

## Compliance Assessment Report CAR\_NRW0044906

**Permit being assessed:** WP3126XA

For: STP @ PEN-Y-PASS YOUTH HOSTEL, held by YHA (ENGLAND AND WALES)

At: SNOWDONIA NATIONAL PARK, NANT GWYFANT, CAERNARFON, GWYNED, LL55 4NY.

**Type of assessment carried out:** Check Monitoring/Sampling, Reason: Routine.

On 30/07/2024.

Parts of permit assessed: 3.1.2

**NRW Lead Officer:** Gareth Siney, accompanied by: Euryrn Roberts.

**Report sent to:** Danial Roberts, Regional Building Surveyor, on 16/08/2024.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
WQ-C1 - Water Quality - Emissions and monitoring - Emissions to water	C2 Significant	3.1.2 The limits given in schedule 3 shall not be exceeded
WQ-C1 - Water Quality - Emissions and monitoring - Emissions to water	C2 Significant	3.1.2 The limits given in schedule 3 shall not be exceeded
WQ-C1 - Water Quality - Emissions and monitoring - Emissions to water	C2 Significant	3.1.2 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-C1	Investigate the effectiveness of the treatment plant in dealing with ammonia and seriously improve operations on site. Please explain what actions will be taken to prevent a fourth breach.	16/09/2024
WQ-C1	Investigate the effectiveness of the treatment plant in dealing with BOD. Seriously improve the plant operations and maintenance programme. Please explain what actions will be taken to prevent further breaches.	16/09/2024
WQ-C1	Investigate the effectiveness of the treatment plant in dealing with suspended solids. Seriously improve the plant operations and maintenance programme. Please explain what actions will be taken to prevent further breaches.	16/09/2024

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

This CAR form is being sent following the receipt of a permit breach notification after Natural Resources Wales took a compliance sample on the 30th of July. The sample had an ammonia result of 148 mg/l, which is **over seven times** the permitted limit of 20mg/l.

This ammonia limit of 20mg/l has been included in the permit in order to protect water quality and fish life downstream. The result of 148 mg/l of ammonia is truly unacceptable. It is comparable to crude sewage. These sort of ammonia results during low flow summer conditions could result in a fish kill in the watercourse downstream of the discharge.

As well as this, the sample had a BOD (Biological Oxygen Demand) of 230 mg/l which is **over eleven times** the permitted limit of 20 mg/l. BOD indicated the amount of organic matter present in water. A value of 230 mg/l suggests minimal treatment is occurring before discharge.

Suspended solids was also measured in the sample taken. The permitted value is 30 mg/l and the sample taken on 30/07/2024 returned a value of 88 mg/l, **almost triple** what is permitted.

The question therefore arises as to the effectiveness of the treatment plant at this site. I would strongly urge you to get this aspect investigated. It would be wise to look at the level of pollution on the incoming influent and at different stages in the treatment plant.

It is noted in the response to your previous ammonia failure (March 2024), that the contractor Alpha Services found issues with your treatment plant and stated that throughput numbers needed to be assessed. It is possible that the plant size is grossly insufficient for the number of users.

The results of this sample arrive after a site visit was undertaken on Tuesday 6th August. The treatment plant had been emptied below the discharge point so sample could not be taken. It was noted there were often challenges emptying the plant routinely due to parking issues on site. While the permit is for the treatment of waste from the Youth Hostel, it was said that effluent from the cafe and warden centre across the road also fills into the treatment plant. A serious review of the **maximum** number of daily users vs the capacity of the treatment plant is required. The evidence from these three samples suggests the plant is wholly insufficient for the task and raises questions about the performance of other YHA

facilities that are currently unmonitored.

As this breach joins a trend of continual permit failures, NRW are considering the suitable action to take, should this non-compliance continue, e.g an Enforcement Notice

Actions: See above comments regarding the permit breaches and, as discussed on site, get a third party in immediately to assess the performance of the treatment plant at various points in the system.

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.