

Compliance Assessment Report CAR_NRW0045589

Permit being assessed: AW1003201

For: LLANFILO STW, held by DWR CYMRU CYFYNGEDIG

At: LLANFILO STW, UNKNOWN, UNKNOWN, UNKNOWN, UNKNOWN.

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

On 27/08/2024, between 10:00 and 10:30.

Parts of permit assessed: See Criteria Below

NRW Lead Officer: Robert Harding.

Report sent to: CARS Mailbox, CARS Mailbox , on 07/11/2024.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
WQ-A1 - Water Quality - Management - General management	Assessed (A)	
WQ-B1 - Water Quality - Operations - Permitted activities	Assessed (A)	
WQ-B2 - Water Quality - Operations - The site	C3 Minor	4- The outlet to the watercourse shall be constructed, maintained and appropriately labelled so that a representative sample of the discharge may be obtained and National Grid Reference SO 1172 3390 as shown marked "Discharge Point" on Plan AW10032
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?

Criteria	Action needed	Complete by
WQ-B2	Provide a plan of works, detailing the plans for the installing a suitable sample point at Llanfilo WWTW	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

This was a pre-planned site visit requested and organised by DCWW representatives. The purpose of the visit was to discuss challenges faced for installing sampling points at several sites, which are being required as part of an ongoing permit review programme. The visit was attended by Natural Resources Wales Officer Robert Harding. I was shown around the site by several DCWW representatives. This visit was not a pre-planned OSM inspection, however DCWW operatives confirmed that they were happy for the visit to also be used to assess permit compliance (if required).

General Observations

The STW is a small gravity powered single filter bed works, which is in a remote location and serving a small population. The works currently operates under a descriptive permit, with a daily flow limit of 13m³/day.

Primary Settlement and Ferric Dosing

The flows into the works flow directly into a rectangular covered primary settlement tank, which contains retention boards for holding back solids from the outfall. The effluent from the Primary tanks flows directly into the centre column of the filter bed. At the time of the visit, there were minimal flows passing through to the filter bed.

Filter Bed

The site has a single filter bed containing stone media. There is a syphon in place within the centre column of the filter bed. This is to allow water levels to build up to a suitable level before flows are sent through to the filter arms, to ensure ample hydrological pressure for the filter bed arms to function correctly. At the time of the visit, the filter bed arms were not initially rotating as the syphon had not discharged. Once the syphon discharged the arms rotated freely. There were a couple of blocked distribution holes, which were cleared by operatives whilst on site. Overall the filter bed appeared to be effectively distributing the influent over the filter media. There were no signs of ponding or excessive vegetation growth. The filter beds did contain a coverage of leaf litter, as the site has several trees surrounding it, this did not appear to be preventing distribution to the filter media. The flows from the filter bed then pass to final settlement.

Humus Tank

The final settlement tank on the site is a small circular tank with a retention board to slow flows down and prevent solids passing over into the outfall channel. The tank is situated below ground level and has signage advising that it is a confined space. Overall, the final settlement system appeared to be operating effectively and there were no signs of significant solids passing through to the outfall. The outfall channel tank was very shallow and had a slight coverage of what appeared to be silt on the channel bed. There are several trees alongside the site compound so this may be caused by leaf litter/ other organic matter.

Outfall and Sampling point.

The flows from the humus tank flow directly to the outfall, and there is no final effluent inspection chamber or sampling points currently installed at the site.

Currently it is not possible to collect a representative sample from this works. Whilst on site a location has been identified where a sampling point will be installed. The only potential place to collect a sample currently, would be the outfall channel of the humus tank. However, the flows are very low at this point, meaning collecting a full sample would

not likely be possible. This would also require disturbing the bed of the chamber disturbing any sediment present. This would result in the sample not accurately representing the effluent from the works.

The outfall into the watercourse was not inspected on this occasion as it was unclear at the time where the outfall was. I believe the outfall is some distance away from the site which is accessed through the adjacent fields.

*****Noncompliance*****

There currently is no sampling point available at the works to take a suitable and representative sample. This is therefore a noncompliance of condition 4 of permit AW1003201, which states the following.

“4- The outlet to the watercourse shall be constructed, maintained and appropriately labelled so that a representative sample of the discharge may be obtained and National Grid Reference SO 1172 3390 as shown marked “Discharge Point” on Plan AW10032.”

This has been assigned a category 3 noncompliance as being unable to attain representative sample could lead to effluent quality problems being missed. This could lead to a low level impact on the receiving environment.

Installation of a new Sampling Point

This visit was organised to discuss the challenges faced in meeting the incoming sample point requirement for this works. DCWW are looking to install a new sampling point at the works, which will be situated within the site compound. A new sample point will be required when the site received a new updated permit, as part of NRW review of permits programme.

It was discussed on site that the main challenge faced for this site, is that deep excavations will be required to install a suitable sampling chamber. The new chamber will need to be installed deeper than the level of the Humus tank, so will likely need to be in excess of 3m deep to allow sufficient depth for a representative sample to be collected. Additionally, access for heavy machinery may be limited due to the secluded nature of the site. The site compound is small and surrounded by trees. It is likely that access will need to be made via neighbouring land owned by the adjacent horse stables. DCWW have advised that they will also require a power supply to be installed at the works as part of the site upgrades to ensure effluent can achieve the required standards following the permit review.

Actions required- by 31/12/2024.

1. Provide a plan of works, detailing the plans for the installing a suitable sample point at Llanfillo WWTW. This should include specifics of what is to be installed at the works to achieve a representative sample point, relevant site plans, estimated completion dates and details of any ongoing challenges faced in installing the new sampling point.

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.