

Compliance Assessment Report CAR_NRW0049065

Permit being assessed: AN0295601

For: CEFN CARNAU UCHAF THORNHILL, held by Elysium Healthcare No.3 Limited

At: CEFN CARNAU UCHAF, THORNHILL, CAERPHILLY MOUNTAIN, ,, CF82 1LY.

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

On 07/08/2025, between 10:05 and 10:50.

Parts of permit assessed: Site operations and infrastructure.

NRW Lead Officer: Elis Nuttall.

Report sent to: George Reilly, Maintenance & Health and Safety Lead, on 15/08/2025.

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	Action only (X)	
WQ-D1 - Water Quality - Information - Records	Action only (X)	
WQ-B3 - Water Quality - Operations - Operating techniques	Action only (X)	
WQ-A1 - Water Quality - Management - General management	Action only (X)	
WQ-B1 - Water Quality - Operations - Permitted activities	Action only (X)	

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	Provide details of the new sewage treatment system and drainage layout.	Already completed
WQ-D1	Provide examples of waste transfer notes for solids removal from the system.	29/08/2025
WQ-B3	Check if and where the flow monitoring structure is located with photos of evidence. If it cannot be identified then provisions for a flow monitoring structure should be provided.	19/09/2025
WQ-A1	Strim area around sample point to improve access/visibility and provide evidence of its completion.	29/08/2025
WQ-B1	Confirm if the location of sample point observed is the only official one on site.	29/08/2025

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 Visit Report

This report details the site visit made by Natural Resources Wales (NRW) on the 07/08/2025 to Cefn Carnau (Elysium Healthcare) permit reference number EPR-AN029560.

I (NRW Environment Officer Elis Nuttall) attended Cefn Carnau at Cefn Carnau Ln, Thornhill, Caerphilly, CF83 1LX for a water quality permit compliance inspection at 10:05 where I met with the site's Maintenance & Health and Safety Lead (GR). The weather was mild and raining during the visit.

General Observations

The site is a rehabilitation centre with capacity for 22 clients/beds and staff numbers of ~50. The sewage discharges are served by a package sewage treatment plant which discharges to an unnamed pond and then to a tributary of the Scouring Brook.

The system is consented to discharge a maximum of 17m³/d of secondary treated sewage effluent. There are no conditions that stipulate tertiary treatment is required. A flow measurement structure is required to enable daily discharges to be measured. The discharge composition shall not contain more than:

- 20mg/l of biochemical oxygen demand (BOD)
- 30mg/l of total suspended solids (TSS)
- 15mg/l of ammoniacal nitrogen (N).

The site was operational at the time of the visit

Initial Discussion

A brief pre-inspection meeting was held with GR who gave a history of the system and the updates undertaken since the previous compliance visit in 2023.

It was noted that the old site building is no longer in use where previous overloading of the sewage system was occurring. Additionally, a new package sewage treatment plant has been installed near the new building (~ST1613284891), with the legacy system isolated and no longer in use. This old infrastructure is however still in place, but there are no intentions to use it in future. Both the sample and discharge points remain consistent with

the locations specified in the permit. I requested that details of the new system be provided for review and reference, however it was stated that the volume of discharges and treatment capacity have not changed. This is reflected in the actions list below.

Maintenance regimes have not changed, with the solids tank undergoing emptying every 2 months by an external contractor, however weekly checks are undertaken, and, due to the nature of the site, site staff remove large solid items as necessary so that the system can operate as designed. I requested examples of the waste transfer notes as evidence of this maintenance. This is reflected in the actions list below.

The site now benefits from a “storm saver” surface water management system that captures surface/rain water in soakaways and re-uses it on site for use (flushing toilets etc.). As such, no surface water is discharged via the sewage treatment system.

Condition 6 of the permit stipulates that:

a flow measurement structure shall be provided and maintained to enable the daily discharge to be measured or determined as required.

When I queried this with GR it was stated that they were unsure about this but that they would check. I have reflected this in the actions list below.

We then commenced the site infrastructure inspection.

Site Infrastructure Inspection

The new sewage treatment system was observed to be located at ~ST1613284891. This system is completely underground as opposed to the old system. Each chamber was lifted in turn for inspection.

Chamber 1 is the primary solids settlement chamber. This was observed and appeared as expected with adequate capacity. As stated this is emptied every 2 months based on visual checks. The condition of the chamber is evidenced in Figure 1.



Figure 1 – Primary solids separation chamber as observed during the visit.

Chamber 2 is the aeration and bio media chamber. As observed in Figure 2, the aeration system was in good working order at the time of the visit with no visible solids carry over.



Figure 2 - Aeration and bio media chamber as observed during the visit.

Chamber 3 is the final treated effluent chamber. There were no solids present, and the effluent appeared clear with no strong odour. This can be seen in Figure 3.



Figure 3 – Final treated effluent chamber as observed during the visit.

The control box for the system (Figure 4) was inspected. No apparent faults or issues were noted and it was working as designed.



Figure 4 – The treatment system control box as observed during the visit.

We then proceeded to inspect the stated sample point (as outlined by GR) which was located at ~ST1614884980. This is around 23m away from the consented sample point outlined in Condition 4 of the permit. I request that GR check the listed location (as seen in Figure 5) and confirm if there is a second access point where sampling can be undertaken. If not, a variation of the permit may be required to accurately indicate the point where samples can/should be taken.

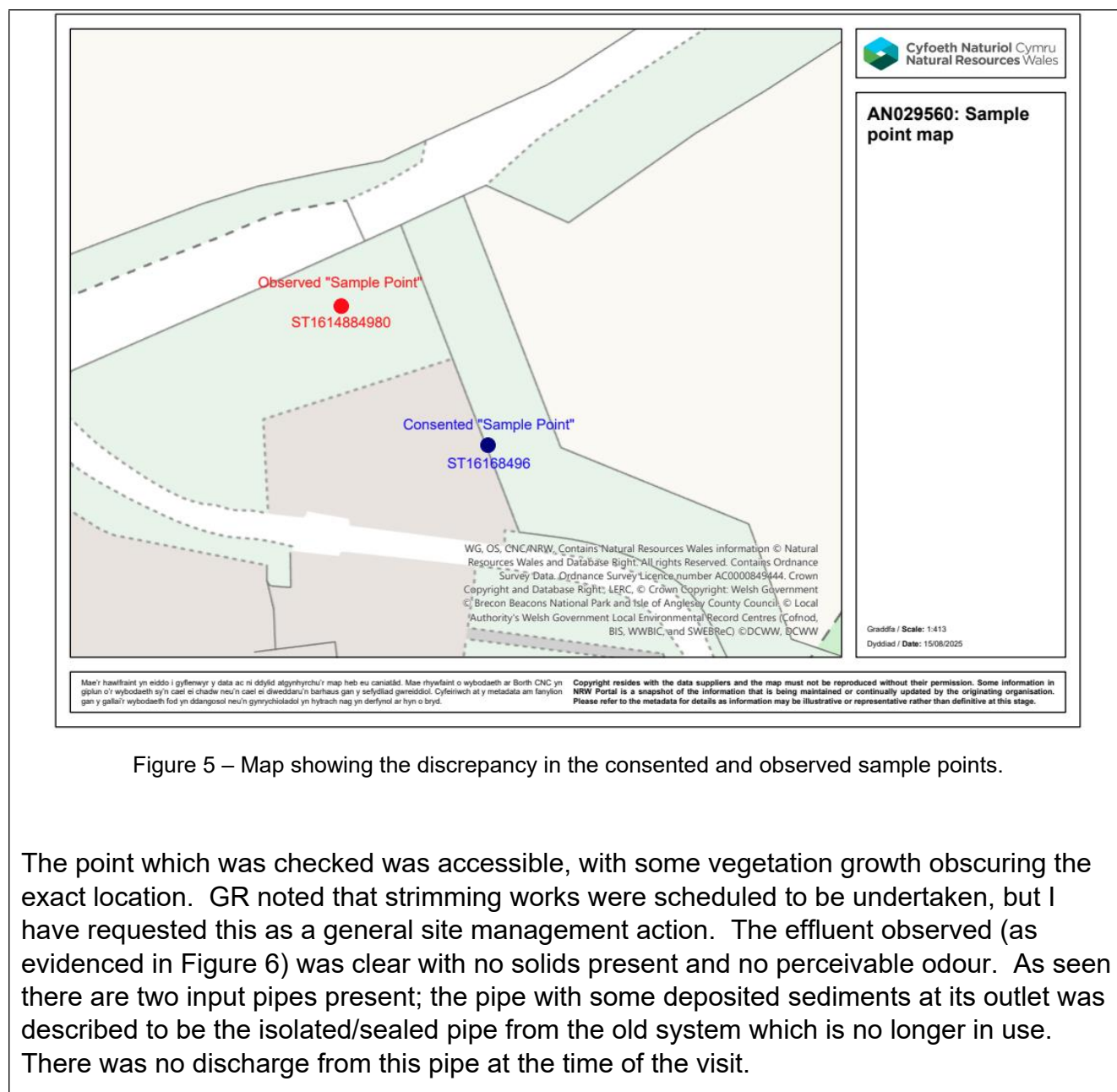


Figure 5 – Map showing the discrepancy in the consented and observed sample points.

The point which was checked was accessible, with some vegetation growth obscuring the exact location. GR noted that strimming works were scheduled to be undertaken, but I have requested this as a general site management action. The effluent observed (as evidenced in Figure 6) was clear with no solids present and no perceivable odour. As seen there are two input pipes present; the pipe with some deposited sediments at its outlet was described to be the isolated/sealed pipe from the old system which is no longer in use. There was no discharge from this pipe at the time of the visit.



Figure 6 – The observed sample point at the time of the visit. Consistent clear flow can be see discharging. Note the defunct and isolated input from the old system in the top left of the chamber.

The old treatment system tank is still in place (Figure 7), however as stated there is no input into it and all pumps have been removed and power supply cut. Each chamber was stated to have been emptied, leaving no residual effluent within them. However, it is advised that the site explore the option to remove this infrastructure to avoid any unforeseen issues.



Figure 7 – The old treatment system as observed during the visit.

The discharge to the pond was inspected. While the exact point could not be accessed due to heavy vegetation growth, the pond was observed to be clear of any distinct impacts and displayed no discolouration. No odour or fungus was observed. This is evidenced in Figure 8. No further observations were made.



Figure 8 – The pond which the discharge enters as observed during the visit.

On returning to the site building, I confirmed my observations with GR and outlined several actions which I would be including in this report. No further comments were made or questions asked/answered.

I left site at 10:50.

Breaches of permit conditions:

No breaches were recorded during this visit, provided the actions below can be confirmed.

Action required by dates specified:

1. Provide details of the new sewage treatment system and drainage layout.

Deadline: Completed

2. Provide examples of waste transfer notes for solids removal from the system.

Deadline: 29/08/2025

3. Check if and where the flow monitoring structure is located with photos of evidence. If it cannot be identified then provisions for a flow monitoring structure should be provided.

Deadline: 19/09/2025

4. Strim area around sample point to improve access/visibility and provide evidence of its completion.

Deadline: 29/08/2025

5. Confirm if the location of sample point observed is the only official one on site.

Deadline: 29/08/2025

If we do not receive the information requested within specified deadline and have not been informed as to why there is a delay then we may serve a Regulation 60 Notice requiring the information under Environmental Permitting (England and Wales) Regulations 2016.

Other advisory comments:

1. Explore the options for the removal of the old treatment system infrastructure.

Please note this is an advisory comment only and not an action required in line with any permit condition(s).

Contact details:

If you have any queries regarding this CAR form or to provide an update on any actions above, please contact me using the following details: Elis Nuttall, Environment Officer, elis.nuttall@naturalresourceswales.gov.uk, 03000 65 4651.

Thank you,

Elis Nuttall.

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.