

Compliance Assessment Report CAR_NRW0045584

Permit being assessed: XB3990HH

For: CSO@WOLFSDALE SPS, held by DWR CYMRU CYFYNGEDIG

At: WOLFSDALE, PEMBROKESHIRE, PEMBROKESHIRE, SA62 6JH.

Type of assessment carried out: Audit, Reason: Routine.

On 23/10/2024, between 12:00 and 12:30.

Parts of permit assessed: Monitoring and reporting conditionss

NRW Lead Officer: Rod Thomas.

Report sent to: CARS@dwrcymru.com, CARS mailbox, on 25/03/2025.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
WQ-C1 - Water Quality - Emissions and monitoring - Emissions to water	C3 Minor	Table S1.3, and Table S3.3

Result types are explained in more detail in the 'Important Information' section below.

2. What action is required?

Criteria	Action needed	Complete by
WQ-C1	Review that the requirements of Table S1.3 and S3.3 have been actioned.,	10/01/2025

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

Site audited on 23 Oct 2024, At the time it was not clear if the requirements in tables S3.1 and S3.3, were being met, confirmation requested by 10 Jan 2025.

The permit does not have a pass forward flow included suggesting the necessary information to include one has not been provided.

Current response is advice and guidance, this could escalate depending on response to above.

If the pass forward flow is known please also provide this by the date above

Email received from DCWW 16 January 2025

Apologies for the delay in updating you. DCWW have managed to speak with NRW permitting regarding the CAR form for Wolfsdale SPS and the improvement conditions in table S1.3. Due to the amount of information requested in the improvement condition, it is taking longer than initially anticipated to gather all the relevant details. This involves multiple DCWW teams and determining the ownership of the required information.

Could we provisionally extend the due date to 6th February 2025, please? DCWW are organising a meeting with NRW Permitting to bring all the relevant people together to review the improvement condition. We will then look to populate the attached document to issue to you. Until we hold the meeting, it is unclear whether all the information is readily available, which may necessitate a further extension. DCWW will provide another update following the meeting.

NRW agree to an extension request of 6 February 2025

Email received by DCWW 24 March 2025

Action 1: Review that the requirements of Table S1.3 and S3.3 have been actioned.

*In response to a CAR_NRW0045584 where the following question was posed, "At the time it was not clear if the requirements in tables S3.1 and S3.3, were being met". Since **Table S3.1 Point Source emissions to water (other than sewer) – emission limits and monitoring requirements** is not in use in intermittent discharge permits such as XB3990HH for Wolfsdale SPS. We assumed that this related to **Table S1.3 Improvement programme requirements**.*

*The **Table S1.3 Improvement programme requirements** are multifaceted and far more onerous than most of our intermittent assets with similar IC's which simply ask for a weir setting, method of calculation and storage volume. Much of this has since been superseded by our requirement to develop a Drainage and Wastewater Management Plan (DWMP); the development of the Storm Overflow Assessment Framework (SOAF); and the requirements of the NRW GN066 'How to classify storm overflow performance' regulatory guidance:*

Closed and Verified

25 March 2025

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.