

Compliance Assessment Report CAR_NRW0042703

Permit being assessed: BP0251803

For: Settled storm overflow at Saundersfoot Pumping Station (Sea Outfall), held by DWR CYMRU CYFYNGEDIG

At: Moreton Lane, Saundersfoot, Pembrokeshire, SA69 9EB.

Type of assessment carried out: Report/Data Review, Reason: Other.

On 26/10/2023.

Parts of permit assessed: Monitoring and Reporting Conditions

NRW Lead Officer: Rod Thomas.

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	C3 Minor	Table S3.3 requires 48 litres per second to be passed forward before spilling.

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	Email from DCWW 3/10/2023 "Identified as risk during April 2023. Root cause confirmed at site visit in April 23. To be released to Capital Delivery for pumping station upgrade works in Sept 23."	30/11/2023

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

In email 3/10/2023 from DCWW, it stated that the root cause had been identified during site visit. Please confirm what this root cause was.

Email also stated that improvements would be carried out by September 2023. Please confirm if this work has been completed and what the improvements were.

S3.3 requires a storm tank capacity of 1800 cubic metres and a passed forward flow of 48 litres per second.

Please let us know how much is now being passed forward assuming the improvement works have been carried out and how much was being passed forward before the improvement works were made.

Email received from DCC (23 Feb 2024) with update on works progression. DCC also requesting 31 March 2024 as completion date for improvement works. This was granted.

18 April 2024

Can you confirm if the works have been completed. Please respond by 10 May 2024

Email received from DCWW on 29 April 2024

Apologies the response to this is delayed but as in line with what was discussed in the liaison meeting last week. Further to the email sent on 23rd February 24 providing an update on progress with Saundersfoot SPS.

Please see details below in response to action detailed on **CAR_NRW0042703**, let me know if you have any further queries. I've noted this CAR as closed in the shared CAR's database and will wait for your response to confirm closure unless there's a further request for information.

Action: Email from DCWW 3/10/2023 "Identified as risk during April 2023. Root cause confirmed at site visit in April 23. To be released to Capital Delivery for pumping station upgrade works in Sept 23."

We can confirm the upgrades to the PLC were completed last week and the pump configuration is now operating as Duty/Assist/Standby. We are hopeful that these upgrades will improve flows at Saundersfoot SPS and we will be closely monitoring the assets performance to assess whether it is meeting FPF of 48l/s. In addition to this we are still in the process of identifying whether the proposed additional works on the rising main are the next steps to improving the flow performance at Saundersfoot. As discussed in the liaison meeting we are currently planning the survey work that will determine those next steps. Once we have agreed next steps we will provide you with an update.

Please supply an update regarding the proposed next steps for flow performance by 1 August 2024 and confirm whether or not a FPF of 48l/s is being achieved at site.

Email received from DCWW 11 September 2024

Action 1: Please supply an update regarding the proposed next steps for flow performance by 1 August 2024 and confirm whether or not a FPF of 48l/s is being achieved at site.

The proposed next steps for improving flow performance at the site are currently focused on addressing the air valve issues. This asset has been prioritized as the top of DCWW's list for air valve inspection and replacement. We have an ongoing programme specifically targeting air valves that require replacement, and the work on this asset is expected to be completed between late 2024 and early 2025. Following the upgrades to the air valves, there is potential for further action, such as arranging a desilt, to enhance performance.

At present, the FPF of 48 l/s has not been achieved, and compliance with this target remains outstanding. However, it is important to note that improvements have been observed since the recent upgrades to the PLC and pump configuration. These upgrades have resulted in flow rates averaging 37 l/s and up to 40l/s, indicating positive progress towards the desired FPF.

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.