

Compliance Assessment Report CAR_NRW0045941

Permit being assessed: AG0011801

For: Bonvilston West Wastewater Treatment Works, held by DWR CYMRU CYFYNGEDIG
At: Redway Road, Bonvilston, Vale of Glamorgan, CF5 6TQ.

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

On 07/01/2025, between 11:40 and 12:30.

Parts of permit assessed: All

NRW Lead Officer: Harry Warburton, accompanied by: Hannah Jenkins, Charlotte Rhodes.

Report sent to: CARS mailbox, CARS mailbox, on 05/03/2025.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
WQ-B1 - Water Quality - Operations - Permitted activities	C2 Significant	2.1.1 "Discharge of secondary treated sewage effluent via Final Effluent Discharge Point"
WQ-D3 - Water Quality - Information - Notifications	C3 Minor	4.3.1 "Natural Resources Wales shall be notified as soon as reasonably practicable following detection, within the site of the regulated facility of: Any other significant adverse environmental effects, which may have been caused by the activity, shall also be notified to Natural Resources Wales as soon as reasonably practicable following detection."
WQ-B1 - Water Quality - Operations - Permitted activities	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-B1	Provide information as to how long the overflow pipe from the primary tank that leads to the final effluent chamber and	28/04/2025

Criteria	Action needed	Complete by
	acting as a storm overflow has been operating.	
WQ-D3	Provide information as to why NRW were not notified that an unpermitted storm discharge was created with the pipework from the primary tank weir.	28/04/2025
WQ-B1	Follow GN021 and GN066 for registering unpermitted storm overflows and apply for this site.	02/06/2025

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

Compliance inspection of Bonvilston West STW for permit AG0011801 undertaken by Environment Officers Harry Warburton, Hannah Jenkins and Charlotte Rhodes. Weather at the time was dry and cold.

The site is scheduled for improvement works under AMP8. The site also suffers heavily from surface water infiltration, although it should be a foul only line. Due to the infiltration many of the sites process units are flooded.

Inlet and primary treatment

The site is fed by an unscreened gravity inlet. The effluent first enters a primary tank. The primary tank is fully submerged due to the high infiltration. There is an overflow weir which gravity feeds the overflowed effluent to a chamber that bypassed all other treatment units and straight to the final effluent chamber, which is an unpermitted storm discharge with no treatment of this effluent. This was confirmed with dye tracing that was conducted by NRW on site. When DCWW were questioned prior to the dye tracing they stated that this effluent is recirculated back up to the inlet, this was untrue as proven by the dye tracing.



Secondary treatment

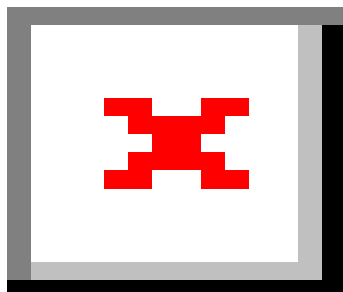
The effluent that gets treated by the primary tank then goes to the percolating filter bed. This was also significantly flooded. Following this the effluent then enters a settlement tank.

**Tertiary treatment**

Finally the effluent enters the reed bed. This was also significantly flooded and the structure of the reed bed walls was compromised where the effluent was over topping, the quantity of effluent in this reed bed is causing the walls to lean.

Unpermitted storm

During the winter months the site suffers from flooding due to infiltration, due to this an overflow pipe was set up following the weir at the primary tank. This overflow pipe takes the excess effluent to a small chamber after the settlement tank which then flows straight to the final effluent chamber, as discovered during the inspection after dye tracing the overflow pipe chamber. Videos were taken on site showing this pathway.



This would be a near continuous unpermitted discharge during the winter months due to the extent of infiltration and flooding on site. NRW have not been informed of this alteration to the site.

This is a breach of the following permit conditions:

Section 2.1.1 of the permit under Permitted activities in schedule table 1.1 states *"Discharge of secondary treated sewage effluent via Final Effluent Discharge Point"* The unpermitted storm discharge is not secondary treated effluent.

Section 4.3.1 of the permit under notifications states *"Natural Resources Wales shall be notified as soon as reasonably practicable following detection, within the site of the regulated facility of:*

Any other significant adverse environmental effects, which may have been caused by the activity, shall also be notified to Natural Resources Wales as soon as reasonably practicable following detection."

Actions:

- Provide information as to how long the overflow pipe from the primary tank that leads to the final effluent chamber and acting as a storm overflow has been operating.
- Provide information as to why NRW were not notified that an unpermitted storm discharge was created with the pipework from the primary tank weir.
- Follow GN021 and GN066 for registering unpermitted storm overflows and apply for this site.

Due to having an installed unpermitted storm overflow on the site and not informing NRW of this, this CAR is issued with a warning.

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.