

Compliance Assessment Report CAR_NRW0050025

Permit being assessed: BA2001101

For: Crynant Sewage Treatment Works, **held by:** DWR CYMRU CYFYNGEDIG

At: Track Off Neath Road (A4109), Crynant, Neath, SA10 8SG.

Type of assessment carried out: Site Inspection,

Reason: Incident Response (Incident number: 2502345).

On 05/03/2025, between 11:45 and 13:30.

Parts of permit assessed: 3.1

NRW Lead Officer: Chris Palmer, accompanied by: Edward Davies, Rhys Griffiths.

Report sent to: CARS Mailbox, CARS Mailbox, on 14/04/2026.

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	C3 Minor	3.2.1 - or the activity (A1), referenced in schedule 1, table S1.1, the operator shall take appropriate measures to minimise so far as reasonably practicable the polluting effects of the emissions of substances in the discharge not controlled by emission limits (excluding odour).

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	Undertake a root cause investigation into the exceedance(s) and take appropriate action where necessary to reduce risk of occurring again. Please report the findings of your investigation and list of actions taken	Already completed

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.

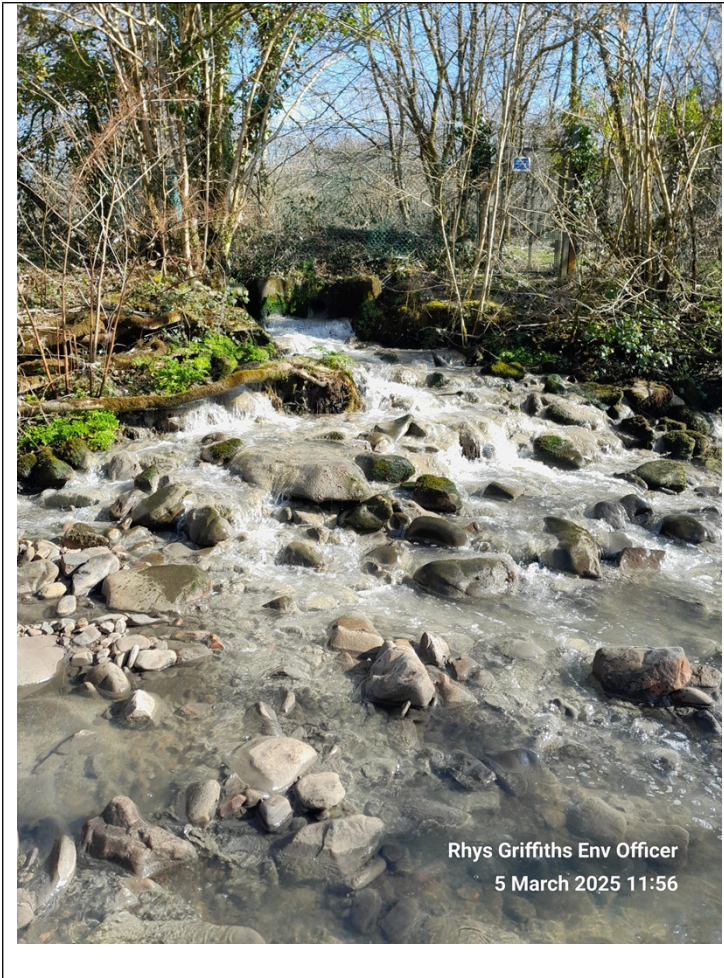
4. Details of our assessment

This report is issued in response to an incident on the 3 March 2025 - WIRS ref: 2502345

Permit Version in effect - 25/05/2023

On 5 March 2025, NRW officers attended Crynant Sewage Treatment works to inspect the storm outfall following a recent spill due to the failure of hire screens required for maintenance on the inlet screens (CAR_NRW0050020).

While on the river continued downstream to inspect the Final Effluent (FE) outlet. Upon inspection gross contamination of sewage fungus on the bed and a visible plume of discoloured FE for approximately 100 metres downstream (see pictures)





Formal samples were obtained and served on representatives of DCWW present on site and laboratory analysis results are below:

Det	Result (mg/l)	Max Limit (mg/l)
BOD	14.2	36
Ammonia	7.12	20
Sus Sol	15	44

It is noted that the FE did not breach its limit at the time of sampling. However, the presence of sewage fungus indicates organic enrichment of the receiving water due to emissions from the discharge, resulting in a minor adverse impact on local water quality and substrate habitat. DCWW has failed to adequately minimise the polluting effects of substances in the discharge not controlled by emission limits and is considered a breach of condition 3.2.1 of the permit.

NON-COMPLIANCE - CCS 3 - Condition 3.2.1 - *For the activity (A1), referenced in schedule 1, table S1.1, the operator shall take appropriate measures to minimise so far as reasonably practicable the polluting effects of the emissions of substances in the discharge not controlled by emission limits (excluding odour).*

Concurrently with this incident, scheduled OSM samples were taken of the FE on the 4 March, 18 March and 3 April. These were address in CAR forms **CAR_NRW0046665**, **CAR_NRW0046667** and **CAR_NRW0048262**.

The failures documented within these reports are intrinsically linked to the quality of the FE witnessed in this report. The following action was requested within each of the above reports and response received from DCWW is below:

Action 1: Undertake a root cause investigation into the exceedance(s) and take appropriate action where necessary to reduce risk of occurring again. Please report the findings of your investigation and list of actions taken.

The root cause investigation revealed that the primary issue was reactive equipment failure due to breakdowns and faults, with a secondary cause being inadequate design treatment. Specifically, there was a lack of biological treatment due to the failure of the biological process (RBCs) and insufficient treatment from mitigation equipment (SAF and HSAFs). The strong loading was attributed to the removal of infiltration, which increased the load on the site.

To address these issues, several actions were taken: reconfiguring SAF and HSAFs from six parallel streams to three series streams (with two completed and the third awaiting a level controller installation), managing improvements through a silver incident process, introducing corgin bugs to assist with nitrification of HSAF units, refurbishing RBC No. 4 with KEE and exploring opportunities to return other RBCs to service, optimizing PST desludge with the optimization team, and installing and commissioning Mecanna Units while demobilizing disc filters and reed beds. These measures aim to mitigate the identified root causes and reduce the risk of recurrence.

The actions detailed above are accepted as complete in relation to this incident.

END

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

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

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.