

## Compliance Assessment Report CAR\_NRW0050651

**Permit being assessed:** CM0022201

**For:** Pandy Wastewater Treatment Works, **held by:** DWR CYMRU CYFYNGEDIG

**At:** Track off B4500, Pandy, Llangollen, Wrexham, LL20 7NT.

**Type of assessment carried out:** Check Monitoring/Sampling,

**Reason:** Routine.

**On** 05/01/2026.

**Parts of permit assessed:** Emissions

**NRW Lead Officer:** Callum Brannan.

**Report sent to:** CARS Mailbox, CARS Mailbox, on 23/02/2026.

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

Part of permitted activity assessed (criteria)	Assessment result	Non-compliant permit condition
WQ-C1 - Water Quality - Emissions and monitoring - Emissions to water	Assessed (A)	
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Result types are explained in more detail in the 'Important Information' section below.

### 2. What action is required?

No action required.

### 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

On the 12th of January 2026, Dwr Cymru notified Natural Resources Wales of a permit exceedance

at Pandy Wastewater Treatment Works. Relating to suspended solids being recorded at 70mg/l against the regulations limit of 60mg/l on the 5<sup>th</sup> of January 2026.

On the 13<sup>th</sup> of January 2026, Dwr Cymru notified Natural Resources Wales of another permit exceedance at Pandy Wastewater Treatment Works. Relating to BOD being recorded at >146mg/l against the regulations limit of 40mg/l, also on the 5<sup>th</sup> of January 2026.

NRW have received an Exceptional Circumstances Report relating to the exceedances recorded on the 5<sup>th</sup> of January. The report makes use of the following waiver in line with Regulation 3.1.3 of the permit:

3.1.3 (a) For the emission limits in schedule 3 table S3.1 to which this condition applies, no sample of the discharge taken at a time when unusual weather conditions are adversely affecting the operation of the waste water treatment works, shall be taken into account in deciding whether or not the emission limit has been complied with.

(b) On any occasion where unusual weather conditions adversely affect the operation of the waste water treatment works, the operator shall use its best endeavours to mitigate that adverse effect.

(c) For any sample of the discharge taken to be considered for the purposes of (a) above, the operator shall notify Natural Resources Wales in writing within 14 days of becoming aware that an emission limit has been exceeded. That notification shall include a full description of the unusual weather conditions and their impact on the operation of the works.

**1. Unusual weather: failure when weather conditions have adversely affected the operation of the waste water treatment works.**

**For example low ambient temperature, freezing of equipment, snow deposits, tidal or river flooding, failures of the electricity distribution system and/or weather related damage caused to equipment.**

DCWW further explained that “on the 5th January, there were widespread snow and ice warnings across north Wales. Wrexham County Borough Council had a yellow warning in place for snow and ice, which included the Ceiriog Valley, where Pandy WwTW is situated. This led to widespread travel issues, especially down the Ceiriog Valley, where snow was heavy, up to 8 inches in places. The B4500, the main road down the Ceiriog Valley was covered in snow and ice, which meant that the operator was struggling to get to all the sites in the Ceiriog valley on the 5th January.

The OSM sampler had walked to site at around 12:55 on January 5th, as it would have been impossible to drive to the site from the main road. By the time the escalation had come through to operators later in the afternoon, it had begun to snow again, and it was decided that it was not safe to go to site until the next day, due to snow and ice, and limited daylight hours left in the day.

Early the next morning two operators visited site by walking from the main road, as the snow and ice meant that they could not access by vehicle. When they arrived on site, they found that the site was covered in thick snow, and that the trickling biofilter arms had been stopped due to the amount of snow on the arms. They also found the surface of the biofilter covered in thick snow, as well as

the settlement tanks and the sampling point hatch. A video of the filter being stationary due to the snow has been attached to the submission.



The filter arms being stopped as shown above due to the snow will have caused the biofilter to scour the solids within the filter causing the elevated OSM TSS/BOD result and would also have massively impeded the biological treatment through the biofilter. The operator cleared the snow off the filter arms, which allowed the arms to then turn freely as designed, and the sample immediately started to improve.

The cold weather would have also impacted the biological treatment capacity, leading to an even higher BOD load in the scoured solids. The FE temperature when the OSM sampler took the sample was 4.4 0C. Cold temperatures are known to inhibit biological treatment, leading to a higher BOD result.

The operator returned to the site on 7th January, and the FE sample had returned to being well within consent, with the biofilter arms turning freely. Further evidencing that the failure would have been caused by the excessive snow stopping the biofilter arms.

Due to the heavy snowfall on site, during a yellow weather warning, causing the biofilter arms to stop rotating, and the excessively cold temperatures during the time of the failure inhibiting biological treatment, we are requesting that the TSS and BOD result from sample 8636437 are waived in this instance”.

NRW have reviewed the information provided and agree to accept the waiver.

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 required for the permit condition assessed to avoid non-compliance. No non-compliance scored at this time
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

**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 Monitoring
- WQ-C5 Installation of monitoring boreholes

**WQ D: Information**

- WQ-D1 Records
- WQ-D2 Reporting
- WQ-D3 Notifications

**Enforcement response**

Any non-compliance with a permit condition 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 twenty working days to let you know if we agree to your request.

**Disputing the Content of this Compliance Assessment Report Form**

If you disagree with the content of this Compliance Assessment Report form, you should submit your concerns, in writing, to the regulating officer who issued it within **15 working days** of its issue. This will be treated as a **Stage 1 review**.

If you are not satisfied with the outcome of the stage 1 review, you may request a **Stage 2 appeal**. This request must be submitted **within 21 working days** of receiving the response from the stage 1 review.

Further details on our review and appeal process are available at: [Natural Resources Wales / Appeal a regulatory decision from Natural Resources Wales](#)

**Concerns Not Related to the Content of this Compliance Assessment Report Form**

If your concerns do not relate to the content of the Compliance Assessment Report form, you should first attempt to resolve the issue with the regulating officer or their line manager.

If the issue remains unresolved, please contact our **Customer Contact Team**:

- **Telephone:** 0300 065 3000 (Monday to Friday, 09:00–17:00)
- **Email:** [enquiries@naturalresourceswales.gov.uk](mailto:enquiries@naturalresourceswales.gov.uk)

They will provide details on how to escalate your concerns through our **Complaints and Commendations procedure**.

If you are dissatisfied with our response, you may contact the **Public Services Ombudsman for Wales**:

- **Telephone:** 0300 790 0203
- **Email:** [ask@ombudsman.wales](mailto: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.