

Compliance Assessment Report CAR_NRW0048256

Permit being assessed: CG0341601

For: Criccieth Wastewater Treatment Works, held by DWR CYMRU CYFYNGEDIG

At: Off A497, Criccieth, Gwynedd, LL52 0SJ.

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

On 04/10/2023 - 04/10/2024.

Parts of permit assessed: 2.3.3

NRW Lead Officer: James Raymond.

Report sent to: CARS Mailbox, Regulatory Compliance Officer, on 23/05/2025.

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	C2 Significant	2.3.3

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	Please ensure that permitted flow of at least 33 litres/sec is treated at all times before flow is directed to the Storm Tank.	05/09/2025

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

The site is permitted (CG0341601) to discharge to storm tanks and off-site to the Tremadog Bay when the flow exceeds 33 litres per second. Flow data supplied is Flow Passed Forward and assumed to be collected from a meter after the weir that feeds the storm tank. This assessment covers a full year of data (04/10/2023 – 04/10/2024).

To begin with, permit condition 2.3.3 (a) *The discharge shall only occur when and only for as long as the flow passed forward is equal to or greater than the overflow setting indicated due to rainfall and/or snow melt.*

Using the data provided, an estimated volume discharged from the storm tank was calculated. By omitting data points when EDM was not “firing” at 100, the remaining flow points are only those measured while water is being discharged from the storm tank, though this includes flow rate below the permitted overflow setting of 33l/s and flow above this rate. Taking the average flow for this filtered data, we can subtract it from the permitted speed, the result giving us an assumed volume not passing through the works (i.e. being discharged). By multiplying this value by 60 (as data is provided as litres per second), and then multiplying by the number of timestamps, we can see an estimated litres spilled. The sum of these data points showing EDM discharging water from the storm tank is 55,561,953 litres. Remember this value **includes** compliant flows which exceed the permitted overflow setting, and is an “average” calculation.

We can also compare timestamps for the spill events. This whole dataset is made of 447,927 timestamps (each 1 minute). Where the STW is discharging off-site while FPF is below the permitted rate (33 l/s), there are 46,337 timestamps. This indicates that for 11% of the dataset the works is discharging off-site while failing to meet PFF.

Flows below 90% permitted rate

By repeating the calculations for 2.3.1 (a) but changing the filter for the flow/s to values below 90% of the permitted rate (29.7 l/s), we can see that up to 9,960,346 litres was discharged out of the storm tank in breach of permit during 2023. When looking at

flows below 90% the number of timestamps is 23,475 which equates 50.6% of the total time in which the site was discharging off site.

1. The full length of the data provided is 447,926 timestamps/minutes (a year with some missing data points)
2. The time Criccieth was discharging offsite while below PFF was calculated as 46,337 timestamps/minutes
3. The time Criccieth was discharging offsite while below 90% PFF was calculated as 23,475 timestamps/minutes
4. Therefore 50.6% of the total spill time in breach of permit, was while flows were below 90% of the overflow setting ($23,475 / 46,337$)
5. As a percentage of the full length of the total dataset provided, this equates to about 5% ($23,475 / 447,936$)

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.