

## Compliance Assessment Report CAR\_NRW0051038

**Permit being assessed:** CB3194FL

**For:** Pontsticill Water Treatment Works, **held by:** DWR CYMRU CYFYNGEDIG

**At:** Dwr Cymru Cyfyngedig, Water Treatment Works, Pontsticill, Merthyr Tydfil, Merthyr Tydfil, CF48 2UP.

**Type of assessment carried out:** Site Inspection,

**Reason:** Routine.

**On** 11/03/2026, between 09:30 and 11:00.

**Parts of permit assessed:** All

**NRW Lead Officer:** Callum Murray.

**Report sent to:** CARS@dwrwymru.com, Mailbox, on 25/03/2026.

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

Part of permitted activity assessed (criteria)	Assessment result	Non-compliant permit condition
WQ-B3 - Water Quality - Operations - Operating techniques	C3 Minor	2.3.1 - For the activity referenced in schedule 1, table S1.1 the activity shall, subject to the conditions of this permit, be operated using the techniques and in the manner described in the documentation specified in schedule 1, table S1.2, unless otherwise agreed in writing by Natural Resources Wales.

Part of permitted activity assessed (criteria)	Assessment result	Non-compliant permit condition
WQ-B2 - Water Quality - Operations - The site	C3 Minor	2.2.1 The discharge activity shall take place at the discharge point marked on the site plan at schedule 7 to this permit, and as listed in table S3.2; and, the operating techniques that are the subject of conditions prefixed by 2.3 shall be applied at the location(s) shown, or otherwise described, in schedule 7.
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

Part of permitted activity assessed (criteria)	Assessment result	Non-compliant permit condition
		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.
WQ-B1 - Water Quality - Operations - Permitted activities	Assessed (A)	

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

## 2. What action is required?

Criteria	Action needed	Complete by
WQ-B3	Improve infrastructure to allow an automatic dosing of Sodium Thiosulphate during RTW events	30/09/2026
WQ-B2	This non-compliance will be sorted with the same actions as 2.3.1	30/09/2026
WQ-D2	Send summary report covering all run to waste activity permits, containing all parameters specified in table S3.1, including turbidity plus including results of investigations into the reasons for the discharge and proposed improvements	31/05/2026

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.

**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

**Pontsticill Site Report - CB3194FL**

On 11/03/26, Environment Officer Callum Murray carried out a compliance inspection of Pontsticill Water Treatment Works. The weather was mild and sunny and the works were fully operational during the visit. The purpose of the visit was to check compliance with the discharge permits AN0322601, AN0322801 and CB3194FL, and abstraction licence number 21/57/21/0002.

There were a number of Dwr Cymru staff present, including a Performance manager and process scientists.

This CAR is for the discharge from Emergency Run to Waste (RTW) permit number CB3194FL.

The RTW was not being used during the visit, but the outfall could be seen from the river bank. It was explained that there were issues with sampling from the outfall due to health and safety concerns when lone working or at night. The final chamber prior to discharge was being used for manual dosing of Sodium Thiosulphate, as opposed to the automatic dosing stated in the Pontsticill WTW Emergency Run to Waste test procedure submitted on 26/03/2021.

**Breaches of permit condition:**

2.3.1 - *For the activity referenced in schedule 1, table S1.1 the activity shall, subject to the conditions of this permit, be operated using the techniques and in the manner described in the documentation specified in schedule 1, table S1.2, unless otherwise agreed in writing by Natural Resources Wales.*

There is no record on the Permit file that NRW has agreed to different operating techniques to those specified in Pontsticill WTW Emergency Run to Waste test procedure submitted on 26/03/2021. The procedure details that '*The run to waste incorporates a new diversion post 2nd stage filters, a de-chlorination and sampling facility and discharge via an existing outfall to river. Sodium thiosulphate will be dosed automatically to the de-chlorination chamber to remove chlorine from the discharged water*'. This has been assigned a non-compliance category of C3. The permit was determined using the documents submitted, and any deviation from these documents needs to be assessed for risk. A non-automated approach is subject to human error and presence on site to carry out the alternative procedure.

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.*

This has been assigned a non-compliance category of C4. The permit states a

summary report covering all run to waste activity permits, containing all parameters specified in table S3.1 including turbidity plus including results of investigation into the reasons for the discharge and proposed improvements should be submitted annually. Reflection on past performance could lead to preventable issues being highlighted and rectified, reducing future RTW events.

### **Actions**

- Improve the RTW infrastructure to allow automatic dosing of Sodium Thiosulphate. Alternatively, apply for a permit variation so that the manual procedure can be properly assessed and conditioned - **by 30/09/2026**
- Send summary report covering all run to waste activity permits, containing all parameters specified in table S3.1, including turbidity plus including results of investigations into the reasons for the discharge and proposed improvements - **by 31/05/26**

### **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 email address:

[Callum.murray@cyfoethnaturiolcymru.gov.uk](mailto:Callum.murray@cyfoethnaturiolcymru.gov.uk)

[cwmtaf&bridgendconsultations@cyfoethnaturiolcymru.gov.uk](mailto:cwmtaf&bridgendconsultations@cyfoethnaturiolcymru.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 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.