

Compliance Assessment Report CAR_NRW0052768

Permit being assessed: CM0082201

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

At: Factory Road, Queensferry, Flintshire, CH5 2QJ.

Type of assessment carried out: Check Monitoring/Sampling,

Reason: Incident Response (Incident number: 2608322).

On 29/07/2026 - 31/07/2026, between 13:00 and 15:00.

Parts of permit assessed: 2.1.1 and 2.3.3

NRW Lead Officer: Amy Chisnell.

Report sent to: CARS Mailbox, CARS Mailbox, on 26/08/2026.

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

Part of permitted activity assessed (criteria)	Assessment result	Non-compliant permit condition
WQ-B1 - Water Quality - Operations - Permitted activities	C1 Major	2.1.1 and 2.3.3
WQ-A1 - Water Quality - Management - General management	Action only (X)	
WQ-A1 - Water Quality - Management - General management	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-B1	Stop the discharge of centrate to the River Dee	Already completed
WQ-A1	Complete all actions specified within the Notice by the required deadlines.	23/09/2026
WQ-A1	Obtain the necessary environmental permit(s) to authorise the operation of the anaerobic digestion plant and all associated activities - NRW is aware that an application has already been submitted to our permitting team and is being reviewed.	30/10/2026

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.

We are currently considering taking enforcement action against you for the non-compliance recorded above. We will contact you in due course.

4. Details of our assessment

On 29 July 2026, NRW officers observed a black discharge emerging from the Dŵr Cymru Welsh Water (DCWW) Queensferry Wastewater Treatment Works (WwTW) outfall. Following this observation, Site Controllers were deployed to collect samples for analysis, and a POLFAX notification was issued to DCWW.

NRW officers collected samples from the outfall and from upstream and downstream locations. The sample taken directly from the Queensferry WwTW outfall at 13:50 contained visible solids which settled as a floc-like material when examined at the Buckley depot. At the time, the discharge was suspected to comprise process effluent, such as centrate, which was later confirmed by DCWW. Black discolouration was observed within the receiving watercourse downstream of the outfall as far as the blue bridge.

A DCWW Pollution Technician attended site on 29 July 2026 but inspected the final effluent sampling point rather than the outfall itself. DCWW subsequently reported that no issues had been identified and that the WwTW was operating within compliance. However, NRW observations and photographs indicated that black discolouration remained visible within the watercourse despite DCWW closing the POLFAX investigation.

NRW returned to the site on 30 July 2026 and confirmed that the pollution was ongoing, with further black discharges observed from the outfall. DCWW was informed and undertook further investigations, escalating the matter internally to their Catchment Manager.

On 3 August 2026, DCWW reported that investigations had identified a connection between site drainage associated with the centrifuge area and the storm line that joins the final effluent outfall downstream of the compliance sampling point. DCWW advised that intermittent washdown activities and a build-up of solids during prolonged dry weather was likely causing the discharge. As an immediate mitigation measure, DCWW closed the storm line penstock and ceased washdown activities pending further investigation.

A further update provided by DCWW on 6 August 2026 confirmed that the storm line penstock remained closed, arrangements had been made to clear the line, and operation of the centrifuge had ceased. DCWW advised that alternative treatment and sludge storage arrangements were in place and that a long-term solution for the site drainage system was being investigated. DCWW also confirmed that sufficient sludge storage capacity was available on site for approximately four weeks, removing the need to operate the centrifuges during this period.

An anti-pollution works notice was issued on the 12th August with the following actions and

deadlines:

- **STOP** any further discharge of centrate or any other material into the River Dee unless expressly permitted under Schedule 1 of Permit CM0082201 - by 14th August
- **REPAIR** the on-site drainage - by the 24th August
- **SURVEY** all drains and drainage systems on site, including the repair to ensure there are no further misconnections that could result in an unauthorised discharge to the environment - by the 9th September
- **PROVIDE** written confirmation of the survey findings and any remedial actions undertaken to Natural Resources Wales (NRW) - by 23rd September

DCWW confirmed that the black discharge originated from the Queensferry WwTW site drainage system associated with centrifuge operations. This resulted in visible pollution of the receiving watercourse over at least two consecutive days. Immediate mitigation measures have been implemented by DCWW whilst further remedial and long-term corrective actions are developed.

Environmental Permit CM0082201 authorises only the discharge of settled storm effluent and final treated effluent from the site. The discharge of centrate is not a permitted activity and therefore constitutes a breach of the Environmental Permitting (England and Wales) Regulations 2016 and the following permit conditions:

Condition 2.1.1 (Permitted Activities): *"The only activities authorised by the permit are the activities specified in Schedule 1, Table S1.1."*

Condition 2.3.3(a): *"The discharge specified in Schedule 3, Table S3.3b shall consist solely of secondary treated sewage effluent which has been disinfected by means of ultra violet (UV) radiation as specified in that table."*

A storyboard has been submitted by DCWW.

The storm line was cleared on 5 August 2026. Investigations into a long-term drainage solution for the site are ongoing, and DCWW has advised that mitigation measures will remain in place until the issue is resolved.

In the interim, the centrifuge drainage has been connected via pipework to the supernatant drainage system, which returns flows to the head of the works. As a result, DCWW has recommenced operation of the centrifuge and returned the storm penstock to automatic operation, preventing any further discharges of centrate.

NRW has established that the anaerobic digestion plant and its associated treatment and waste handling activities have been operated without the benefit of an environmental permit since installation. No environmental permit has been issued for these activities, despite them constituting regulated activities under the Environmental Permitting (England

and Wales) Regulations 2016. **NRW therefore considers that the operation of the anaerobic digestion plant and its associated activities without the required environmental permit constitutes an offence under Regulation 38(1)(a) of the Environmental Permitting (England and Wales) Regulations 2016**

NRW's investigations into the extent and duration of the unauthorised activities remain ongoing.

Required Actions

- Obtain the necessary environmental permit(s) to authorise the operation of the anaerobic digestion plant and all associated activities - *NRW is aware that an application has already been submitted to our permitting team and is being reviewed.*
- Complete all actions specified within the Notice by the required deadlines.

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.