

Compliance Assessment Report CAR_NRW0046147

Permit being assessed: AC0140301

For: Sennybridge Wastewater Treatment Works, held by DWR CYMRU CYFYNGEDIG
At: Sennybridge Army Camp, Sennybridge, Powys, LD3 8TS.

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

On 13/12/2024, between 10:00 and 11:00.

Parts of permit assessed: See Criteria Below

NRW Lead Officer: Robert Harding.

Report sent to: CARS Mailbox, CARS Mailbox , on 04/02/2025.

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	C3 Minor	1.1.1 The operator shall manage and operate the activities: (a) in accordance with a written management system that identifies and minimises risks of pollution so far as is reasonably practicable, including those risks arising from operations, maintenance, accidents, incidents, non-conformances and those drawn to the attention of the operator as a result of complaints; and (b) using sufficient competent persons and resources
WQ-A1 - Water Quality - Management - General management	C3 Minor	1.1.1 The operator shall manage and operate the activities: (a) in accordance with a written management system that identifies and

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
		minimises risks of pollution so far as is reasonably practicable, including those risks arising from operations, maintenance, accidents, incidents, non-conformances and those drawn to the attention of the operator as a result of complaints; and (b) using sufficient competent persons and resources
WQ-B1 - Water Quality - Operations - Permitted activities	Assessed (A)	
WQ-B2 - Water Quality - Operations - The site	Action only (X)	
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-A1	Clean up the sewage fungus build up within the Primary Settlement outfall channel. Provide confirmation and pictures to show that this has been completed by 28/02/2025.	28/02/2025
WQ-A1	Clean up the sewage fungus build up within the Humus Tank outfall channel. Provide confirmation and pictures to show that this has been completed by 28/02/2025.	28/02/2025
WQ-B2	Cut back the vegetation which is blocking access to the outfall into the watercourse. To create a safe access route to the watercourse for environmental impact monitoring. Provide any plans for this work to be completed by 28/02/2025	28/02/2025

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

This was a pre-planned OSM site inspection carried out by Natural Resources Wales Officer Robert Harding. I was shown around the site by the following DCWW representatives.

MH- Operational Supervisor

RS – Process Science Technician

The weather during the visit was overcast with intermittent showers. I was shown through the works from inlet through to the outfall.

General information

The STW is a filter bed works bed works which receives flows from gravity sewer and a nearby pumping station. The works has a storm discharge in place and operates under a consolidated permit.

Inlet and Storm Weir

The incoming flow to the site is pumped up to the inlet point, where telemetry is in place to monitor flows. At the inlet there is a mechanical brush screen in operation to remove larger solids/rag, which was clearly operational at the time of inspection. Following the brush screen there is a macerator to break down any remaining solids. A bypass channel with a set bar screen is in place which can be used when maintenance is undertaken on the mechanical screen and macerator. There were no signs of any significant solids passing through to primary treatment and all inlet screening appeared to be in good working order.

The storm weir on site is located after screening. It is a hard-set weir setting with EDM monitoring equipment in place to monitor spills. There is no storm storage on site, so any flows which pass over the storm weir are discharged to the receiving watercourse. There is an EDM sensor in operation within the storm channel, which was easy to access and clearly operational. At the time of inspection, the works was running to storm, as flows were entering the storm channel. Whilst on site the FPF reading from the MCERT meter was 8 l/s (Meter is located after the primary tanks), whereas the overflow setting set out within the storm consent is 12 l/s. Following the inspection DCWW have provided information to confirm that the weir setting in place is set a 12l/s. The MCERTS on site combine to provide a summated flow.

Primary Settlement

The works has two parallel rectangular primary settlement tanks in operation, with retention boards on the outlet end to retain solids within the main chamber. Incoming flows lows are spilt between the two tanks. There are pipes spraying water onto the surface of each of the tanks, to promote settlement of solids.

The outfall channel from the tanks appeared to be flowing with clear effluent, however there was an extensive coverage of sewage fungus present within the outfall channels for the primary settling tanks. Sewage fungus growth is an indication of high nutrient loading within the effluent and may indicate problems with treatment process. The level of build up is a cause for concern, as it indicates that appropriate maintenance and cleaning has not been taking place, which increases a risk of pollution being caused. This is therefore a breach of permit condition 1.1.1 (a) which states.

***** Noncompliance *****

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1. 1.1- *The operator shall manage and operate the activities:*
 - a. *in accordance with a written management system that identifies and minimises risks of pollution so far as is reasonably practicable, including those risks arising from operations, maintenance, accidents, incidents, non-conformances and those drawn to the attention of the operator as a result of complaints; and*
 - b. *using sufficient competent persons and resources.*

This has been classified as a category 3 noncompliance, as this could potentially have a minor impact on the receiving watercourse.

***Action required- Clean up the Primary Settlement Tank Outfall channels, to remove sewage fungus build up.



The two MCERTS meters monitoring FPF are located between the primary tanks and the filter beds.

Filter Beds

The works has two filter beds containing stone filter media. The filter bed arms serve a dual purpose on this site. Firstly, half of the filter arms operate conventionally with distribution nozzles at the bottom of the arms, these are for distributing regular treatment works flows. There then are a second set of filter arms on each filter which contain holes located at the top of the filter bed arms. These distribution points come into use when the works is running to storm over the storm weir. The result is storm discharges at the site still pass through the filter beds. At the time of inspections, the storm filter bed discharges were in operation, as the works was running to storm.

The rotation arms were moving in a free and unhindered manner, and no blockages were observed.

The filter beds appeared in good working order and there were no signs of ponding, or excessive vegetation growth. There was some grass present on the filter beds, but this was not excessive or preventing effecting distribution to the filter media.

Humus Tanks

The works has two parallel rectangular settlement tanks with retention boards to retain solids. There was a thick build-up of foam present on the surface of the inlet channel to the settlement tanks, which potentially indicates high nutrient

loading or turbidity. This was being held back by the first set of retention boards and was not passing through to the outfall. Overall, the humus tanks appeared to be operating effectively. There were no signs of solids passing into the outfall channel and the effluent was running clear. There was a visible build up of sewage fungus on the bed of the outfall channel and on the base of the outfall pipe of the humus tanks. As with the primary tanks this build up is a cause of concern as it indicates high nutrient content and a lack of appropriate monitoring/ maintenance. This is therefore a breach of permit condition 1.1.1(a).

***** Noncompliance *****

1.1.1-The operator shall manage and operate the activities:

- a. in accordance with a written management system that identifies and minimises risks of pollution so far as is reasonably practicable, including those risks arising from operations, maintenance, accidents, incidents, non-conformances and those drawn to the attention of the operator as a result of complaints; and*
- b. using sufficient competent persons and resources.*

This has been classified as a category 3 noncompliance, as this could potentially have a minor impact on the receiving watercourse.



Outfall and Sampling point.

The Final effluent sampling point is clearly marked with appropriate signage including the sample point number. The sampling point appeared appropriate for an indicative sample to be taken. At the time of inspection, the outfall was flowing freely and there were no signs of significant solids passing through or sewage fungus within the outfall chamber.

It was not possible to physically inspect the outfall into the receiving watercourse, as there was thick vegetation growth in the field which made the outfall inaccessible. It would be beneficial for the vegetation to be cut back, to restore safe/easy access to the outfall into the watercourse, to allow for appropriate monitoring of the impact on the watercourse. This is not a noncompliance against permitted conditions; however, it results in it not being possible to monitor the watercourse for any signs of impact.



General Comments

In terms of works operation, the treatment process appears to be production effluent in line with permitted limits and had not had any recent sampling exceedances. The works appears to require increased monitoring and cleaning, to prevent the excessive sewage fungus build up which was present at the time of inspection.

Actions required by 28/02/2025.

1. Clean up the sewage fungus build up within the Primary Settlement and Humus Tank outfall channels. Provide confirmation and pictures to show that this has been completed by 28/02/2025.
2. Advisory Action- Cut back the vegetation which is blocking access to the outfall into the watercourse. To create a safe access route to the watercourse for environmental impact monitoring. Provide any plans for this work to be completed by 28/02/2025.

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.