

Compliance Assessment Report CAR_NRW0048900

Permit being assessed: VP3722GM

For: TOWER SURFACE MINE, held by TOWER REGENERATION LIMITED

At: TREHERBERT ROAD, HIRWAUN, ABERDARE, MID GLAMORGAN, CF44 9UF.

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

On 10/07/2025, between 13:00 and 13:30.

Parts of permit assessed: All

NRW Lead Officer: Ceri Malone, accompanied by: Natalie Wrangham.

Report sent to: Mike Dunleavy, TRL Operator, on 21/07/2025.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
WQ-A1 - Water Quality - Management - General management	C3 Minor	1.1 General Management
WQ-B1 - Water Quality - Operations - Permitted activities	Assessed (A)	
WQ-B2 - Water Quality - Operations - The site	Assessed (A)	
WQ-C1 - Water Quality - Emissions and monitoring - Emissions to water	Assessed (A)	
WQ-C1 - Water Quality - Emissions and monitoring - Emissions to water	C4 No impact	3.3 Monitoring
WQ-D1 - Water Quality - Information - Records	C4 No impact	4.1 Records

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

2. What action is required?

Criteria	Action needed	Complete by
WQ-A1	Produce a written management system for the PTP which is compliant with 1.1 of the permit.	21/10/2025
WQ-C1	Provide clear access to the discharge/monitoring location.	21/10/2025
WQ-D1	Keep on site all records, plans and the management system to ensure compliance with 4.1 of the permit.	21/10/2025

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

Sewage Discharge from Klargester Unit at Tower Opencast (EPR-VP3722GM)

Site Report

13:00

A compliance visit to inspect the secondary treated sewage discharge from a PTP at Tower Colliery (EPR-VP3722GM) was completed on 10/07/2025. A Natural Resources Wales (NRW) Environment Officer and Senior Officer were in attendance along with a Tower Regeneration Limited (TRL) operator. The weather was dry and hot with very little rain over the week prior.

We first inspected the PTP unit which discharges secondary treated domestic effluent generated on site by toilet and hand washing facilities. The unit is large and had sufficient capacity (*photograph 1*).



Photograph 1: PTP

The PTP is situated at the location described in 2.2 of the permit with a discharge/monitoring point (*photograph 2*) at NGR SN 94186 05790, a tributary of the Afon Cynon.



Photograph 2: Discharge/Monitoring Location

An alarm system was present on the external wall of the PTP with no indication of any fault with the unit. The PTP appeared to be in good condition and operating as designed. As per 3.1 of the permit a maximum flow of 3m³/day is permitted. We were informed by the operator that due to the minimal facilities and staff on site this limit would never be exceeded. There was no discharge at the time of our inspection and no visible effect on the watercourse or grease/oil was seen.

The operator informed us that no management system was currently kept for the PTP.

Breaches of permit condition:

1.1 General Management

- No written management system, records or copy of the permit was available on site.

3.3 Monitoring

- Suitable access to the discharge/monitoring location has not been maintained due to overgrowth.

4.1 Records

- No records have been kept for the maintenance/management of the PTP.

Action required by dates specified:

- Produce a written management system for the PTP which is compliant with 1.1 of the permit. Complete this by 21/10/2025
- Provide clear access to the discharge/monitoring location. Complete this by 21/10/2025

- Keep on site all records, plans and the management system to ensure compliance with 4.1 of the permit. Complete this by 21/10/2025

Other advisory comments:

Advice on how to develop a management system for the PTP can be found here:

[Natural Resources Wales / Develop an Environment Management System for the discharge of up to 20 cubic metres per day of sewage effluent](#)

Contact details:

If you have any other queries regarding this CAR form or to provide an update on any actions above, please contact me using the following details: Ceri Malone, Environment Officer, Ceri.Malone@naturalresourceswales.gov.uk

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.