

Compliance Assessment Report CAR_NRW0045544

Permit being assessed: CG0123301

For: GORSE HILL CARAVAN PARK TREFRIW ROA, held by GORSE HILL CARAVANS LTD

At: GORSE HILL CARAVAN PARK TREFRIW, TREFRIW ROAD CONWY, CONWY, CONWY, CONWY.

Type of assessment carried out: Site Inspection, Reason: Incident Response (Incident number: 2413279).

On 18/10/2024, between 12:00 and 14:00.

Parts of permit assessed: All

NRW Lead Officer: Nathan Owen, accompanied by: Laura Jones.

Report sent to: Rob Thomas , Owner, on 31/10/2024.

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	Action only (X)	

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	Maintain sewage plant to ensure full treatment is carried out through the year, Keep both banks of the treatment plant operating throughout the year. Ensure regular maintenance and emptying is carried out.	31/12/2024

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.

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

On the 18th of October 2024 NRW Officers Nathan Owen and Laura Jones attended the Gorse Hill Caravan park, (CG0123301).

We were met by the Head groundsman who escorted Officers to the Package treatment plant area.

The groundsman explained the process to NRW and on request began opening the hatches to the below ground plant.

Image 1, below ground treatment system with a Left and Right bank. Banks A and B.



Image 2 Inlet screen



The inlet screen was intact, however there was significant build-up of rags/debris in this chamber suggesting it had not been emptied in quite some time. Flow was passing forward from here relatively un hindered.

Image 3, Primary settlement chamber with distribution channels



The primary/distribution chamber had significant build-up of materials again suggesting the plant had not been emptied in some time. Flow from here at the point of inspection was only going to the right hand treatment bank (bank A) of the treatment plant.

Image 4, Aeration and Media chamber.



The first of 2 of the media and aeration chambers was working nominally with treatment taking place.

Image 5, Secondary Aeration and media chamber.



Secondary aeration media chamber, this chamber was not operating nominally diffuser was clearly in a state of disrepair and requires urgent attention.

Image 6, final settlement chamber



The final settlement chamber had a significant amount of matter in suggesting treatment further back had been compromised.

Image 7. Outlet chamber



The outlet chamber was free from any growth of sewage fungus.

NRW officers decided on site that due to the partial failing of the secondary aeration chamber and the amount of matter within the tanks it would be beneficial to carry out a sample of the end product to determine if treatment was being achieved and Permit Condition 4 was being met.

Samples were taken at 1400 on the 18th of October by NRW officers and sent to the NRW lab in Swansea.

Lab results

Biochemical Oxygen Demand - BOD **12.800mg/l**. Permit limit 20mg/l.

Suspended solids **5mg/l**. Permit limit 30mg/l.

There is no condition for Ammonia at this site however as part of the suite of testing an Ammonia test was carried out and the results for Ammonia are **20.90mg/l**, the accepted limit for Ammonia post treatment is **20Mg/l** however below 10mg/l should be the target for any enterprise. To ensure that high levels of Ammonia do not leave Gorse Hill caravan park, NRW recommends that the following actions are carried out immediately and are on going to ensure full treatment is carried out. This will prevent any impact to the environment from high levels of Ammonia.

- Ensure the package treatment plant is serviced and emptied on a regular basis
- Repair the faulty diffuser in the secondary aeration and media chamber.

Please can the actions for emptying the plant and repairing the diffuser be carried out no later than 31st December 2024. There is an ongoing requirements for emptying and maintaining the plant throughout its operational life span.

NRW thank Gorse Hill and its Groundsman for their time on the day.

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.