

## Compliance Assessment Report CAR\_NRW0043854

**Permit being assessed:** BP0266601

For: Storm and Emergency Overflow at Manorbier Transfer SPS, held by DWR CYMRU CYFYNGEDIG

At: Lane opposite Beach Car Park, Manorbier, Pembrokeshire, SA70 7SU.

**Type of assessment carried out:** Audit, Reason: Routine.

On 08/02/2024, between 11:40 and 12:40.

Parts of permit assessed: Monitoring and Reporting Conditions

**NRW Lead Officer:** Caryl Brace, accompanied by: Simon Shorten.

**Report sent to:** CARS@dwrwymru.com, CARS mailbox, on 16/09/2024.

### 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 | Assessed (A)      |                  |

Result types are explained in more detail in the 'Important Information' section below.

### 2. What action is required?

No action required.

### 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

The site was audited on 8 February 2024

At the time of the inspection the asset was in good working order

#### Comments and actions summary

Site has no standby generator

- Assets team currently looking at a power upgrade
- Known issue with pass forward flow not being met, current flow of 19.79 litres per

second observed

- No odour issues evident
- Two pumps operational, on duty stand by
- Storm tank screens de-silted every six months with tank washed down regularly
- Spill data for 2023 requested at time of audit. **Please share this data with NRW by 19 April 2024**

18 April 2024

EDM data received from DCWW on 8 April 2024

A query regarding the FPF not being met, please confirm why this is the case and what is the plan to rectify.

Please respond by 10 May 2024

**Email received from DCWW 11 September 2024**

**DCWW have carried out an assessment of FPF underperformance at Manorbier and concluded the root cause as pump performance. We have identified that the duty pump is performing at a lower rate than expected and the capacity of the pumps isn't sufficient. In addition to this we are investigating the condition of the rising main to determine if this is a factor.**

**To address these issues and increase FPF performance, DCWW have installed a new duty pump and can confirm we are now achieving between 19-20l/s. We are going to continue to monitor performance of the new pump as well as assess feasibility to change the setup of the pumps Duty / assist. The current power supply to site isn't sufficient enough to power 2 pumps and we have been working closely with national grid to resolve this. In order to upgrade the power supply, a large scale improvement works would be required which is not feasible, therefore as an alternative we will potentially be installing variable speed drives (VSD). The VSD will allow the pumps to ramp up slowly dependent on flow and avoid drawing too much power at once. As a contingency if the upgrades were to be completed, we will keep pump spares stored onsite to improve efficiency when failures occur.**

**In addition to the works mentioned, we are carrying out investigations into the condition of the rising main and any potential follow on work that may be needed. In response to the FPF issues identified in the Tenby catchment, a working group has been set up with relevant internal stakeholders to continually progress with improvements.**

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.