

Compliance Assessment Report CAR_NRW0049947

Permit being assessed: AN0305101

For: SIX BELLS MINEWATER TREATMENT SCHEM, held by The Coal Authority
At: SIX BELLS MINEWATER TREATMENT, FORMER EMPRESS CAR SALES SITE, ADJ ABERTILLERY LEISURE CENTRE, ABERTILLERY, .

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

On 06/11/2025.

Parts of permit assessed: Emissions limits

NRW Lead Officer: Elis Nuttall.

Report sent to: Alice Mellor, Environmental Compliance Manager, on 25/11/2025.

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	C3 Minor	7 - Composition
WQ-B3 - Water Quality - Operations - Operating techniques	Action only (X)	
WQ-D3 - Water Quality - Information - Notifications	Action only (X)	
WQ-B1 - Water Quality - Operations - Permitted activities	Action only (X)	
WQ-D3 - Water Quality - Information - Notifications	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-C1	Implement mitigation strategies to reduce the total Fe concentration in the final discharge and bring it back into compliance.	25/12/2025
WQ-B3	Continue monitoring discharge composition on a twice weekly basis until consent levels have been achieved and are stable.	25/01/2026
WQ-D3	Inform NRW of when the discharge has returned to consented levels.	25/01/2026
WQ-B1	Cease all non-permitted works at Six Bells MWTS. Any change in operations will require a permit variation to legally undertake.	25/01/2026
WQ-D3	Inform NRW once the reed cut and hydrogen peroxide dosing is complete on site.	25/01/2026

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

Discharge composition self-report, Six Bells MWTS

This report details the consent breach notification sent by The Mining Remediation Authority (MRA) to Natural Resources Wales (NRW) on the 14/11/2025 regarding the Iron (Fe) concentrations measured in the final discharge at Six Bells Mine Water Treatment Scheme (MWTS), permit reference number EPR-AN0305101.

I (NRW Officer Elis Nuttall) received the notification from MRA's Senior Geochemist (AM-P).

Self-Report Details

On 14/11/2025 EN received an email from AM-P noting that the routine monitoring at Six Bells MWTS on the 06/11/2025 had returned a breach of the consented Fe levels (permitted limit of 2mg/L) with concentrations measured at 4.16mg/L.

It was noted by AM-P that essential de-sludging works were being carried out on lagoon 1 at Morlais MWTS, with the material being placed into the sludge drying bed (SDB) at Six Bells MWTS. They believe that the supernatant water being pumped from the SDB, which is being put through the scheme for treatment, is behind the increase in iron that is being observed; there has been little to no change in the abstraction rates and raw iron concentrations at Six Bells MWT itself.

MRA have contacted Severn Trent Services (STS) to inform of them of this, and to request that they slow the rate at which they are pumping out of the SDB which should rectify the situation, and to closely monitor what is happening at the consented discharge.

Several photos were submitted (Figure 1) as evidence showing the watercourse was not affected.



Figure 1 – Photos showing apparent lack of impact on the watercourse.

While I appreciated the proactive steps to rectify the issue, I noted that the actions and operations resulting in this breach of Fe concentrations should be ceased as soon as practicable, to only treat the abstracted mine water from the site itself and to only conduct the operations specified in the permit for Six Bells MWTS. Actions to reflect this have been outlined below.

I received confirmation on the 24/11/2025 from MRA's Operations Manager (RK) that the pumping of the water from the SDB at Six Bells had been paused. RK also noted that hydrogen peroxide dosing will begin at Six Bells the week of 24/11/2025 as a control measure for a reed cut at the scheme that is being mobilised this week. The chemical dosing will be in place for approximately 6 weeks after the cut is scheduled to finish, with the possibility of additional dosing after this depending on scheme performance. With the chemical dosing in place and the pumping out of the SDB stopped, they do not anticipate any performance issues with the scheme during the cut and for a period after the cut as well.

No further correspondence was exchanged regarding this issue. Please see the actions for completion and confirmation below.

Breaches of permit condition(s)

Below are the permit breaches that were identified during the site inspection.

1. CATEGORY C3 BREACH – PERMIT CONDITION 7 (Composition).

The discharge shall not contain more than 3 milligrams per litre of total Iron.

The permitted limit set for Fe is 3mg/l. The measured concentration of Fe on the

06/11/2025 was 4.16mg/L, breaching the consented limit. As this is a repeat offence I have also issued a warning to reflect this breach.

Please note, there is a discrepancy limit where a breach of condition 7 may be scored as a C4 Breach (A non-compliance which has no potential environmental effect) if the breach of consented limits is less than 10%. As a result, this breach has been categorised as C3 (A non-compliance which could have a minor environmental effect).

Action required

1. Implement mitigation strategies to reduce the total Fe concentration in the final discharge and bring it back into compliance.

Deadline: 25/12/2025

2. Continue monitoring discharge composition on a twice weekly basis until consent levels have been achieved and are stable.

Deadline: As needed. An administrative date of 25/01/2025 has been set.

3. Inform NRW of when the discharge has returned to consented levels.

Deadline: When applicable. An administrative date of 25/01/2025 has been set.

4. Cease all non-permitted works at Six Bells MWTS. Any change in operations will require a permit variation to legally undertake.

Deadline: Non-specific/continual. An administrative date of 25/01/2025 has been set.

5. Inform NRW once the reed cut and hydrogen peroxide dosing is complete on site.

Deadline: When applicable, once works are completed. An administrative date of 25/01/2025 has been set.

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. Please contact me if any changes to operations at Six Bells MWTS are proposed and we can discuss the variation requirements associated with these changes.

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, 03000654651/07904606156.

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.