

Compliance Assessment Report CAR_NRW0045612

Permit being assessed: AF4020401

For: CASTLETON FARM CARAVAN PARK, held by MATTHEW FORREST
At: CASTLETON ROAD, ST. ATHAN, BARRY, SOUTH GLAMORGAN, CF62 4LD.

Type of assessment carried out: Check Monitoring/Sampling, Reason: Routine.

On 29/10/2024, between 10:15 and 11:15.

Parts of permit assessed: Conditions 3 & 4

NRW Lead Officer: Charlotte Rhodes.

Report sent to: William Forrest, Site Manager (on behalf of permit holder), on 13/11/2024.

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)	
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	Revisit and resampling will still take place to ensure compliance is consistent. Actions within the previous CAR remain outstanding.	Already completed

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

Visit comments & context

On 29th October 2024, Officer C RHODES met with D FORREST, Site Manager and relative of Permit Holder,

for a routine inspection of the sewage treatment system servicing Castleton Park Caravan Park (a residential park), permit number: **AF4020401**. Weather at the time of inspection was dry with heavy rain the previous day.

This inspection followed **CAR_NRW0045036** issued in August, which identified a **non-compliance** with Condition 3.1.2 and actions were issued with varying deadlines, the earliest of which was Action 1, copied below, which **was addressed within the deadline**.

1. *Investigations into why BOD is failing its permitted limit of 40 mg/l must be completed within one month by 04/10/2024, with plans to implement a fix as follows in the further actions*

Investigations were undertaken on 17th September 2024 by We Built It Ltd and the report stated that the site did not appear to have any major problems with functionality other than low bacteria levels in the bio zones (second tank). They therefore reseeded with Enbac B500 and advised the operator continue to do so for the next couple of months, after which a revisit will be arranged.

In addition to this, the return pump was adjusted to increased the frequency of recirculation and the operator sent letters around the park to remind residents not to flush bleach and other antibacterial cleaners.

Treatment plant

The secondary tank’s aeration system appeared to be in working order and improved compared to the August visit, but there were still some solids floating. The final tank had a lot of floating solids and Officer RHODES advised on-site that further investigation was required as soon as possible to address this.



51.40564, -3.40741, 73.0m
29/10/2024 11:07:08

Left: Secondary Tank



51.40561, -3.40732, 74.0m
29/10/2024 11:07:58

Right: Final Tank

Officer RHODES made it clear that revisits and resampling was necessary until the results returned to within permitted limits. The operator shared that the PTP is having its annual drain-down and clean out in the first week of November (subsequently confirmed as Monday 11th), so it was agreed that a revisit mid-November would be best to allow time for the system to resettle following this.

Discharge point

Upon reaching the discharge point, the access for which was already beginning to become more difficult as weeds are regrowing, the Rills Well watercourse was running higher than the previous visit, such that the discharge pipe was only millimetres away from being submerged. The discharge itself was a slow trickle in volume and B FORREST had advised that they'd asked the maintenance team to increase the frequency of the return flow in attempt to improve treatment, thus whilst this was recirculating the volume dropped below the outlet level in the final tank.

A sample was taken from the pipe directly and was visually discoloured brown. Halfway through collecting the sample, the volume had increased – assumed due to the return flow clicking off again – which it was initially thought may have influenced the sample discolouration. Officer RHODES tried sampling a second time in the can to see if this was the case but the colour remained the same. A photograph was taken of the sample in situ prior to sealing, as below (mistakenly tangled in some evidence bag during storage beforehand). The site manager was offered a bipartite sample but did not feel it necessary and so one was not taken.



Left: Rills Well running high below outlet.



Right: Sample prior to sealing in situ.

Once returning to the main site, a Code B Notice of Powers and Rights and Sample Receipt were signed by and issued to the site manager. The question was asked about how to arrange their own proactive monitoring/testing and was there a DIY kit available, which was later answered in an email dated 6th November saying that due to the nature of the testing involved there is not a DIY option available but there

are consultancies and agencies out there that would be best placed.

Sample results against permitted limits are as follows:

Parameter	Permit limit	Sample result	Interpretation
BOD (biological oxygen demand)	40 mg/l	32.4 mg/l	PASS
Visible oil or grease	None	None	PASS
COD (chemical oxygen demand)	-	199 mg/l	
Ammonia (N)	-	32.2 mg/l	Extremely high
Suspended solids	-	90 mg/l	High

It is noted that only BOD has a permitted limit and not suspended solids or Ammonia, which is unusual hence their inclusion within the testing parameters regardless. As in the table above, their results are **above** the limits that likely *would be* permitted and therefore should be considered within the remedial action to be taken.

BOD, however, was found to be **within** permitted limits and thus constitutes a return to **compliance with Condition 3.1.2**. The site will still be revisited in November following the maintenance work to ensure this remains consistent and there are no further concerns with the discharge/treatment at present.

Actions / Further comments

No further comments at this time. The following actions remain outstanding from the previous inspection but will not be reiterated in the Actions section of this report:

2. *Once the cause of failing BOD has been identified, a plan to fix must be agreed and completed within 3 months, by 04/12/2024*
3. *Provide evidence to show investigations, work and improved effluent quality within 4 months, by 06/01/2025.*

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.