of Ferric Chloride stored on the ground and not on a bund. The other bunds were full of rainwater, therefore making them ineffective if a leak were to occur. This was discussed when on site and the plan going forward is to upgrade the ferric chloride system, removing the need for IBC's and bunds. Please could you provide Natural Resources Wales with a time frame for the correct storage of the ferric chloride on site and how this will be achieved.



Figure 7 IBC's of Ferric Chloride stored on overtopping bunds

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.