

Compliance Assessment Report CAR_NRW0045852

Permit being assessed: BA2001101

For: Crynant Sewage Treatment Works, held by DWR CYMRU CYFYNGEDIG

At: Track Off Neath Road (A4109), Crynant, Neath, SA10 8SG.

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

On 17/12/2024, between 11:00 and 12:30.

Parts of permit assessed: All

NRW Lead Officer: Rhys Griffiths, accompanied by: Edward Davies, Rhys Griffiths.

Report sent to: CARS Mailbox, CARS@dwrwymru.com, on 11/02/2025.

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 (a) |
| WQ-A1 - Water Quality - Management - General management | C3 Minor | 1.1.1 (a) |
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| WQ-A1 - Water Quality - Management - General management | C3 Minor | 1.1.1 (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-A1 | Clean and removal of sewage fungus from channel | 01/04/2025 |
| WQ-A1 | Pump replacement in storm tank. See actions in CAR form | 01/04/2025 |
| WQ-A1 | Housekeeping | 01/04/2025 |
| WQ-A1 | Remediate broken structure in redundant storm tank | 01/04/2025 |

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.

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

On the 17th December 2024, NRW Environment Officers visited Crynant Sewage Treatment Works to carry out a water discharge activity permit compliance inspection. Officers were met by the DCWW Catchment Performance Manager, site supervisor along with a member of the Operations Team who guided NRW Officers during the inspection.

At the time of inspection the site appeared to be operating with a number of non compliances with permit BA2001101.

Non Compliance: Sewage fungus growth (large strands) present in the channel at the inlet to the works. It is important to maintain and ensure that the channel is kept clean, by periodic cleansing as part as the site maintenance routine. This is to safeguard against spill level sensors for the storm overflow becoming compromised or potential flow restrictions at that location.

Condition: 1.1.1 (a)

Action: Periodically clean and remove build up of sewage fungus together with other debris or solids that may collect at the inlet channel.

Non compliance: Pump in one of the storm tanks has been removed, resulting in a thick build up of solids/sludge on the base of the tank. This would indicate that the pump has been missing for some time as the solids haven't been agitated and mixed as they would ordinarily be.

Condition: 1.1.1 (a)

Action: Please provide the date that the pump was removed. This doesn't seem to have been notified to NRW.

Action: Please provide a date for the reinstallation of the pump.

Action: Once the pump has been returned and is working, de-sludge and clean the storm tank.

Action: Please provide confirmation of the pump reinstallation along with the de-sludge and cleansing of the storm tank.

Non compliance: General Management and Housekeeping at site was shown to be poor.

Condition: 1.1.1 (a)

Observation: Housekeeping: plastic media has littered every stage of the treatment process from the primary settlement tank onwards. This has been caused by a failure with one of the H SAF units leading to the escape of the plastic media.

Action: Please confirm the date of the failure and when the plastic media was first released.

Action: Clean up and remove the plastic media where present throughout the works. Such a contaminant does not belong in the water environment.

Observations and Actions

1. The trunk sewer which had a hole in it causing stream water to enter the sewer immediately outside the works has been repaired over the summer months. This has purportedly reduced the number of storm spills at the works.

Action - Please provide data to evidence this statement. Together with details of other works which may have been undertaken within the sewerage catchment to intercept or remove water ingress from the network.

2. A broken section of concrete wall in the corner of the redundant primary/storm tanks, adjacent of the bell-mouth weir is allowing water to overflow to land. This matter has been raised during the previous site inspection but hasn't been repaired.

Action - Reinstate the broken section of wall and ensure that it is watertight. Please confirm once this action has been completed.

3. Increased flows are being put through the primary tanks due to treatment process constraints at the works.

Action - Is this a temporary measure and if so for how long will it continue for?

Action - Will additional maintenance be undertaken to the primary tank over this period?

4. Temporary pipework and pump arrangement has been installed to split flows prior to the RBC's, effluent is being lifted from the RBC inlet chamber via pumps into 4 HASAF units located to the rear of the existing RBC's on newly cleared unmade ground. Flows from the primary tank are sent through the HASAF units and are returned under gravity and passed through the bank of RBC's. NRW was not notified of the installation of the HASAF Units.

Action - Please confirm when the HASAF Units were installed and is the current arrangement an interim measure pending a more robust and traditional engineering installation?

5. At the time of inspection only one of the six RBC's were functioning, the remaining five were in a state of disrepair - having failed for various reasons over the last few years. Effluent is still being directed through them, as a process scientist has confirmed that they do provide a percentage removal in terms of effluent loading. From previous correspondence we understand that the works can function sufficiently on 3 RBC's.

Action - What are DCWW's intentions with regard to the repair of the RBC's or alternative treatment methods?

6. Dried sewage sludge could be seen on the ground around the SAF plant which is located at the end of the RBC's. Site personnel confirmed that there had been a leak previously, however NRW were not notified of this and a thorough clean up needs to be undertaken.

7. Site has been subject of theft recently with pumps intended for the HASAF Units being stolen prior to installation. Security cameras have subsequently been installed at the site entrance.

8. At the lower end of the site adjacent to the final effluent sample point a new concrete slab has been installed in readiness for the installation of a Mechana tertiary filter, as part of AMP work being brought forward.

DUE DATE: 01/04/2025

Points for consideration / Recommendations for improvements

There seems to be an increase of reliance on electrically powered treatment systems on site. This subsequently poses a risk should there be an electrical/mechanical failure or loss of power supply. What would this mean to the final effluent quality and what risk does this pose to the receiving watercourse?

Are there plans to increase the existing power supply to the site? If so, when is this work

scheduled to be completed?

Linked to the above, does the existing standby power generator for the site have sufficient capacity? If not, what are DCWW's intentions in this regard?

In view of all the recent treatment process changes at the site, has a review been undertaken of the telemetry and alarm provisions and have any revisions or additions been implemented or planned. If so, please provide details.

Recommendation - The addition of a gate to enable proper inspection of the storm discharge and safely assess its impact on the Afon Dulais. **WTW: hobble.ports.revoluting**

Recommendation - We note that subsequent to the previous site inspection that the freeboard capacity in the outflowing channel from the RBC's has been increased and that there are less fragments of plastic media present in the channel. However sewage fungus growth was noticed. We recommend that the channel is cleaned periodically to prevent excessive fungus growth or other debris that could accumulate and contribute to a blockage or potentially a solids failure.

DCWW's intention is to instal straw bales across the end of both reedbed systems, to capture solids. NRW suggested that there are more appropriate filtration products available - list of potential products to be provided via email to the Operational Supervisor.

As outlined throughout the CAR form there have been a number of changes or developments to the treatment processes at the works. NRW would have expected to have been informed via OPNOT notifications from DCWW.

END

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.