

Compliance Assessment Report CAR_NRW0049549

Permit being assessed: BG0013202

For: Storm Overflow from Llanddewi Velfry Wastewater Treatment Works, held by DWR CYMRU CYFYNGEDIG

At: Access track off A40 near 'Bronawel', Llanddewi Velfrey, Narberth, SA67 7PA.

Type of assessment carried out: Report/Data Review, Reason: Routine.

On 31/12/2024 - 03/10/2025.

Parts of permit assessed: EDM Monitoring

NRW Lead Officer: Rod Thomas.

Report sent to: CARS Mailbox, CARS Mailbox, on 19/11/2025.

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	C4 No impact	3.2. The operator shall, unless otherwise agreed in writing by Natural Resources Wales, undertake the monitoring specified in the following tables in schedule 3 to this permit: (a) point source emissions specified in tables S3.1 and S3.4.
WQ-A1 - Water Quality - Management - General management	C2 Significant	1.1.1 The operator shall manage and operate the activity: (a) in accordance with a written management system that identifies and minimises risks of pollution so far as is reasonably practicable, including those risks arising from operations, maintenance, accidents, incidents, non-conformances and those drawn to the attention of the operator as a result of

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
		complaints; and (b) using sufficient competent persons and resources.
WQ-D2 - Water Quality - Information - Reporting	C4 No impact	4.2.2 Within the time period after the end of the reporting period specified in schedule 4 table S4.1 the operator shall, unless otherwise agreed in writing by Natural Resources Wales, submit reports of the monitoring and assessment carried out in accordance with the conditions of this permit, as follows: (a) in respect of the parameters and monitoring points specified in schedule 4 table S4.1; (b) for the reporting periods specified in schedule 4 table S4.1 and using the forms specified in schedule 4 table S4.2; and (c) giving the information from such results and assessments as may be required by the forms specified in those tables.

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 explain what action you will take to increase the EDM operational time to ensure compliance with the permit conditions	03/11/2025
WQ-A1	1. Please explain why the management system failed to provide accurate data for submission as required by the permit condition.	03/11/2025
WQ-D2	Ensure that future EDM data is correct and submitted within 2 months of the 1 January each year.	28/02/2026

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

EDM operational time data was originally submitted to NRW in February 2025. DCWW then resubmitted the data with corrections in May 2025. This assessment has therefore been made using the resubmitted data.

During a routine compliance assessment check that we have carried out on 03/10/2025 it was noted that the EDM operational time for this asset was less than the minimum of 90%.

The operational time provided in the 2024 EDM Annual return for BG0013202, Llandewi Velfrey STW Narberth, Pembrokeshire was 76.91%.

Condition 3.2.1 states that *"The operator shall, unless otherwise agreed in writing by Natural Resources Wales, undertake the monitoring specified in the following tables in schedule 3 to this permit: (a) point source emissions specified in table S3.1 and table S3.4"*

Guidance for scoring the non-operational time suggests that this may have had a C4

Category 4: when the EDM is operational for 60.01-89.99% of the calendar year. It's reasonably foreseeable that that there will be no environmental impact as the % indicates that the overflow is receiving reasonable monitoring and that the operator is likely to have reacted to any operational issues in a timely manner.

The data submitted was initially made within the required deadline as specified by the permit (28th February 2025). The data was then resubmitted after the deadline. The resubmission was made because the original data was erroneous. This resulted in condition 4.2.2 being breached as the correct data was not submitted within the deadline.

The permit holder had been operating the asset whilst using erroneous data relating to discharges. This had the potential to result in discharges being made without a system which minimised pollution. This has the potential to lead to significant

impacts on the environment and is a breach of permit condition 1.1.1.

Actions - Please carry out the actions specified above to comply with the permit condition.

Email received from DCWW 18/11/2025

Llandewi Velfry is now reported on under permit number BG0013201. In response to the Corrective action, for the current year, the percentage of time that the equipment has been operational is above 90%, therefore we can confirm the EDM Asset is performing as expected. The original equipment was unserviceable and we replaced with a Radar and probe 9/2/24 , we will plan in to change the probe to a Radar instrument at some point so we have dual radars

Action: Please explain why the management system failed to provide accurate data for submission as required by the permit condition.

Our management system failed to provide accurate data for submission due to technical and process issues. Although our processes eventually enabled us to identify the technical failure and resubmit the data, this occurred outside the required timeframes.

The primary issue was a tool that did not update data validation flags, leading to discrepancies between reviewed and reported data. In addition, some files were not correctly transferred from telemetry to our data archive on certain dates, resulting in missing data for several assets.

While initially thought to be caused by communication failures, further investigation revealed that the root cause was a data pipeline issue.

Action: Ensure that future EDM data is correct and submitted within 2 months of the 1 January each year.

Processes and tools have undergone a comprehensive review to enhance data accuracy for regulatory reporting in 2026

Closed and Verified

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.