

Compliance Assessment Report CAR_NRW0043086

Permit being assessed: AN0353601

For: HAFOD GARAGE WASTE TRANSFER STATIN, held by THOMAS WASTE MANAGEMENT

At: WASTE TRANSFER STATION, HAFOD GARAGE, OLD EBRGAVENNY ROAD, BRYNMAWR, NP23 4BU.

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

On 06/02/2024, between 10:00 and 11:00.

Parts of permit assessed: Site Operations

NRW Lead Officer: Gavin Dodd, accompanied by: Chris Burge, Alastair Krzyzosiak.

Report sent to: Gareth Thomas , Site 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-B3 - Water Quality - Operations - Operating techniques	C3 Minor	Condition 1.6.1 (c)- Maintenance: The site shall be operated and maintained in accordance with good operational practice such that it 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 1.7 (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-B3	Provide the waste transfer notes for the interceptor.	31/05/2024
WQ-D1	Provide the maintenance programme for the interceptor	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 the Thomas Waste site on Tuesday 6th February at 10:00 to conduct an inspection regarding a discharge of trade effluent from the waste transfer station at Hafod Garage to Cwm Nantmalyn (Permit Number AN0353601). Environment Officer Alistair Krzyzosiak, Enforcement Officer Chris Burge and site manager Gareth Thomas were also in attendance. There was a light, persistent rain throughout the site visit.

As per the permit, the discharge was to be comprised of trade effluent consisting of site drainage. This site drainage was channelled through manholes and into a three stage interceptor on site before discharging to Cwm Nantmalyn.



Figure 1: Manhole chamber in yard feeding into interceptor



Figure 2: External view of interceptor system

On attendance, there was standing water around the interceptor chambers and in the yard. This water was entering the manhole chambers in the yard and no run off from the site was observed. Each chamber of the interceptor was inspected.



Figure 3: First interceptor chamber



Figure 4: Second interceptor chamber



Figure 5: Final interceptor chamber

The water in the final chamber of the system appeared to still have some scum on the surface. I requested the maintenance programme and waste transfer notes for the interceptor system, as is required under Condition 1.6- Maintenance and 1.7- Recording and Reporting. Mr Thomas did not have these documents readily available but said he

would send them across when possible.

The composition of the discharge could not be determined on site as the discharge point to Cwm Nantmalyn was only accessible through a culverted section beneath the site.



Figure 6 Nearest downstream access to discharge point

The discharge point could only be accessed through the culverted section visible in the above photo. Due to H&S concerns, the composition of the discharge was assessed from the banking nearby. The watercourse was clear of suspended solids and did not contain any significant trace of visible oil or grease. After the watercourse was checked at this culvert, we left the site at 11:00.

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Breaches

1.) Condition 1.6.1 (c)- Maintenance: The site shall be operated and maintained in accordance with good operational practice such that it shall be desludged at sufficient frequency and in such a manner to prevent excessive carryover of suspended solids.

Justification: Waste transfer notes for the interceptor were not readily available on site.

2.) Condition 1.7 (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 for the interceptor was not readily available on site.

Actions required by Date Specified

Action 1- Provide the waste transfer notes for the interceptor.

Action 2- Provide the maintenance programme for the interceptor.

The deadline for the above actions is the 31st May 2024

Advisories

Provide the latest waste transfer notes for the cesspit on site.

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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.