

Compliance Assessment Report CAR_NRW0043842

Permit being assessed: BH0058001

For: Tregaron SPS (CSO and EO, held by DWR CYMRU CYFYNGEDIG

At: High Street, Tregaron, Ceredigion, SY25 6LA.

Type of assessment carried out: Report/Data Review, Reason: Incident Response (Incident number: 2309545).

On 11/12/2023.

Parts of permit assessed: 2.1.1; 2.3.2(a)

NRW Lead Officer: Bethan Lewis.

Report sent to: CARS mailbox, CARS mailbox, on 19/04/2024.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
WQ-B1 - Water Quality - Operations - Permitted activities	Assessed (A)	
WQ-C1 - Water Quality - 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-C1	Confirm what actions will be taken to (1) prevent further discharges of discoloured effluent entering the Afon Breninig; and (2) to prevent sewage fungus from building up at the outfall.	17/06/2024

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 11 December 2023 (incident reference number: WIRS 2309545) and 08 January 2024 (incident reference number: WIRS 2400438), Natural Resources Wales (NRW) received reports of discolouration and sewage fungus at the outfall of Tregaron Sewage

Pumping Station (SPS) (permit number: BH0058001). Please see below a summary of both incidents:

WIRS 2309545

On 11 December 2023, NRW received a report describing white discolouration, sewage fungus and a strong odour at the outfall of Tregaron SPS. Dŵr Cymru Welsh Water (DCWW) were notified of the report and confirmed that the site was passing forward flows of 16l/s or more, therefore meeting the conditions required for a storm discharge under permit BH0058001. A DCWW Operator was sent to site and confirmed that the discharge from Tregaron SPS was brown/green in colour, causing discolouration within the Afon Brennig for approximately 15 metres downstream as shown in photograph 1 courtesy of DCWW below. DCWW suspect that the discolouration had been caused by the discharge of discoloured effluent into the sewer network by a third party holding a DCWW trade permit. DCWW have since commented that the third party have been compliant with the terms of this permit.



Photograph 1: Discolouration within the Afon Brennig downstream of Tregaron SPS on 12 December 2023. Photograph courtesy of DCWW.

Despite the discolouration described above, samples collected by DCWW on the 12 and 13 December 2023 as shown in Table 1 below did not indicate that the discharge was causing ammonia concentrations to increase significantly downstream.

Table 1: Ammonia concentrations in samples collected by DCWW on 12 and 13 December 2023

	Ammonia (mg/l)	
	12 December 2023	13 December 2023
Discharge from Tregaron SPS	1.35	8.09

Afon Breninig 5 metres upstream of SPS outfall	0.4	0.13
Afon Breninig 5-10 metres downstream of SPS outfall	0.4	0.14

On 14 December 2023, NRW Officers viewed the outfall at Tregaron SPS. The SPS was spilling at the time of the NRW Officers' attendance, with the discharge resulting in a grey discolouration immediately around the outfall. The discolouration diluted quickly once flows entered the main Afon Breninig as shown in photograph 2 below. Sewage fungus was also noted in the vicinity of the outfall as shown in photograph 3 below.



Photograph 2: Discharge into Afon Breninig from Tregaron SPS on 14 December 2023



Photograph 3: Sewage fungus near Tregaron SPS outfall on 14 December 2023

WIRS 2400438

On 08 January 2024, NRW received a report describing a brown coloured plume hugging

the left-hand bank of the Afon Breninig for 30-40 metres downstream of Tregaron SPS. Notification was immediately sent to DCWW who stated that they were sending a crew to site to investigate. DCWW later confirmed that the SPS was found to be working as designed, passing forward flows of 15.9l/s. With the storm pumps in operation, a plume had been visible in the Afon Breninig for 10-15 metres downstream as shown in photograph 4 supplied by DCWW below. As with the incident reported on the 11 December 2023, DCWW suspect that this discolouration had been caused by the discharge of discoloured effluent into the sewer network by the same third party holding a DCWW trade permit.



*Photograph 4: Grey plume in Afon Breninig at Tregaron SPS outfall on 08 January 2024.
Photograph courtesy of DCWW.*

DCWW collected samples of the discharge and from the Afon Breninig 10 metres upstream and downstream of the SPS outfall. These were found to contain 1.5mg/l, 0.15mg/l and 0.18mg/l ammonia respectively. According to DCWW, an ammonia concentration of 1.5mg/l within the discharge indicates a high level of dilution compared to crude sewage which typically has an ammonia concentration of >15mg/l. On 10 January 2024, DCWW therefore conducted a lift and look survey on the network to identify areas susceptible to infiltration. The survey indicated that infiltration was a network wide issue.

In an attempt to reduce spills from Tregaron SPS, DCWW tankered flows from the SPS and network between the 09 and 11 January 2024. This tankering had little impact on the volume of effluent discharged into the Afon Breninig, therefore tankering stopped on the 11 January 2024 despite the continuation of spills until the 17 January 2024 when Tregaron SPS eventually recovered from excess flows.

On 18 January 2024, NRW Officers revisited the outfall at Tregaron SPS. Only a trickle of effluent was seen discharging from the SPS at the time of the NRW Officers' attendance. As

shown in photograph 5 below, the riverbed appeared light grey in colour surrounding the outfall in contrast to the darker, coarser riverbed observed elsewhere. Sewage fungus may also have been present near the outfall.



Photograph 5: Afon Brennig near Tregaron SPS outfall on 18 January 2024

Conclusion

As the SPS was pumping forward flows of ~16l/s or more before discharging to storm at the time of the two reported incidents above, the incidents are not currently believed to represent a breach of permit. NRW do however ask DCWW to confirm what actions will be taken to (1) prevent further discharges of discoloured effluent entering the Afon Brennig; and (2) to prevent sewage fungus from building up at the outfall. NRW ask that DCWW do this by no later than the **17 June 2024**. NRW wish to remind DCWW that although an asset may be compliant with its permit, pollution is considered separately to permit compliance and further action may be taken accordingly.

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.