

Compliance Assessment Report CAR_NRW0046799

Permit being assessed: AG0009101

For: Cowbridge Wastewater Treatment Works, held by DWR CYMRU CYFYNGEDIG
At: Lake Farm, St Athan Road, Cowbridge, CF71 7HY.

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

On 20/02/2025, between 09:30 and 10:30.

Parts of permit assessed: Relevant conditions

NRW Lead Officer: Charlotte Rhodes, accompanied by: Alexander Grainger.

Report sent to: DCWW CARS Mailbox, DCWW CARS Mailbox, on 31/03/2025.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
WQ-D3 - Water Quality - Information - Notifications	Action only (X)	
WQ-D3 - Water Quality - Information - Notifications	Action only (X)	
WQ-C1 - Water Quality - Emissions and monitoring - Emissions to water	Action only (X)	
WQ-B4 - Water Quality - Operations - Improvement programme	C3 Minor	3.3.1(a)
WQ-B3 - Water Quality - Operations - Operating techniques	C3 Minor	2.3.2(a)
WQ-B1 - Water Quality - Operations - Permitted activities	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-D3	Please submit a copy of the OPNOT for MCERT cleaning and maintenance.	30/04/2025
WQ-D3	Please submit a copy of the OPNOT relating to the mains power failure on 29/01/2025.	30/04/2025
WQ-C1	Investigate where flow witnessed at the storm outfall during inspection was originating from, since the site was not considered to be "in storm", and report back with findings and any planned remediation.	30/05/2025
WQ-B4	Please explain why overflow into storm storage monitoring (EDM) was not installed prior to the condition becoming effective (01/01/2024). Provide a plan with timescales to rectify this as soon as possible.	30/05/2025

Criteria	Action needed	Complete by
WQ-B3	Please explain what is being done to manage infiltration within the catchment and any associated timescales.	30/05/2025

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

Introduction

On 20th February 2025, Officers C RHODES and A GRAINGER visited Cowbridge Wastewater Treatment Works (WwTW) for a routine inspection of permit reference **AG0009101**. Officers were accompanied by the Catchment Performance Manager, Process Science Technician, Operational Area Supervisor and colleagues. The weather was cold with light rain and heavy rain preceding.

Permit background

The current permit was varied in April 2023 and prior to this, the previous final effluent permit (AG0009101) was modernised and consolidated with the permit for the discharge of storm sewage from the site (AF3010501).

Officer RHODES previously inspected this site on 6th December 2023 and raised concerns with the storm tanks and discharge – see CAR_NRW0043249.

Inlet & Primary Tanks

There are two sources arriving at the inlet coming from Llanblethian sewage pumping station (SPS), which operates both foul and storm pumps, and Brookfield Park SPS both of which are labelled. All flows are then screened mechanically in line with **Condition 2.3.2(d)** and actions following the previous inspection confirmed the aperture size to be 6mm as permitted. There are two screens in operation, duty and standby, and a manual bypass but it was noted that the levels in the overflow

channel were quite high.

The rag skips are emptied on an ad hoc basis and the site reportedly serves 3-4 sludge tankers per week.



Condition 3.3.3 – MCERTS flow meter is a Magflow situated between the inlet and primary tanks (pictured above). The certification is within date and was updated recently as was due in 2025.

Condition 3.3.4 – It was noted in the previous inspection that there was no bypass available for the Magflow to be cleaned and maintained in the current configuration, yet there is one for the adjacent ferric dosing unit. Since then, conversations have been had to relocate the MCERT to just downpipe of the ferric dosing unit to accommodate bypassing for maintenance, but there is currently no timescale on delivering this. At present, flows are overpumped into the distribution to primary tanks whilst the flow meter is cleaned with a jetter and camera surveyed – this was done recently for a period of 1 hour for which operatives believe an OPNOT was submitted but one was not able to be found in our records. **Action: please submit a copy of this OPNOT for MCERT cleaning and maintenance.**



Both primary tanks (one pictured above) seemed to be in good working condition with auto-de-sludge in place and manual sludge judging done periodically as required. The misalignment of a sweeping brush noted during last inspection had been rectified and is now operating as expected.

Storm tanks

All four storm tanks were relatively full, that closest to the overflow to discharge demonstrating a thick sludge blanket. The sampling point for storm discharge was signposted and located at the overflow weir at the edge of this tank, but the permit should be updated reflect to this location.



View of storm tanks from the inlet platform

The storm tanks did not appear to be filling nor discharging at the time of visit, however a steady trickle was coming out of the outfall when inspected and some rag was visible. **See actions.**



When asked, it was stated that there is no Event Duration Monitoring (EDM) into storm storage at present. **This constitutes a non-compliance with Condition 3.3.1(a)** and consequently, Table S3.4b Monitoring points which contains Flow Passed Forward monitoring and Overflow operation (into storm storage) for Settled Storm Sewage.

Action: Please explain why overflow into storm storage monitoring (EDM) was not installed prior to the condition becoming effective (01/01/2024). Provide a plan with timescales to rectify this as soon as possible.

Condition 2.3.2 – In the previous CAR concerns were raised with regard to the storm storage capacity and discharge frequency, asking why flow greater than the overflow to storm setting was still coming into the works after 2 days of dry weather before the last inspection. The response to this stated that “the sewerage network surrounding Cowbridge WwTW experiences a longer drain down time due to surcharging and ground water infiltration.” This therefore demonstrates a **non-compliance with Condition 2.3.2(a)**. **Action: Please explain what is being done to manage infiltration within**

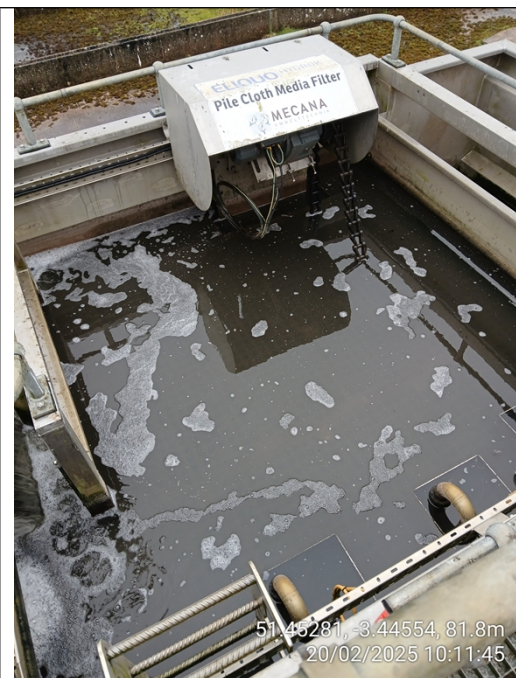
the catchment and any associated timescales.

Condition 2.2.1 – Both final effluent and storm effluent were discharging from the permitted locations. This is reflected in the scoring as B1.

Secondary & Tertiary Treatment

The Final Settlement Tanks were in good working order and the preceding gravity filter beds appeared to be in reasonable working order, however operatives were advised to clear some of the vegetation growth so as to prevent any impact on treatment. Flows are then pumped to a pile cloth media filter (Mecana filter) which is primarily self-cleaning but is manually cleaned weekly in addition; flows then return to the final effluent discharge point via gravity.





The final effluent discharge sample point was clearly labelled and the outfall was inspected from the opposite river bank: vegetation growth was visibly taking over the railings but as long as this is cleared by the spring/summer this should not have an impact on inspection and maintenance.



Within the site records it was observed that there was a mains power failure on 29/01/2025 which required a reset – **please share the OPNOT pertaining to this for our records.**

Summary

In conclusion, the site was found to be **non-compliant** with its permit with respect to Conditions

2.3.2(a) and 3.3.1(a). A written Warning is hereby enclosed and the following Actions:

1. Please submit a copy of the OPNOT for MCERT cleaning and maintenance.
2. Please submit a copy of the OPNOT relating to the mains power failure on 29/01/2025.
3. Investigate where flow witnessed at the storm outfall during inspection was originating from, since the site was not considered to be "in storm", and report back with findings and any planned remediation.
4. **Please explain why overflow into storm storage monitoring (EDM) was not installed prior to the condition becoming effective (01/01/2024). Provide a plan with timescales to rectify this as soon as possible.**
5. Please explain what is being done to manage infiltration within the catchment and any associated timescales.

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.