

## Compliance Assessment Report CAR\_NRW0043694

**Permit being assessed:** AN0401901

For: RYDER CUP CLUBHOUSE CELTIC MANOR, held by THE CELTIC MANOR RESORT LIMITED

At: RYDER CUP CLUBHOUSE, CELTIC MANOR RESORT, COLDRA WOODS, NEWPORT, NP18 2YA.

**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	Condition: 1.10.1 (c)- The sewage treatment plant shall be operated and maintained in accordance with good operational practice such that tanks shall be desludged at sufficient frequency and in such a manner to prevent excessive carryover of suspended solids
WQ-D1 - Water Quality - Information - Records	C3 Minor	Condition: 1.11 (a) Recording and Reporting- The Consent Holder shall establish and operate a documented maintenance programme and record all non-routine actions undertaken that may have adversely affected effluent quality. Copies of the programme shall be made available for inspection by the

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
		Agency's officers at all reasonable times

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 waste transfer notes	31/05/2024
WQ-D1	Provide maintenance programme	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 1<sup>st</sup> March 2024 at 10:00 to conduct an inspection regarding a discharge of secondary treated sewage effluent and trade effluent to an un-named tributary of the River Usk (Permit Number AN0401901). 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 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 on the site beneath the Ryder Cup clubhouse. The location of the plant matched the NGR provided by the permit (ST3565591328) and then inspection of the chambers was carried out (Figure 2-4). There was no odour to the initial or final chambers of the system. Solid waste was observed in the middle chambers of the system but was absent from the final chamber; Mr White mentioned that the system had been emptied recently and had waste transfer notes available for this. No flow measurement device was in place for the system though the alarm panel was operational.



Figure 1: External view of treatment system



Figure 2 First chamber of system with scum



*Figure 3 Second chamber showing aeration unit*



*Figure 4 Final chamber of the system*

The effluent from the system entered a pipe and then discharged into the tributary after being filtered through a reed bed; there was no access to this reed bed. The effluent was also not discharging on my attendance. The consent point for the permit was accessed via stairs leading to the tributary. I did not observe any ragging or sewage fungus at this location, nor was there any odour. There was some staining to the interior of the discharge pipe, but the watercourse was flowing clearly (Figure 5 & 6). Mr White confirmed that the system would serve a maximum of 300 people, if there were two functions at the clubhouse but this number was a rarity.



*Figure 5 Discharge point for the system (shown as consent point in the permit)*



*Figure 6 Tributary directly below consent point*

Condition 1.6- Composition was assessed through sample results provided by Mr White which were taken in November 2023; these were all within the limits specified under this condition.

### **Breaches**

**1.) Condition: 1.10.1 (c) Maintenance** - The sewage treatment plant shall be operated and maintained in accordance with good operational practice such that tanks shall be desludged at sufficient frequency and in such a manner to prevent excessive carryover of suspended solids.

**Justification:** The system had been recently desludged but the notes for this weren't available at the time of the visit.

**2.) Condition: 1.11 (a) Recording and Reporting-** The Consent Holder shall establish and operate a documented maintenance programme and record all non-routine actions undertaken that may have adversely affected effluent quality. Copies of the programme shall be made available for inspection by the Agency's officers at all reasonable times.

**Justification:** The maintenance programme was not available during the visit.

### **Actions Required by Dates Specified**

**Action 1-** Provide waste transfer notes for the recent desludging of the system.

**Action 2-** Provide the documented maintenance programme for the system.

**The deadline for the above actions is 31<sup>st</sup> 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](mailto: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](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.