

Compliance Assessment Report CAR_NRW0046357

Permit being assessed: BP0282301

For: Settled Storm and Emergency Overflow at Picton Place SPS, held by DWR CYMRU CYFYNGEDIG

At: County Hall Car Park, Freemans Way, Pembrokeshire, SA61 1UG.

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

On 18/02/2025, between 11:40 and 12:00.

Parts of permit assessed: Monitoring and Reporting Conditions

NRW Lead Officer: Rod Thomas, accompanied by: Caryl Brace.

Report sent to: CARS@dwrwymru.com, CARS Mailbox, on 09/06/2025.

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 S3.1 A1

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	Confirm how operationally this issue can be avoided in the future	01/04/2025

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

DCWW explained that there was an issue for 48 - 72 hours, where by approx 100 litres were being passed forward. Rod has emailed to get a better idea as to what happened.

Email received from DCWW on 27 February 2025

The flow dropped off intermittently between 16:33 on the 26/01/25 to the 29/01/25. During this time the flow fluctuated between its FPF of 120l/s to 99l/s.

For example at approximately 16:33 on the 26th to 23:24 on the 26th flow dropped to 112l/s, from 23:24 on the 26th to 06:21 on the 27th flow dropped to 99l/s. From approximately 06:21 on the 27th to 13:30 it increased back up to 121l/s until it drops back at 13:30 to 112l/s until 20:31. The flow follows the same pattern until approximately 10:00 on the 29th where the senior craft attended site.

Incident has been discussed with NRW Regulatory Approaches Team who agreed with our approach and response.

Please confirm that the root cause has been established in order to prevent an occurrence.

Deadline for response please, 2 May 2025**Email received from DCWW 9 June 2025**

'The root cause of the flow fluctuations has not been definitively established. Investigations were conducted by both a mechanical fitter and an instrument technician, but they were unable to diagnose the exact cause of the fluctuations. The entire operational team has been informed about the incident and reminded to escalate any occurrences of low flow promptly so that investigations can be carried out as soon as reasonably practicable if the issue repeats itself.'

The flow fluctuations were observed intermittently between 16:33 on the 26th of January to the 29th of January, with flow rates varying between 120 l/s and 99 l/s. Despite thorough checks and testing of the pumps, no clear issues or potential causes for the drop-off in flow were identified. Therefore, while the immediate issue was resolved by turning the pumps off, testing them, and returning them to auto mode, the underlying cause remains unknown. To prevent reoccurrence DCWW will continue to monitor performance and ensure prompt escalation to manage any potential future occurrences effectively.

A more detailed overview on the incident shows that the flow dropped off intermittently between 16:33 on the 26/01/25 to the 29/01/25. During this time the flow fluctuated between its FPF of 120l/s to 99l/s. You can see this in the trend below. For example at approximately 16:33 on the 26th to 23:24 on the 26th flow dropped to 112l/s, from 23:24 on the 26th to 06:21 on the 27th flow dropped to 99l/s. From approximately 06:21 on the 27th to 13:30 it increased back up to 121l/s until it drops back at 13:30 to 112l/s until 20:31. The flow follows the same pattern until approximately 10:00 on the 29th where the senior craft attended site.'

Closed and Verified - 9 June 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.