

Compliance Assessment Report CAR_NRW0044523

Permit being assessed: AC0094701

For: Crickhowell Wastewater Treatment Works, held by DWR CYMRU CYFYNGEDIG
At: Track off from A40, Crickhowell, Powys, NP8 1DF.

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

On 30/04/2024, between 10:00 and 11:05.

Parts of permit assessed: See Criteria Below

NRW Lead Officer: Robert Harding, accompanied by: Chris Gurney.

Report sent to: CARS Mailbox, CARS Mailbox, on 11/06/2024.

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	Assessed (A)	
WQ-B1 - Water Quality - Operations - Permitted activities	Assessed (A)	
WQ-B2 - Water Quality - Operations - The site	Assessed (A)	
WQ-C1 - Water Quality - Emissions and monitoring - Emissions to water	C3 Minor	2.3.2- For the discharge(s) specified in table S3.3: (a) Off-line storm storage must be fully utilised before a discharge occurs. It shall only fill when the flow passed forward is equal to or greater than the overflow setting indicated due to rainfall and/or snow melt and shall be emptied and its contents returned to the continuation flow as soon as reasonably practicable. The minimum off-line storm storage required is specified in table S3.3

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	Remove sludge build up from storm tank, to return full offline storage capacity. Provide confirmation of removal, and provide date of previous sludge removal	31/08/2024

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

This was a pre-planned OSM site inspection conducted by Natural Resources Wales Officers Robert Harding and Chris Gurney. We were shown around the site by the following DCWW representatives.

GM- Catchment Manager

TB- Supervisor

The weather during the visit was overcast with intermittent showers. We were shown through the works from inlet through to the outfall.

General Observations

The STW is a filter bed works with a permitted storm discharge. The works received a new consolidated permit which came into effect on 07/02/2024, bringing together the STW and Storm discharges. The site is an unmanned site which is attended by operatives on a set schedule. Telemetry equipment is in place to monitor the works when unmanned.

Inlet and Storm

The incoming flows into the works are through combined and foul sewers. There is a storm discharge at the site which was previous permitted separately (AC0094702), but now is contained within the new consolidated permit.

The flows into the works arrive within a self-contained inlet unit at the head of the works. The flows pass through a mechanical screen to remove excess solids and rag. At the time of inspection, the mechanical screen was clearly operational and appeared to be effectively removing solids rag from passing forward. There is an additional bypass channel at the inlet with a 6mm bar screen, which is intended to use when undertaking maintenance on the mechanical screen. There is a macerator in operation following the mechanical screen and bypass channel. The UWWTR influent sample point is located at the inlet, this was clearly labelled and accessible.

During the inspection of the inlet, the flows into the head of the works increased to a level where the main channel through the mechanical screen became inundated. As a result, flows started passing through the bypass channel. It is not clear if this was due to blockages within the screen or capacity limitations. The bypass screen was clogged with rag/debris and flows started flowing over the top of the screen. The macerator is located after the bypass channel; however, some flows were clearly passing around the macerator and onto the next stage of treatment without any form of screening or maceration. This is not deemed a noncompliance in this instance; however, it is a cause for concern as it reduces the efficiency of the treatment process. It may suggest the inlet system is inadequately sized to process the incoming flows into the works.

After screening at the inlet, the flows pass the storm weir, which is a hard-set weir height within the channel. Flows can

only overflow into the storm channel once levels reach a certain height. At the time of inspection, the works was not running to storm, as the level was below the storm weir height. There is an EDM level sensor in operation at the storm weir, which is in place to record when the works is running to storm (based on inlet level). There is no additional screening on the storm channel, as all flows should pass through the screening and macerator at the inlet to the works.

There are two connected rectangular storm tanks in operation on site, which have a combined outfall channel. Each storm tank has retention boards on the outfall ends, similar in appearance to a settlement tank. The outfall channel is located at the top of the tank, meaning a discharge can only be made once the storm storage is fully utilised. At the time of inspection there was no discharge being made from the storm tanks. There is an EDM level sensor in operation on the outfall channel from the storm tanks (to environment). The storm tanks on site are manually returned to the head of the works.

*****Noncompliance*****

The left-hand site storm tank appeared to be over 50% full of sludge, which greatly reduces the offline storm storage for the site (approximately 25% of the total offline storage). The sludge appeared to have been sitting in the tank for some time and has not been returned to the head of the works or removed by tanker. Should the site start running to storm, a discharge will be made via the storm outfall channel before it should be. As the full offline storage capacity cannot be utilised. This is there for a breach of permit condition 2.3.2, which stated the following.

2. *For the discharge(s) specified in table S3.3:*

- a. *Off-line storm storage must be fully utilised before a discharge occurs. It shall only fill when the flow passed forward is equal to or greater than the overflow setting indicated due to rainfall and/or snow melt and shall be emptied and its contents returned to the continuation flow as soon as reasonably practicable. The minimum off-line storm storage required is specified in table S3.3.*

This has been assigned a category 3 noncompliance as there is a potential for a minor impact on the receiving environment, because of the reduction in offline storm storage capacity. It is possible that any recent storm discharges from the site (to environment) may be considered noncompliant discharges, this will be addressed with a follow up data investigation.

Following the Storm weir, the incoming flows pass through an MCERTS flow meter before passing forwards to primary settlement. The MCERTS display screen was accessible and appeared in good working order.

Primary Settlement

The primary settlement tanks on site are two radial tanks, with retention boards and rotating half bridges containing a sludge scraper and brush. The primary settlement systems appeared in good working order and there were no signs of significant solids carrying over into the outfall channels. Monitoring equipment is in operation. Following primary settlement flows enter a filter bed distribution centre.

Filter Beds

The works contains three filter beds containing stone media. The rotation arms for each were moving freely and unhindered. The effluent distribution points appeared clear of any debris and effluent was being effectively spread onto the filter media. There were no signs of pooling or dry tracks within the filter media and no vegetation growth on the surface of the filters. Overall, the filter beds appeared in good working order.

Humus Tank

The works has two circular settlement tanks with rotating half-bridges. There were no signs of solids passing over from the settlement tanks. The rotating brushes were clearly operational and keeping the outfall channels clear of any debris or excessive vegetation build up. The effluent within the outfall channels was flowing clear at the time of inspection and there were no signs of sewage fungus present.

Outfall and Sampling point

The final effluent sample point is clearly marked with appropriate signage including the sample point number. The UWWTR effluent sample point and equipment were clearly labelled and accessible.

The effluent within the sample chamber appeared to be flowing clear of any solids or signs of polluting matter.

The outfall into the river Usk was checked. The outfall is situated in a location slightly back into the bank and is not directly into the main flow of the river. This did not appear to be hindering the effluent reaching the main watercourse, and there were no signs to suggest effluent had been sitting within the channel before entering the river. The watercourse at the time of inspection was running clear of any signs of discolouration or sewage fungus, both around the outfall and downstream of the outfall location.

General Comments

The works will be receiving updated emissions limits (including Phosphorus) from 07/02/2025. The treatment works appears to be producing effluent which is compliant to the emissions limits set out within the permit.

Actions required- By 31/08/2024.

1. Investigate the root cause for flows passing around the inlet screen into the bypass channel during normal operation. Provide details of the investigation and prevention measures by 31/08/2024
2. De-Sludge the Storm tanks on site as soon as possible. Provide confirmation that this has been completed, as well as the date of the last removal prior to this inspection (30/04/2024)

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.