

## Compliance Assessment Report CAR\_NRW0052777

**Permit being assessed:** BB3006701

**For:** Pen-y-Bont Wastewater Treatment Works, **held by:** DWR CYMRU CYFYNGEDIG

**At:** Portobello Bridge (Private Access), Ogmere-by-Sea, Bridgend, CF32 0QP.

**Type of assessment carried out:** Report/Data Review,

**Reason:** Incident Response (Incident number: 2603050).

**On** 25/08/2026.

**Parts of permit assessed:** 1.1

**NRW Lead Officer:** Ceri Malone.

**Report sent to:** CARS@dwrwymru, CARS mailbox, on 27/08/2026.

### 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 | C3 Minor          | 1.1.1 The operator shall manage and operate the activities: (a) in accordance with a written management system that identifies and minimises risks of pollution so far as is reasonably practicable, including those risks arising from operations, maintenance, accidents, incidents, non-conformances and those drawn to the attention of |

| Part of permitted activity assessed (criteria) | Assessment result | Non-compliant permit condition                                                                    |
|------------------------------------------------|-------------------|---------------------------------------------------------------------------------------------------|
|                                                |                   | the operator as a result of complaints; and (b) using sufficient competent persons and resources. |

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    | Investigate the root cause for sludge carryover and discharge instances. Put in place actions to address it | 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

### Incident Overview

On 27/03/2026 Dwr Cymru self-reported high suspended solids in the treatment process at Penybont WWTW causing blanket carry over on the final effluent tank. This caused high levels of suspended solids and COD in the final effluent. It is estimated that the final effluent quality was outside of permit conditions for 4-6 hours on the 27/03/2026.

Field sample results were taken by Dwr Cymru. Although not UKAS accredited results and therefore not considered a breach of permit independently they do indicate a high likelihood of sample exceedances. Photographs also indicate localised discolouration at the discharge point therefore a minor (Category 3) impact.

### 27/03/2026 Dwr Cymru Sample Results

| Sample Point | Time | Suspended Solids (mg/l) | COD (mg/l) | Ammonia (mg/l) | NTU |
|--------------|------|-------------------------|------------|----------------|-----|
|--------------|------|-------------------------|------------|----------------|-----|

|                |       |     |     |      |      |
|----------------|-------|-----|-----|------|------|
| FE Post UV     | 22:10 | 254 | 872 | 0.96 | 121  |
| Outfall        | 23:15 | 185 | 535 | 1.25 | 100  |
| 10m Downstream | 23:25 | 17  | 238 | 1.09 | 35.5 |
| 10m Upstream   | 23:20 | 7   | 204 | 0.14 | 6.35 |

A similar instance was experienced and self-reported by Dwr Cymru on 19/04/2026. It is estimated that final effluent quality was outside permit conditions for 6-7 hours on the 19th April from around 7:30pm-2:15am. Samples were taken on 20/04/2026.

| <b><u>20/04/2026 Dwr Cymru Sampling</u></b> |                  |                   |
|---------------------------------------------|------------------|-------------------|
| <b>Sample Point</b>                         | <b>Turbidity</b> | <b>NH3 (mg/l)</b> |
| FE Discharge                                | 5.56             | 1.1               |

On 21/04/2026 a duplicate Incident Action Plan (IAP) was submitted to NRW by Dwr Cymru - IAP/2026/BB3006701/Penybont WWTW/V1. As part of the IAP all self-reported incidents for with the same cause were duplicated to WIRS 2603050.

On 29/04/2026 Natural Resources Wales (NRW) were informed of slight discolouration, however limits were not exceeded. NRW visited the site on 30.04.2026 and sampled the final effluent quality at 14:25 (sample 260115701). All results from this sample were within permitted limits specified in 3.1 of the permit:

| <b><u>30/04/2026 NRW Sample Results</u></b> |                      |
|---------------------------------------------|----------------------|
| <b>Parameter</b>                            | <b>Sample Result</b> |
| BOD ATU                                     | <3mg/l               |
| COD as O2                                   | 33.3mg/l             |
| Ammonia(N)                                  | 1.78mg/l             |
| Suspended Solids @105°C                     | 7mg/l                |

The last incident recorded under the IAP was experienced on 18/05/2026. It is estimated on this occasion that final effluent quality was outside permit conditions for 1-2 hours - 0630-0830.

| <b><u>18/05/2026 Dwr Cymru Sample Results</u></b> |             |                              |                   |
|---------------------------------------------------|-------------|------------------------------|-------------------|
| <b>Sample Point</b>                               | <b>Time</b> | <b>HANNA Turbidity (FTU)</b> | <b>NH3 (mg/l)</b> |
| Final Effluent Discharge                          | 07:30       | 129                          | 2.43              |

The root cause determined by Dwr Cymru was excess solids within the system that could not be removed via normal maintenance due to settled sludge processing capacity. Additionally flow issues with control instruments causing hydraulic push through the site was also stated. As a result the following actions were specified in the IAP and subsequently completed by Dwr Cymru:

- Silver Incident declared on Pen Y Bont WwTW following the self reported pollution and

*subsequent sludge loop issues being experienced at site, and concerns at the AAD assets*

- *PLC modifications (level control and valve open position)*
- *Sludgetek mobilised on site*
- *Additional skips removed by DUO*
- *Purchasing of new level head for inlet*
- *Alfa Laval attending site to investigate process issues with centrifuges*
- *Liquid sludge removed from site via tankering operation*
- *Hybrid switchover to PST*

The following action has been paused as part of the final IAP. Amendments have been made and changes monitored while it is being proved:

- *PLC modifications (level control and valve open position)*

Improvements on both flow and sludge management as part of the IAP actions have resulted in no further instances since 18/05/2026.

**Breach of Permit Conditions:**

The discharge of sludge carryover is not permitted and therefore a breach of:

**1.1 General management**

**1.1.1 The operator shall manage and operate the activities:**

- (a) in accordance with a written management system that identifies and minimises risks of pollution so far as is reasonably practicable, including those risks arising from operations, maintenance, accidents, incidents, non-conformances and those drawn to the attention of the operator as a result of complaints; and*
- (b) using sufficient competent persons and resources.*

**Actions required:**

- Investigate the root cause for sludge carryover and discharge instances. Put in place actions to address it – Completed as part of IAP.

**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:

[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.