

Compliance Assessment Report CAR_NRW0046090

Permit being assessed: BP0275401

For: Cardigan WwTW (STW) Cardigan Settled Storm, held by DWR CYMRU CYFYNGEDIG
At: End of Netpool Rd, Cardigan, Dyfed, SA43 1PA.

Type of assessment carried out: Report/Data Review, Reason: Incident Response
(Incident number: 2414012).

On 31/10/2024.

Parts of permit assessed: 2.3.1(a)

NRW Lead Officer: Bethan Lewis.

Report sent to: CARS mailbox, CARS mailbox, on 31/01/2025.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
WQ-B3 - Water Quality - Operations - Operating techniques	C3 Minor	2.3.1(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-B3	Confirm what actions may be taken to prevent a recurrence of this incident.	14/03/2025

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.

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

On 31 October 2024, Natural Resources Wales (NRW) received a self-reporting WATPOL (SAP ref: 317099842; WIRS ref: 2414012) from Dŵr Cymru Welsh Water (DCWW) stating that a level transducer had failed on Membrane Bioreactor (MBR) ditch 2 at Cardigan

Wastewater Treatment Works (WwTW) causing aeration effluent to spill into storm tank 3. Storm tank 3 subsequently spilled via the decant arm into the final effluent, before discharging to the Afon Teifi.

According to the site's telemetry, MBR 2 started spilling into storm tank 3 at 01:07 hours on the 31 October 2024. Storm tank 3 subsequently started spilling at 03:10 hours.

A DCWW Operative attended site at 04:18 hours and confirmed the issue. It was decided that all sewage entering the works would have to be diverted to storm tanks 1 and 2 to allow the MBRs to reset. Sewage was diverted to storm tanks 1 and 2 between 04:56 hours and 06:59 hours, which was the point at which MBR 1 was eventually brought back online. It was not until 12:12 hours that MBR 2 was brought online after a new transducer had been fitted.

In total, the above incident resulted in:

- storm tank 3 spilling into the final effluent for 2 hours and 2 minutes, between 03:10 hours and 05:12 hours;
- and storm tanks 1 and 2 spilling for approximately 1 hour and 16 minutes, between 06:14 hours and 06:44 hours, and 07:13 hours and 07:59 hours, although the normal morning spike in wastewater flows may have contributed to this second spill. Storm tanks 1 and 2 continued to spill for short periods of time throughout the 31 October 2024, however these discharges may not necessarily have been caused by the incident described above. It is important to note that due to the known issues with flows to full treatment at the site (as highlighted in previous Compliance Assessment Reports (CARs) such as CAR_NRW0044090), sewage entering storm tanks 1 and 2 is partially treated by Dissolved Air Flotation (DAF) units.

DCWW collected samples from the Afon Teifi between 10:34 hours and 10:44 hours on the 31 October 2024. These were collected near Cardigan WwTW's outfall, and upstream and downstream of the outfall. The on-site and laboratory results for these samples are shown in the table below, with on-site results shown in red and laboratory results in blue. Whilst the discharges related to the above incident may have ceased at the time of sampling, the results are reassuring in that they show only a very small increase in ammonia (on-site) and suspended solids downstream of the outfall.

DCWW sample results from 31 October 2024

	Upstream 10:34 hours SN 17045 46154	Outfall 10:39 hours SN 16997 46138	Downstream 10:44 hours SN 16949 46165
Ammonia	0.16 mg/L	0.13 mg/L	0.20 mg/L
Suspended Solids	15 mg/L	14 mg/L	23 mg/L
pH	7.2	6.7	7.4
COD	<50 mg/L	<50 mg/L	<50 mg/L
Ammonia	<0.4 mg/L	<0.4 mg/L	<0.4 mg/L
Nitrate	1.29 mg/L	1.27 mg/L	1.24 mg/L
Nitrite	<0.04 mg/L	<0.04mg/L	<0.04mg/L

Condition 2.3.1(a) of Cardigan WwTW's settled storm discharge permit (BP0275401) states

that *"the discharge shall only occur when and only for as long as either: (i) the flow passed forward is equal to or greater than the overflow setting indicated due to rainfall and/or snow melt or (ii) the hydraulic capacity of the sewer network downstream of the combined sewer overflow is reached due to rainfall and/or snow melt and the level of storm sewage in the sewer at the combined sewer overflow is greater than the weir level of the overflow structure which is specified as an overflow setting in table S3.3"*. As the discharges from storm tanks 1, 2 and 3 at Cardigan WwTW during the morning of the 31 October 2024 did not occur due to rainfall and/or snowmelt, but due to an issue with the level transducer in MBR 2, the discharges represent a breach of permit. Due to the relatively short duration of the discharges and the minimal environmental impact observed, the breach has been recorded above as a category 3 non-compliance, defined as a non-compliance which has the potential to have a minor or minimal impact or effect on the environment, people and/or property. In response to this breach, DCWW are asked to confirm what actions may be taken to prevent a recurrence of this incident by no later than the **14 March 2025**.

In this document 'Natural Resources Wales' means the Natural Resources Body for Wales established by Article 3 of the Natural Resources Body for Wales (Establishment) order 2012.

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.