

## Compliance Assessment Report CAR\_NRW0043836

**Permit being assessed:** BC0003001

For: GOWERTON WwTW, held by DWR CYMRU CYFYNGEDIG

At: GOWERTON WwTW, VICTORIA ROAD, GOWERTON, SWANSEA, SA4 3AB.

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

On 12/03/2024, between 09:15 and 11:45.

Parts of permit assessed: Parts of Operations, Emissions and monitoring, Information

**NRW Lead Officer:** Sarah Bennett, accompanied by: Hamish Osborn, Catherine Tucker, Gareth Martin.

**Report sent to:** CARS@dwrwymru.com, CARS Mailbox, on 26/03/2024.

### 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-B2 - Operations - The site                         | Assessed (A)      |  |
| WQ-B3 - Operations - Operating techniques             | Action only (X)   |  |
| WQ-B3 - Operations - Operating techniques             | C3 Minor          | 2.3.5 For the discharges specified in table S3.3a:<br>(a) The discharge shall only occur when and only for as long as the flow passed forward is equal to or greater than the overflow setting indicated due to rainfall and/or snow melt.<br>(b) Sewage can only go to storm storage if, and for as long as, the flow of sewage is equal to or greater than the storm overflow setting due to rainfall and/or snowmelt. |
| WQ-B3 - Operations - Operating techniques             | Action only (X)   |  |
| WQ-C1 - Emissions and monitoring - Emissions to water | C4 No impact      | 3.1.6 Effective from the date of installation of EDM monitoring equipment at the site:<br>(a) If the measured number of block counted spills exceeds   |

| Part of permitted activity assessed (criteria) | Assessment result | Permit condition  |
|--|-------------------|---|
|  |                   | <p>the limit specified in Table S3.1 then the operator shall:</p> <p>(i) within 3 months of the trigger breach, submit an initial report to Natural Resources Wales for approval, with reference to the Best Practice Guidance in Schedule 4 Table 4.2, and, where appropriate proposals, including timeframes, for a full investigation into the operation of the overflow including a timetable for the investigation;</p> <p>(ii) investigate the reasons for the exceedance in accordance with the approved investigation proposals and timescales.</p> |
| WQ-B3 - Operations - Operating techniques      | C4 No impact      | <p>2.3.1 For the activities (A1 and A2) referenced in schedule 1, table S1.1 the activities shall, subject to the conditions of this permit, be operated using the techniques and in the manner described in the documentation specified in schedule 1, table S1.2, unless otherwise agreed in writing by Natural Resources Wales.</p>  |

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

## 2. What action is required?

| Criteria | Action needed  | Complete by |
|----------|--|-------------|
| WQ-B3    | Please provide a report on performance of the PFET system including: an assessment of how it has performed to date and | 26/04/2024  |

| Criteria | Action needed  | Complete by |
|----------|--|-------------|
|          | an explanation of any deficiencies in treatment capacity.  |             |
| WQ-B3    | Please provide a report on the steps you propose to take (including timescales) to ensure that the all the flow conditions of your environmental permit are met.   | 27/09/2024  |
| WQ-B3    | If the PFET system continues to underperform please ensure that you are collecting sufficient data to allow the calculation/assessment of the environmental impact of the underperformance. Please note that the due date of this action is the date by which you should have considered this action and started acting on it. | 26/04/2024  |
| WQ-C1    | Please submit a report as required by Condition 3.1.6(a)(i) of the permit. This permit has the old EDM permit conditions so I would advise you to read the condition before writing and submitting the report.   | 26/04/2024  |
| WQ-B3    | Please provide the report described in the Operating Techniques or provide a reason for not being able to provide this report. If the monitoring has been superseded by other equivalent monitoring, please inform us so that we can take this into consideration.   | 31/05/2024  |

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.

#### **You are non-compliant with your permit.**

**At this time, we are issuing you with a warning for the non-compliance recorded above. Warnings may influence future enforcement response for continued or further non-compliance.**

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

#### The Inspection

On the 12/03/2024 we carried out an inspection of Gowerton Wastewater Treatment Works. There had been light rainfall during the 3 days preceding the inspection and heavy rainfall on the morning of the inspection.

We walked through the works from the inlet to the outlet accompanied by DCWW staff.

The screens were working effectively with significant amounts of rag being removed for disposal off site.

Works to improve the grit removal channel was ongoing with an extensive over pumping operation in place. The improvements will allow better maintenance and management of the grit channel and reduce the amount of debris being passed forward from the grit

chamber to the downstream treatment process.

We observed that a new standby generator had been installed alongside the pumphouse.

At the time of our inspection some of the incoming flows were being passed to the storm tanks. The tanks were full and settled storm sewage was being released to the environment.

Wastewater treatment at Gowerton WwTW consists of two parallel processes. Flows up to 612 l/s are treated by the original three stage system comprising of primary settlement, biological treatment and final settlement. Flows between 612 l/s and 913 l/s should be treated by the peak flow equivalent treatment (PFET) facility. The flows from both systems are UV treated and then blended together prior to the flow meter and final effluent sample point before being discharged via outfall. The permit allows flows above 913 l/s to be split to the storm system.

At the time we visited the site the PFET system was non-operational, having been taken off-line for maintenance (we had been informed of this in an OPNOT prior to our visit).

We were informed that maintenance was required because the PFET system was struggling to process the required flow and was suffering from a build-up of excess solids in the filter media. This causes 'blinding' and a consequent loss of treatment capacity or even blockage of the treatment cell. We understand that the system has been operated below its required performance in order to prevent this happening

The discharge of storm sewage, both to the storm tanks and the environment, whilst the PFET system was offline signifies that the pass forward flow conditions of the Environmental Permit at Gowerton WWTW will not have been met at the time we visited. Furthermore, running the PFET unit below its required capacity is likely to indicate that there has been an on-going breach of these conditions at the works.

**Action: Please provide a report on the performance of the PFET system including: an assessment of how it has performed to date and an explanation of any deficiencies in treatment capacity.**

**Action: Please provide a report on the steps you propose to take (including timescales) to ensure that the all the flow conditions of your environmental permit are met.**

**Action: If the PFET system continues to underperform please ensure that you are collecting sufficient data to allow the calculation/assessment of the environmental impact of the underperformance. Please note that the due date of this action is the date by which you should have considered this action and started acting on it.**

The primary tanks, ferric doser and biological treatment systems were inspected and appeared to be functioning normally.

All six final tanks were in operation. There appeared to be some evidence of pinflock in both the original four tanks as well as the two larger new ones. Despite this, the effluent passing over the weirs appeared clear and free from solids.

The UV plant and control equipment was checked and found to be operating as expected.

All appeared to be in order with the final effluent sample point. The WWTD autosampler was in place but was not in use at the time we visited. The final effluent was clear. The sample points on site reflected the site plans in the permit.

#### Additional comments on compliance

The Event Duration Monitoring (EDM) monitoring equipment installed is providing over 99% complete data. The spill trigger limit was exceeded in 2023 but we did not receive a report. Condition 3.1.6(a)(i) requires you to submit an initial report to NRW within 3 months of a spill trigger exceedance.

**Action: Please submit a report as required by Condition 3.1.6(a)(i) of the permit. This permit has the old EDM permit conditions so I would advise you to read the condition before writing and submitting the report.**

The sampling frequency for monitoring the final effluent is 12 times per year for OSM limits and 24 times per year for UWW limits. On site continuous monitoring is also carried out. For 2023, apart for an unexplainable BOD LUT exceedance in January, the final effluent result have been within the numeric limits of the permit.

My understanding is that the UV conditions have been satisfied and the works is not at risk of failing its DWF conditions.

Condition 2.3.1 requires that the discharge activities permitted (final effluent and storm discharge) shall, subject to the conditions of this permit, be operated using the techniques and in the manner described in the documentation specified in schedule 1, table S1.2, unless otherwise agreed in writing by Natural Resources Wales. Notably the Operating Technique.

The Operating Technique describes the monitoring that will take place to assess performance primarily in relation to storm discharges. I believe that you have not carried out the monitoring described in the second part of the Monitoring paragraph.

**Action: Please provide the report described in the Operating Techniques or provide a reason for not being able to provide this report. If the monitoring has been superseded by other equivalent monitoring, please inform us so that we can take this into consideration.**

Your permit will be varied soon to include the new flow conditions so it may be worthwhile checking that there are no errors in the Operating Techniques and, if necessary, requesting that these be corrected before the new permit is determined.

The permit non-compliances discussed above have been recorded in this Report. These non-compliances are in contravention of Regulation 38 (2) of the Environmental Permitting (England and Wales) Regulations 2016 which states that it is an offence for a person to fail to comply with or to contravene an environmental permit condition.

This CAR contains a Warning for the non-compliance of Condition 2.3.5 (a) and (b) relating storm flows.

Formal advice and guidance is given for all other non-compliances.

Thank you.

End.

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.