

## Compliance Assessment Report CAR\_NRW0043627

**Permit being assessed:** BA2001101

For: Crynant Sewage Treatment Works, held by DWR CYMRU CYFYNGEDIG

At: Track Off Neath Road (A4109), Crynant, Neath, SA10 8SG.

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

On 12/10/2023, between 09:00 and 17:00.

Parts of permit assessed: 2.3.2 (d) & 1.1.1 (a)

**NRW Lead Officer:** Rhys Griffiths, accompanied by: Chris Palmer, Owen Caughlin, Rhys Griffiths.

**Report sent to:** Mark Mason , Operational Supervisor , on 23/04/2024.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
WQ-A1 - Water Quality - Management - General management	C3 Minor	2.3.2 (d)
WQ-A1 - Water Quality - Management - General management	C3 Minor	1.1.1 (a)
WQ-A1 - Water Quality - Management - General management	C3 Minor	1.1.1 (a)

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	Improve screen maintenance and frequency and inform us of your schedule.	19/04/2024
WQ-A1	Removal of vegetation growth in Humus Tank. removal of vegetation growth in RBC receiving channel	19/04/2024
WQ-A1	Carry out a service on the Reedbeds	21/06/2024

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.

**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

On the 12th October 2023, NRW Environment Officers visited Crynant Sewage Treatment Works to carry out a site inspection. Officers were met by the DCWW Catchment Performance Manager along with a member of the Operations Team who guided NRW Officers during the inspection.

At the time of inspection the site appeared to be operating with a number of non compliances with permit BA2001101.

**Non compliance:** Rag carryover observed beyond RBC's. Also fragments of torn plastic media present.

**Condition: 2.3.2 (d)**

**Action:** Improve screen maintenance and frequency.

**Action:** Please inform us of your schedule.

**Non compliance:** Significant growth in and failure of reedbeds. Clear signs of succession and naturalisation meaning maintenance has not been done for a long time). Flows now bypassing by flowing over the top (rather than through), little to no treatment provided at this time. This is a tertiary treatment process which was integral to revised treatment process and works upgrade in AMP4 and it is clearly not being maintained in the way it was designed.

**Condition: 1.1.1 (a)**

**Action:** Severe maintenance required.

**Action:** When was maintenance last carried out on the reedbeds and details of work conducted.

**Action:** How frequent are these checks and when were they last checked?

**Non compliance:** General Management and Housekeeping at site was shown to be poor.

**Condition: 1.1.1 (a)**

**Observation:** Housekeeping of old motor parts from lower filter system.

**Action:** Removal of vegetation (grass) growth in Humus Tank.

**Action:** Removal of vegetation (weeds/grass) growth in RBC receiving channel.

**Recommendation:** Both sample points to be correctly identified & properly labelled.

### **Observations and Actions**

1. Storm tanks on site were full and discharging via the storm outfall to the River Dulais at the time of visit. Only 2 of the 4 storm tanks were in use with sewage fungus observed in the 2 tanks that were out use. This may be related to carry over from the in use storm tanks however investigations need to be carried out by DCWW.

**Action - Carry out investigations such as dye tracing to establish any cross-**

**connections as to why the 2 out of use storm tanks have sewage and rain/nuisance water present.**

2. Discussions were had around flow splitting between the primary settlement tank and RBC's. **Action - Please can DCWW confirm how flows are directed around site with a schematic flow split as DCWW staff were unable to confirm details at the time of inspection.**

3. DCWW recently introduced a Submerged Aerated Filter (SAF) below the RBC's which was in "priming" stage ahead of commissioning. The SAF will take a portion of the flows post RBC's and further filter them before re introducing them to the RBC's.

**Request - Please provide an update on the success of SAF and have DCWW seen any changes in the effluent quality from it's introduction.**

4. Cello alarm possibly not picking up and notifying DCWW when a spill occurs.

**Action – Provide reassurance that cello alarm will alarm and notify DCWW when a spill has occurred.**

**Suggestion – Review position of level monitors in RBC receiving channel. Due to the lack of freeboard in the channel, it could be still overtopping and spilling to the adjacent roadway further up the channel. Are the level alarms best placed to give an accurate account of the level due to the current setup/levels?**

#### **Additional Info/Recommendations for improvements**

Recommendation - Confirm if screen motor spares are available on site? If not, we suggest for resilience.

Recommendation - The addition of a gate to enable proper inspection of the storm discharge and safely assess its impact on the Afon Dulais.

Recommendation - The reengineering of the receiving channel from the RBCs, to improve freeboard and help prevent further non-compliant discharge in higher flows ref: CAR\_NRW0041868.

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.