

This form will report compliance with your permit as determined by an NRW officer

Site	CAPEL DEWI SEWAGE TREATMENT WORKS	Permit Ref	BN0004301		
Operator/Permit holder	CYNGOR SIR CEREDIGION C C				
Regime	WaterQuality				
Date of assessment	20/07/2018	Time in	14:45	Out	15:00
Assessment type	Audit				
Parts of the permit assessed	All				
Lead officer's name	Stone, Callum				
Accompanied by	Goddard, Jeremy				
Recipient's name/position	Cari Cook/ STW Project Manager	Date issued	18/12/2018		

Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations or the licence under the Water Resources Act 1991 as amended by the Water Act 2003. A detailed explanation is captured in "Compliance Assessment Report Detail" (Section 2) and any actions you may need to take are given in the "Action(s)" (section 4). This summary details where we believe any non-compliance with the permit has occurred, the relevant condition and how the non-compliance has been categorised using our Compliance Classification Scheme (CCS). CCS Scores can be consolidated or suspended where appropriate, to reflect the impact of some non-compliances more accurately. For more details of our CCS scheme, contact your local office.

Permit conditions and compliance summary	CCS Category	Condition(s) breached
A1 - Specified by permit	A	
B1 - Infrastructure - Engineering for prevention and control of emissions	A	
C2 - General Management - Management system and operating procedures	C3	1.1.1(a) The operator shall manage and operate the activities in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances and those drawn to the attention of the operator as a result of complaints.
E2 - Emissions - Land and groundwater	A	
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	C3	3.1.2 The limites given in schedule 3 shall not be exceeded
	C3	3.1.2 The limits given in schedule 3 shall not be exceeded
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		be exceeded
G2 - Monitoring and Records, Maintenance and Reporting - Records of activity, site diary/journal/events	A	
	C4	1.1.2 Records demonstrating compliance with condition 1.1.1 shall be maintained
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	A	
KEY: See Section 5 for breach categories, suspended scores will be indicated as such. A = Assessed or assessed in part (no evidence of non-compliance), X = Action only, O = Ongoing non-compliance, not scored.		

Number of breaches recorded	5	Total compliance score (see section 5 for scoring scheme)	16.1
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If the Number of breaches recorded is greater than zero, please see Section 3 for our proposed enforcement response

Section 2 – Compliance Assessment Report Detail

This section contains a report of our findings and will usually include information on:

- The part(s) of the permit that were assessed (eg. Maintenance, training, combustion plant, etc)
- Where the type of assessment was 'Data Review' details of the report/results triggering the assessment
- Any non-compliances identified
- Any non-compliances with directly applicable legislation
- Details of any multiple non-compliances
- Information on the compliance score accrued inc.
- Details of advice given
- Any other areas of concern
- Any actions requested
- Any examples of good practice
- A reference to photos taken

Site overview:

Capel Dewi STW (Permit Reference BN0004301) is a new Tuke & Bell treatment system serving twelve properties. The system currently discharges to ground under the authorisation of a modern Environmental Permitting Regulations (EPR) style permit which was issued on 26/11/2011. Photograph 1 below shows the STW compound at Capel Dewi.



Photograph 1: Capel Dewi STW

Final Effluent:

During the visit the final effluent sampling point was checked. There was a small amount of sewage fungus growth in the final effluent sample chamber, however the final effluent was clear with little odour to it. As the works discharges to ground we were unable to see if it was having any impact on the receiving groundwater.

Sample Exceedances since 2016:

We have reviewed the final effluent sample data taken since April 2016

Daily Volume:

According to the data you provided the estimated daily flow into the works is 7.2 m3/day. Condition 3.1.1, Schedule 3, table S3.1 of the permit stipulates that the volume of effluent discharged shall not exceed 3.27 m3/day so you are operating not in compliance with the flow condition. This will be recorded as a permit non-compliance.

Water Quality:

We have reviewed the results of the final effluent discharge samples taken since April 2016. Suspended solids (Sld Sus) are permitted to 60mg/l, Biological Oxygen Demand (BOD) is permitted to 40mg/l, pH is permitted to between pH6.0 and pH8.5 and temperature is permitted to 21 degrees celcius. There have been a number of failures since April 2016. On 21/04/2016 there was a failure for both BOD and Sld Sus (highlighted in red) which will not be scored against due to it being a historical failure. There has since been a BOD failure on 11/01/2018 and a temperature failure on 12/07/2018.

Date/Time (sampling)	0061 / pH --- Field	0076 / Temp Water °C Field	0085 / BOD ATU mg/l Low	0135 / Sld Sus@105C mg/l Low
21/04/2016 11:36	6.8	11.5	156	72
17/06/2016 10:15	7.2	19	27.3	40.5
18/08/2016 08:05	7.01	20.1	31.8	52
06/10/2016 09:46	7.14	14.1	4.78	10
05/04/2017 10:01	6.89	9.8	12	4.5
17/07/2017 15:03	7.1	20.7	20.5	30.5
11/10/2017 10:45	6.93	15.7	7.85	19.5
11/01/2018 10:15	6.66	7.6	41	12
09/04/2018 09:39	7.3	9.3	7.67	5
12/07/2018 12:20	7	24.2	12.3	18
05/10/2018 11:20	7.2	16.2	16.2	26.5

Management System:

Condition 1.1.1(a) of the permit stipulates that: The operator shall manage and operate the activities: in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances and those drawn to the attention of the operator as a result of complaints; and using sufficient competent persons and resources.

As you have no management system for the works this has been recorded as a permit non-compliance.

Condition 1.1.3 of the permit stipulates that: Any person having duties that are or may be affected by the matters set out in this permit shall have convenient access to a copy of it kept at or near the place where those duties are carried out.

As a copy of a management system was not being kept at or near the works then this has been recorded as a permit non-compliance.

Actions and Recommendations:

- Either reduce flows in to the works or apply to vary to permit to allow for greater discharge volumes.

- In preparation for upgrade of the works and eventual adoption by Dwr Cymru ensure that Pentregat is added to your routine sampling programme. This will enable us to monitor performance and permit compliance.

- The permit requires you have a written management system in place. Your contractor currently visits each sewage works on an ad-hoc basis which could lead to a gap of up to 3 months between visits. We have concerns that if a failure was to occur it could be a significant length of time before it was identified especially with no telemetry at the site and its remote location.

Developing a management system will help formalise your maintenance regime and hopefully make it less likely that if a malfunction was to occur it would result in a significant environmental impact. To assist operators in developing a management system Natural Resources Wales have developed a toolkit for permit holders who discharge up to 20 cubic metres per day of secondary treated sewage effluent to surface waters. The toolkit can be found at the following link to our website:

<https://cdn.naturalresources.wales/media/2087/management-toolkit-for-operators-holding-a-permit-for-the-discharge-of-up-to-20->

EPR Compliance Assessment Report

**Report ID:
CAR_NRW0034345**

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Section 3 – Enforcement Response

You must take immediate action to rectify any non-compliance and prevent repetition. Non-compliance with your permit conditions constitutes an offence and can result in criminal prosecutions and/or suspension or revocation of a permit. Please read the detailed assessment in Section 2 and the steps you need to take in Section 4 below.

Other than the provision of advice and guidance, at present we do not intend to take further enforcement action in respect of the non-compliance identified above. This does not preclude us from taking enforcement action if further relevant information comes to light or advice isn't followed.

Section 4 – Action(s)

This section summarises the actions identified during the assessment along with the timescales for when they will need to be completed.

Criteria Ref.	CCS Category	Action required/advised	Due Date
See Section 1 above			
G1	C3	Ensure BOD in the works is not elevated beyond the permitted levels. Ensure the works are monitored for any issues that could cause this.	31/03/2019
G1	C3	Ensure that the works operate within the permitted temperature limits.	31/03/2019
G2	C4	Ensure a site diary is kept up to date following the written management plan.	31/03/2019
C2	C3	Produce a written management system outlining to minimise the risk of pollution, including details on monitoring, maintenance, accidents and incidents.	31/03/2019
G1	C3	Either ensure volumes discharging from the works are reduced to within permitted values, or apply for a variation to the permit to allow for greater volumes.	31/03/2019

Section 5 – Compliance notes for the Operator

To ensure you correct actual or potential non-compliance we may

- Advise on corrective actions verbally or in writing
- Require you to take specific actions verbally or in writing
- Issue a notice
- Require you to review your procedures or management system
- Change some of the conditions of your permit
- Decide to undertake a full review of your permit

Any breach of a permit condition is an offence and we may take legal action against you

- We will normally provide advice and guidance to assist you to come back into compliance either after an offence is committed or where we consider that an offence is likely to be committed. This is without prejudice to any other enforcement response that we consider may be required.
- Enforcement action can include the issue of a formal caution, prosecution, the service of a notice and/or suspension or revocation of the permit.

See our Enforcement and Civil Sanctions guidance for further information

This report does not relieve the site operator of the responsibility to

- Ensure you comply with the conditions of the permit at all times and prevent pollution of the environment
- Ensure you comply with other legislative provisions which may apply

Non-compliance scores and categories

CCS category	Description	Score
C1	A non-compliance that could have a major environmental effect	60
C2	A non-compliance which could have a significant environmental effect	31
C3	A non-compliance which could have a minor environmental effect	4
C4	A non-compliance which has no potential environmental effect	0.1

Operational Risk Appraisal (Opra) - Compliance assessment findings may affect your Opra score and/or your charges. This score influences the resource we use to assess permit compliance.

Section 6 – General information

Data protection notice

The information on this form will be processed by the Natural Resources Wales (NRW) to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s). The NRW may also use and/or disclose it in connection with:

- Offering/providing you with its literature/services relating to environmental matters
- Consulting with the public, public bodies and other organisations (eg. 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 its service
- Freedom of Information Act/Environmental Regulations request

The NRW may pass it on to its agents/representatives to do these things on its behalf. You should ensure that any persons named on this form are informed of the contents of this data protection notice.

Disclosure of information

The NRW will provide a copy of this report to the public register(s). However, if you consider that any information contained in this report should not be released to the public register(s) on the grounds of commercial confidentiality, you must write to your local area office within fifteen working days of receipt of this form indicating which information it concerns and why it should not be released, giving your reasons in full.

Customer charter

What can I do if I disagree with this compliance assessment report?

If you are unable to resolve the issue with your site officer, you should firstly discuss the matter with officer's line managers using the informal appeals procedure. If you wish to raise your dispute further through our official Complaints and Commendations procedure, phone our general enquiry number 0300 065 3000 (Mon to Fri 08.00 – 18.00) and ask for the Customer Contact team or send an email to enquiries@naturalresourceswales.gov.uk. If you are still dissatisfied you can make a complaint to the Public Services Ombudsman for Wales. For advice on how to complain to the Ombudsman phone their helpline on 0845 607 0987.

Welsh Language

If you would like this form in Welsh please contact your Regulatory Officer.