

## Compliance Assessment Report CAR\_NRW0043865

**Permit being assessed:** BP0232001

For: Reynoldson WwTW Settled Storm, held by DWR CYMRU CYFYNGEDIG  
At: Reynoldson WwTW, Burry Green, Gower, Swansea, Swansea, SA3 1BR.

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

On 19/03/2024, between 09:45 and 10:45.

Parts of permit assessed: Operations, Emissions and Monitoring.

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

**Report sent to:** CARS@dwrwymru.com, CARS Mailbox, on 28/03/2024.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
WQ-B2 - Operations - The site	Assessed (A)	
WQ-B3 - Operations - Operating techniques	Assessed (A)	
WQ-B3 - Operations - Operating techniques	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
WQ-B3	Please confirm whether the storm overflow is included in the Storm Overflow Assessment Framework for AMP 7.	31/05/2024
WQ-B3	Please provide us with a brief explanation of steps you will now take to confirm if the required flows passed forward are being met or not. This explanation should include timelines.	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.

**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

On the 19/03/2024 we carried out an inspection of Reynoldston Wastewater Treatment Works. It was dry at the time of the inspection but there had been rainfall in the morning

and during the days before the inspection.

The majority of Reynoldston WWTW is only around 5 years old having been rebuilt in a scheme to address issues with flows passed forward to full treatment. The membrane bioreactors have been replaced with a conventional treatment system. The required tertiary treatment is achieved through a sand filter. The inlet and storm tank arrangements remain largely the same.

Compliance with final effluent and storm permit conditions relevant to a site inspection were assessed during the visit. This compliance assessment report (CAR) only relates to the settled storm permit. A separate CAR has been written for compliance with the final effluent permit BC0002501.

The storm arrangements comprise of a storm separating weir and a 6 x 6 mm rotating screen at the inlet. There are 2 parallel but separate storm tanks which receive equal flows. EDM monitoring is installed on both tanks. The contents of the storm tanks are returned to the inlet automatically. Settled storm sewage is discharged to the river via an outfall located upstream of the final effluent outfall.

At the time of the visit some of the incoming flows, which were dilute and relatively free of any sewage debris, were spilling to the storm tanks via the 6mm rotating screen. The storm tanks were full and discharging to the environment. The flow monitor displays indicated that 8.6 l/s was being passed forward for full treatment and at the same time 10 l/s was being discharged. The overflow setting before any storm sewage should spill to the storm tanks is 8.5 l/s. This would indicate that at the time of the inspection the discharge appeared to be compliant with the relevant conditions of the Operating Techniques.

A pumping station discharges directly into the inlet channel. This was operating at the time and appeared to cause some turbulence which may be of concern given that the separating weir is very short.

The storm tank contents were being returned to the inlet. Normally the storm tanks would not be returned whilst the incoming flow exceed the weir setting. My understanding is that this is done at Reynoldston WwTW to recirculate the contents of the storm tank and improve the quality of any settled storm effluent that may be discharged to the environment.

The storm tanks appeared to have material floating on the top of the tanks which may be symptomatic of the tanks never fully emptying between usage.

We were informed during the visit that the intension is to create a 'hole' in the bottom of the wall which separates the 2 storm tanks so that they essentially operate as one.

The point of overflow location in the permit is incorrect. Addressing this issue has been raised in the final effluent CAR as it can be addressed via the UMON variation that has been submitted. This variation should consolidate the final effluent and settled storm permits.

The settled storm outflow was not inspected at the time of the visit due to high flows in the receiving watercourse making access dangerous. There was no visible evidence of

pollution at the bridge downstream of the outfall.

Whilst there was no evidence of non-compliance with the storm permit conditions at the time of the visit, it is my understanding that the annual EDM returns submitted to NRW indicate the number of annual storm spills is high which may indicate that spills are occurring on dry days. In addition to this, NRW has been informed that Reynoldston WwTW may be at risk of not meeting the required flows passed forward of 8.5 l/s. My understanding it that this risk of non-compliance has yet to be confirmed.

**Action: Please confirm whether the storm overflow is included in the Storm Overflow Assessment Framework for AMP 7.**

**Action: Please provide us with a brief explanation of steps you will now take to confirm if the required flows passed forward are being met or not. This explanation should include timelines.**

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.