

Compliance Assessment Report CAR_NRW0043732

Permit being assessed: WB3797TG

For: STP AT CELTIC MANOR RESORT, held by The Celtic Manor Resort

At: HUNTER LODGES, CELTIC MANOR, COLDRA WOODS, NEWPORT, NP18 1HQ.

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

On 01/03/2024, between 10:00 and 11:30.

Parts of permit assessed: Site Operations

NRW Lead Officer: Gavin Dodd.

Report sent to: Simon White, Facilities Manager , on 29/04/2024.

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	1.) Condition 1.1.1 (a) General Management – The operator shall manage and operate the activities in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances and those drawn to the attention of the operator as a result of complaints.
WQ-C1 - Water Quality - Emissions and monitoring - Emissions to water	C3 Minor	2.) Condition 3.1.2 Emissions to Water- The limits given in schedule 3 shall not be exceeded

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	Provide the written management system	31/05/2024

Criteria	Action needed	Complete by
WQ-C1	Improve operations and ensure emissions limits specified in the permit are not exceeded	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

I (Environment Officer Gavin Dodd) arrived at Celtic Manor Resort, Newport on Friday 1st March 2024 at 10:00 to conduct an inspection regarding a discharge of secondary treated sewage effluent to an un-named tributary of the River Usk (Permit Number WB3797TG). Site facilities manager Simon White was also in attendance.

The treatment system was a Klargester 2000 NU Bio Disc and consisted of a number of chambers. Sewage effluent enters the primary chamber, which is then filtered when passing through the additional chambers. After filtration, the liquid effluent passes through a lined reed bed before discharging to the tributary. The weather conditions at the time of the inspection were sunny, though it had been raining heavily prior to the visit.

The treatment plant (Figure 1) was accessed through a field adjacent to the Hunters Lodges. The location of the plant matched the area highlighted under Schedule 7- Site plan in the permit. When we arrived at the location, it was not possible initially to inspect the chambers of the system as sewer keys were required. Mr White arranged for site facilities to bring the required keys to the location. In the interim, the effluent sample point was inspected.



Figure 1 External view of treatment system under cover

The discharge point for the system matched the NGR provided in the permit (ST 36317 91513). As outlined in Schedule 1- Operations, the discharge was to be made via a lined reed bed. The reed bed was accessed through a field beneath the PTP (Figure 2), though it wasn't possible to determine if it was lined or not. The effluent leaves this reed bed through a pipe and into the unnamed tributary of the River Usk (Figure 3 and 4). No effluent discharged from the pipe, there was no sewage fungus present around it and the tributary was free of odour and discolouration. Immediately downstream of the discharge point, this tributary went to ground. There was some staining to the interior of the pipe.



Figure 2 Reed bed for the system



Figure 3 Discharge point into tributary



Figure 4: Discharge pipe showing staining

Mr White mentioned that emissions tests were carried out quarterly and visual checks were conducted daily; evidence of this was provided on site.

After inspecting the discharge point, I returned to the treatment system and inspected the alarm panel. This was situated to the rear of the system. The chambers for the system were approx ten feet below ground level (Figure 5-7). Solid waste was visible in the first chamber; this solid waste was not present in the final chamber. There was also an aeration chamber in the system, though it was difficult to see to the bottom.



Figure 5 Initial chamber of system



Figure 6: Aeration chamber



Figure 7 Final effluent chamber

Laboratory results for the system from October 2023 were within the limits specified in the permit, except for ammoniacal nitrogen which was 7.5 mg/l (limit of 5 mg/l).

Breaches

1.) Condition 1.1.1 (a) General Management – The operator shall manage and operate the activities in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances and those drawn to the attention of the operator as a result of complaints.

Justification: The written management system for the system was not available on site.

2.) Condition 3.1.2 Emissions to Water- The limits given in schedule 3 shall not be exceeded.

Justification: The most recent lab results for the final effluent exceeded the limits in the permit for the parameter of ammoniacal nitrogen expressed as N (result of 7.95 mg/l compared to 5 mg/l limit in the permit).

Actions Required by Dates Specified

Action 1: Provide the written management system

Action 2: Improve operations and ensure emissions limits specified in the permit are not exceeded.

The deadline for the above actions is 31st May 2024

Contact details:

If you have any queries regarding this CAR form or to provide an update on any actions above, please contact me using the following details: Gavin Dodd, Environment Officer,

gavin.dodd@naturalresourceswales.gov.uk, 03000 65 3193.

If we do not receive the information requested within specified deadline and have not been informed as to why there is a delay then we may serve a Regulation 60 Notice requiring the information under Environmental Permitting (England and Wales) Regulations 2016.

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.