

Compliance Assessment Report CAR_NRW0044511

Permit being assessed: CM0188601

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

At: Maelor Way, Overton, Wrexham, LL13 0EG.

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

On 06/06/2024.

Parts of permit assessed: All

NRW Lead Officer: Sally Sheehan.

Report sent to: CARS Mailbox, CARS Mailbox, on 02/01/2025.

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	3.1 Emissions to water
WQ-C1 - Water Quality - Emissions and monitoring - Emissions to water	C3 Minor	3.3.11 The flow passed forward monitoring specified in table S3.1: (a) shall be capable of recording the flow passed forward with a total uncertainty within +/- 8% at the overflow setting specified in table S3.3;
WQ-C1 - Water Quality - Emissions and monitoring - Emissions to water	C4 No impact	3.3.7 The Operator shall take appropriate measures to ensure that the event recorder remains fully operational at all times within the reference period specified in table S3.1. Any failures shall be remedied as soon as reasonably practicable.

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	Investigate flow issues preventing FFT being achieved before using storm facilities and overflow and report back to NRW	Already completed

Criteria	Action needed	Complete by
WQ-C1	Ensure MCERTS flow meter is reading within uncertainty of +8/-8	Already completed
WQ-C1	Ensure that all EDM monitors are working and recording quality data and report back to NRW	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.

You are non-compliant with your permit.

At this time, we are issuing you with a warning for the non-compliance recorded above. Warnings may influence future enforcement response for continued or further non-compliance.

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 is a follow up CAR Form to CAR_NRW0042535 issued on 4/11/23 following a site visit on 24/8/23

Action complete: Have Dwr Cymru considered if this site would benefit from a generator? *Dwr Cymru have confirmed that this has been considered but due to the gravity nature of the site and the storm storage capacity available the risk of adverse effects with a short term power outage is low.*

Data Review of for Overton Sewage Treatment Works (STW)

Data provided: Event Duration monitor (EDM spill) from the third storm tank, EDM for the combined storm overflow (CSO), flow passed to treatment (PFF), second storm tank level and hummus return flow for the year 2022.

Following a review of the data I shared my findings with Dwr Cymru and highlighted concerns that the site may not be treating the volume of sewage agreed in the permit before utilising the storm and over flow facilities on site. Dwr Cymru responded to my email and subsequently we had a meeting to discuss the site.

During 2022 there are several occasions where the storm and overflow facilities were utilised when the PFF was around 10% lower than the volume specified in the permit (7.97l/s). Due to the location of the flow meter, Dwr Cymru have explained that the flow data cannot be used in comparison to the spills from the CSO on site. During this period the MCERTS Flow meter has regularly recorded minus readings and the EDM Meter from the storm tank has recorded erroneous data.

Dwr Cymru notified NRW of flow issues in February 2023. They have shared that they are investigating various issues at Overton STW. Specifically around flow to treatment, issues with the EDM Monitors and the quality of the EDM data recorded.

In light of all this:

Please provide an update on the site assessment from the EDM team.
Please provide an update on the flow issues at site.
Please ensure that the MCERTS meter is reading correctly.

I have submitted a request of more recent data to see if the situation has improved.

2/1/25 Actions closed: Dwr Cymru have provided information in response to the actions above. Flow measurement at this site has been assessed and improvements made. Including the installation of an MCERTS flow meter at the inlet, installation of UMON3 and 4 flow meters (flow to storm storage) and relocation of the site return flows.

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.