

Compliance Assessment Report CAR_NRW0045362

Permit being assessed: AS1003201

For: Monmouth Wastewater Treatment Works, held by DWR CYMRU CYFYNGEDIG

At: Off Redbrook Road (A466), Wyesham, Monmouth, NP25 4LG.

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

On 07/10/2024, between 09:30 and 10:15.

Parts of permit assessed: Whole permit

NRW Lead Officer: Peter Jones, accompanied by: Alastair Krzyzosiak.

Report sent to: cars@dwrwymru.com, DCWW, on 16/10/2024.

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	2.3.2 (b)
WQ-A1 - Water Quality - Management - General management	C3 Minor	1.1.1.(a)
WQ-A1 - Water Quality - Management - General management	C3 Minor	1.1.1 (a)
WQ-A1 - Water Quality - Management - General management	C3 Minor	1.1.1 (a)
WQ-A1 - Water Quality - Management - General management	C3 Minor	1.1.1 (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	Action should now be taken to stop the discharge from the surface water drain into the storm tanks.	02/12/2024
WQ-A1	Remove vegetation	01/11/2024
WQ-A1	Resolve issue of ponding and remove vegetation.	01/11/2024
WQ-A1	Remove vegetation.	01/11/2024
WQ-A1	Remove material from storm tank inlet channels.	01/11/2024

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.

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

Routine site inspection of Monmouth Wastewater Treatment Works carried out by Environment Officer Peter Jones and Alastair Krzyzosiak.

Weather Dry and overcast, there had been heavy rainfall in the last 24 hrs.

The site was issued with a new permit on the 6 November 2023, the new permit consolidates environmental permits AS1003201 and AN0353501.

Observations

Untreated sewage effluent enters the works, the flow then splits and passes through automated 6 mm screens to remove solids. Currently, one of the screens is not operational.

Please advise when the screen will be back online and outline the contingency procedures to remove solids should a technical fault occur with the remaining screen.

Material removed by the six-millimetre screens is then conveyed to a skip, the waste material is removed from site for incineration.

The UWWTR crude influent sample point is clearly marked.

Having passed through the 6 mm screen the flow passes into the works, the flow metre recorded the inlet flow varying between 82 and 84 l/s. When above 83.9 l/s, effluent flowed over the weir into the storm channel. A second pipe was discharging to the storm channel. The site operators explained this was surface water from outside the treatment facility discharging into the storm effluent channel. Please see attached photographs.

The storm channel and storm tanks should only be used for the transfer and storage of storm water and there should be no other discharges to this portion of the works.

- With additional clean surface water entering the storm tanks the minimum offline storm storage of 848 m³ is not being met.
- When the storm effluent is being recirculated, this additional flow entering the works is not being recorded by the mag flow metres and there is potential for the DWF flow data submitted to be inaccurate due to the unknown quantity of surface water entering the works via the pipe.

This is a breach of your permit conditions, 2.3.2 (b) The discharge of clean surface water to the storm tanks will compromise the minimum offline storage requirement of 848 m³.

Immediate action should now be taken to stop the discharge from this pipe into the treatment works.

Onward flow into the works is then recorded by the FFT sensor, it ensures the sensor is recording the flow accurately the gap between the sensor and surface of the flow should be free of obstructions. Currently vegetation is growing from the side of the channel and extending beneath the sensor. This may be affecting the sensors' ability to record the flow

accurately, this is a breach of your permit conditions.

This is a breach of permit condition. 1.1.1 (a)

The flow then enters four rectangular Dortmund Primary Settlement Tanks (PSTs), settled sludge is drawn off for further treatment. The tanks were operating effectively and there was no little visible carry over of solids into the onward flow channels. From the PSTs the flow was pumped to the Submerged Aeration Filter Unit (SAF), which are located close to the works inlet.

From the SAF unit, the flow enters the filter beds, there are currently 5 operational filter beds on the site. Filter beds 1 and 4 have significant ponding on their surface and excessive moss and grass growth. The poor maintenance of the filter beds is a breach of the permit conditions. Steps should now be taken to resolve the ponding issue and moss and grass growth should be removed. This is a breach of permit condition 1.1.1 (a)

The outlet channels from the filter beds look neglected, there is excessive plant growth in the channels which may hamper the onward flow of effluent. This is a breach of your permit conditions and steps should now be taken to actively clean and maintain the channels.

This is a breach of permit condition 1.1.1 (a)

From the filter beds the flow passes to the humus tanks, these were operating as per the permit conditions and no issues were noted. The Final Settlement and UWWTR sampling point were clearly labelled.

A Mecana unit is currently being installed to provide tertiary treatment. When operational, flow from the humus tanks will be passed to the Mecana unit and from there the final effluent will be discharged to the river Wye via the final effluent discharge point.

The storm tanks contained effluent at the time of the inspection. As noted at the start of the inspection inlet flows were at times above the weir setting, and a small volume of effluent was going to storm along with clean surface water from the surface water drain which discharged to the storm channel. Whilst inspecting the storm tanks the return valve opened and effluent was being pumped back to the head of the works. The inlet channels contained detritus and vegetation; this was also noted on the inspection on the 17/02/2022. This is a breach of permit condition 1.1.1(a)

The on-site diary was checked, and this was found to be up to date. Labels on all Mcert metres showed they had all been calibrated in 2023.

Condition 1.1.1 (a) requires the operator to manage and operate the activities in accordance with a written management system. This was not available at the time of the inspection.

Actions

- *Remove plant growth in effluent channels throughout the treatment plant.*
- *Remove vegetation below sensors.*
- *Resolve ponding issues on filter beds and remove plant growth on filter medium.*

- *Stop the discharge of clean surface water into the storm channel.*
- *Advise when the second automated 6 mm screen will be back online and outline the contingency procedures to remove solids should a technical fault occur with the remaining screen.*
- *Condition 1.1.1 (a) requires the operator to manage and operate the activities in accordance with a written management system. Please provide me with a copy of the management system.*

Attachments

Photographs of site inspection

If you have any questions regarding the visit or CAR form, please contact me by e-mail or by telephone.

E-mail: Peter.A.Jones@naturalresourceswales.gov.uk

Mobile telephone: 07760443974

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.