

Compliance Assessment Report CAR_NRW0045036

Permit being assessed: AF4020401

For: CASTLETON FARM CARAVAN PARK, held by MATTHEW FORREST

At: CASTLETON ROAD, ST. ATHAN, BARRY, SOUTH GLAMORGAN, CF62 4LD.

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

On 20/08/2024, between 10:30 and 11:30.

Parts of permit assessed: Conditions 3 & 4

NRW Lead Officer: Charlotte Rhodes, accompanied by: Harry Warburton.

Report sent to: William Forrest, Site Manager (on behalf of permit holder), on 05/09/2024.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
WQ-D1 - Water Quality - Information - Records	Assessed (A)	
WQ-C1 - Water Quality - Emissions and monitoring - Emissions to water	C2 Significant	3.1
WQ-C1 - Water Quality - Emissions and monitoring - Emissions to water	Action only (X)	
WQ-C1 - Water Quality - Emissions and monitoring - Emissions to water	Action only (X)	
WQ-C4 - Water Quality - Emissions and monitoring - Installation of monitoring boreholes	Assessed (A)	

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	Investigations as to why the BOD is failing its permitted limit must be completed within one month, with plans to implement a fix as follows in the further actions.	04/10/2024
WQ-C1	Once the cause of failing BOD has been identified, a plan to fix must be agreed and completed within 3 months.	04/12/2024
WQ-C1	Provide evidence to show investigations, work and improved effluent quality within 4 months.	06/01/2025

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.

We are currently considering taking enforcement action against you for the non-compliance recorded above. We will contact you in due course.

4. Details of our assessment

Visit report/Comments

On 20th August 2024, Officers C RHODES and H WARBURTON met with B FORREST, Site Manager and relative of Permit Holder, for a routine inspection of the sewage treatment system servicing Castleton Park Caravan Park (a residential park), permit number: **AF4020401**. Weather at the time of inspection was dry and sunny, with rain having preceded earlier that morning.

The Flowpath treatment plant was installed and is maintained by We Built It Ltd, serviced one yearly and the tanks emptied and refreshed every 4 months on a rolling contract with Redwood Environmental Services Ltd. All records were present and checked by Officers during the inspection; no significant issues raised in terms of operation with any noted issues addressed as necessary.

Treatment plant

Treatment consists of three underground tanks, the first holding sludge, second containing filter media and aeration pumps and third acting as a final settlement tank, before discharging to a small brook offsite which is an unnamed tributary of Rills Well. Flows are also recirculated periodically and the whole system is alarmed in the event of failure. The treatment plant appeared well maintained overall with sturdy steps leading down to the tanks and the lid of the final tank was lifted for visual inspection: no visible oil or grease, solids or sludge and no notable odour were observed, suggesting the plant is currently in good working order.



Steps down to the treatment plant from site*Final tank bird's eye view***Discharge point**

Prior to this inspection, conversations have been taking place for some time over email and during a previous informal visit in November 2022 regarding the discharge point of this package plant, as it was highlighted during regulatory monitoring that it was inaccessible due to dense overgrowth - **in breach of condition 3.2.1**. It is also, however, located on land not owned by the permit holder which resulted in some difficulties arranging rectification. This remained unresolved until a recent overcoming of communication difficulties and maintenance work was arranged in advance of this inspection, resulting in much improved access and a new pipe having been installed from the treatment plant to the discharge point. The site has thus been brought back **into compliance** with the below condition, as seen in photos below (marked as monitoring boreholes in the scores table):

Condition 3.2.1 - *Permanent means of access shall be provided to enable sampling/monitoring to be carried out in relation to the emission points specified in schedule 3 tables S3.1, S3.2 and S3.3 unless otherwise agreed in writing by Natural Resources Wales*



(Left) Newly installed access gate to discharge. (Right) Newly installed pipeline to discharge point.

Officers were escorted through a newly installed access gate, downhill following the new pipe, to the discharge point to watercourse by one of the site managers. This was noted as ST 02244 68283; flow appeared to be discharging freely into the unnamed tributary (in bursts rather than a constant steady flow) and did not appear to be resulting in any visible impact to the watercourse upon entry and immediately downstream. No odour was noted either.

A sample was taken from the pipe directly and sealed in situ, photographed below. The site manager was offered a bipartite sample but did not feel it necessary and so one was not taken. Back at the site office, a Code B Notice of Powers and Rights and Sample Receipt were issued and no other issues were noted, though it was discussed that the Schedule 7 Site Plan within the permit does not reflect the actual location of the treatment plant and it is, in fact, much closer to the caravan park itself.



(Left) Discharge location looking downstream. (Right) Sample in situ, sealed.

Results of analysis

Sample results were returned as follows:

Parameter	Permit limit	Sample result	Interpretation
BOD (biological oxygen demand)	40 mg/l	55.7 mg/l	FAILURE
Visible oil or grease	None	None	PASS
COD (chemical oxygen demand)	-	404 mg/l	Higher than recommended
Ammonia (N)	-	36.8 mg/l	Extremely high

Suspended solids	-	210 mg/l	Extremely high
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It is noted that only BOD has a permitted limit and not suspended solids or Ammonia, which is very unusual for a permit of this nature, hence their inclusion within the testing parameters regardless. As in the table above, their results are **significantly above** the limits that *would be* permitted and therefore should be considered within the remedial action to be taken.

Additionally, as seen in the table above the BOD permitted limit was exceeded and thus constitutes a **non-compliance with permit for the below condition**:

Condition 3.1.2 - The limits given in Schedule 3 shall not be exceeded.

Actions

Although visually the site seemed to be in working order, the sample results show that the current treatment method is clearly ineffective at present and is likely to be having a significant impact on the receiving (very small) watercourse, Rills Well.

As such, this constitutes a non-compliance with permit condition 3.1.2 and **we are issuing a Written Warning** at this time, with the potential to escalate enforcement as required. The following actions are required:

1. Investigations into why BOD is failing its permitted limit of 40 mg/l must be completed within one month by 04/10/2024, with plans to implement a fix as follows in the further actions.
2. Once the cause of failing BOD has been identified, a plan to fix must be agreed and completed within 3 months, by 04/12/2024
3. Provide evidence to show investigations, work and improved effluent quality within 4 months, by 06/01/2025.

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.