Compliance Assessment Report CAR_NRW0053286

Permit being assessed: AC0091401

For: CWMTILLERY STW, **held by:** DWR CYMRU CYFYNGEDIG

At: CWMTILLERY STW, UNKNOWN, UNKNOWN, UNKNOWN, UNKNOWN.

Type of assessment carried out: Site Inspection,

Reason: Routine.

On 14/10/2026, between 09:55 and 11:05.

Parts of permit assessed: Permit compliance

NRW Lead Officer: Elis Nuttall.

Report sent to: DCWW, Water Industry, on 21/10/2026.

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

Part of permitted activity assessed (criteria)	Assessment result	Non-compliant permit condition
WQ-B4 - Water Quality - Operations - Improvement programme	Action only (X)	
WQ-C1 - Water Quality - Emissions and monitoring - Emissions to water	C4 No impact	1(a) – Discharge Composition
WQ-A1 - Water Quality - Management - General management	C3 Minor	5a – Maintenance and Operation
WQ-A1 - Water Quality - Management - General management	C3 Minor	5b – Maintenance and Operation
WQ-A1 - Water Quality - Management - General management	C3 Minor	5c – Maintenance and Operation
WQ-B1 - Water Quality - Operations - Permitted activities	C3 Minor	7 – Sampling Point
WQ-C1 - Water Quality - Emissions and monitoring - Emissions to water	Action only (X)	
WQ-C1 - Water Quality - Emissions and monitoring - Emissions to water	Action only (X)	
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Part of permitted activity assessed (criteria)	Assessment result	Non-compliant permit condition
WQ-C1 - Water Quality - Emissions and monitoring - Emissions to water	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-B4	Undertake a full clearance and assessment of the STW to identify what actions are required to bring the system back into working and operational order. Long deadline, continued communication and justifications expected if an extension is required.	21/04/2027
WQ-C1	Complete all identified remedial works (as identified from the work required by Action 1 above) to bring the system back into working and operational order. Long deadline, continued communication and justifications expected if an extension is required.	10/10/2027
WQ-A1	Complete all required works as noted in Action 2.	21/10/2027
WQ-A1	Complete all required works as noted in Action 2.	21/10/2027
WQ-A1	Complete all required works as noted in Action 2.	21/10/2027
WQ-B1	Establish a safe and convenient access route to the discharge/sample point so that water quality samples can be collected as required. The sample point should be clearly signposted for the benefit of those requiring access. Long deadline, continued communication and justifications expected if an extension is required.	21/04/2027
WQ-C1	Confirm via tracing tests that the discharge point observed at SO2200706849 is the direct discharge of treated sewage effluent from the STW and not any other source. Long deadline, continued communication and justifications expected if an extension is required. Long deadline, continued communication and justifications expected if an extension is required.	21/04/2027
WQ-C1	Confirm via tracing test that the discharge consists solely of treated sewage effluent and no other inputs. Any water ingress or inputs from elsewhere shall be isolated and stopped from entering the STW. Long deadline, continued communication and justifications expected if an extension is required.	21/04/2027
WQ-C1	Confirm the volume of discharge complies with the limits set in condition 4 of the permit (5m3/d) and undertake actions to control volume if required to maintain compliance. Long deadline, continued communication and justifications expected if an extension is required.	21/04/2027

Criteria	Action needed	Complete by
WQ-C1	Once the STW has been restored to and effective operational condition, effective treatment shall be evidenced via water quality samples submitted to NRW. Deadline: 21/10/2027 – Long deadline, continued communication and justifications expected if an extension is required	21/10/2027

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

Site Inspection Report

This report details the site inspection made by Natural Resources Wales (NRW) on the 14/10/2026 to Cwmtillery Sewage Treatment Works, Cwmtillery, NP13 1LR, permit reference number EPR- AC0091401. This site is owned and operated by Dŵr Cymru Welsh Water (DCWW).

I (NRW Environment Officer Elis Nuttall) attended Cwmtillery Sewage Treatment Works at 09:55 for a water quality permit compliance inspection where I met with DCWW's Process Scientist (CE). The weather was overcast and mild at the time of the inspection.

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General Observations

This sewage treatment works (STW) services the DCWW operational buildings at Cwmtillery Reservoir. These premises include toilets, welfare facilities, office space and the operational equipment for the reservoir. The occupancy of the site is very low day to day.

The permit, originally issued in March 1974, consents the discharge solely of biologically treated sewage effluent via a STW to Afon Tillery at SO2202006900. An approved sampling point shall be maintained at the marked point on the site plan so that a representative sample can be taken from the STW safely and conveniently. General maintenance and management conditions are included.

The volume of discharge shall not exceed 5m^3/d. There are no numeric effluent composition limits conditioned, only descriptive which states that *The discharge shall not contain any poisonous, noxious or polluting matter or solid wate matter.*

The site was operational at the time of the inspection.

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Initial Discussion

This was the first ever compliance inspection undertaken for this asset by NRW or predecessor organisations. As such I began by establishing the operational and management history of the STW. CE was very candid when stating that other than the installation of the system at some point prior to 1974 (date of permit issue) that there was no operational or management records held by DCWW for the asset. There is also no management regime in place and no record of maintenance of any kind ever taking place. As stated by CE, the system for all intents and purposes has been abandoned, despite still servicing the foul sewage system on the reservoir site. It was also noted that the system discharge may be combined with the settlement lagoon discharge associated with the reservoir and water treatment works (WTW).

While this was very concerning, I agreed to assess what was in place and form a framework of actions in order to establish the condition of the STW and how to bring it back into full operation and compliance if required. We proceeded to inspect the site infrastructure.

Site Infrastructure

We began by accessing what was stated to be the discharge and sample point, potentially combined with the WTW discharge, which was located at ~SO2205406711. However, it was clear that this was the discharge and sample point for the WTW (as it was labelled as such with clear signage, Figure 1) and was not the STW discharge point. This was queried on site an on checking the attached site plan it was clear that while the location indicated this was a sampling point it was for the WTW as noted at the top of the site plan. This may have been included in this permit in error at some point while compiling and consolidating documents. I have added an action to rectify this below.

The listed discharge point for this permit was ~200m upstream from this point. As a result, we proceeded upstream to identify the correct discharge point.



Figure 1 – The discharge/sampling point for the WTW that was incorrectly identified as the discharge/sampling point for the STW as observed during the inspection.

After walking upstream for ~200m via a permissible pathway we observed a discharge point at SO2200706849 which CE stated was directly in line with where the system was located just up the banking. I was therefore happy to accept this as the discharge point for the STW, however an action to confirm this has been included. No further upstream

discharges were observed. The access to this point was difficult, having to navigate fallen trees and dense vegetation and as a result I have assessed this point as not safe, convenient, practically accessible or identifiable, contrary to condition 7 of the permit. This has been reflected in the breaches and action lists below.

The conditions of the discharge point and effluent water quality appeared good at the time of the inspection, with effluent clarity being very good, however there was a consistent and high volume of flow. When queried, CE stated that there may be other inputs from the WTW or other sources, and so actions to confirm sources and volumes have been added. There was no odour or fungus present and no apparent downstream impact, indicating no environmental damage. There was a secondary, larger diameter pipe present, but this was not discharging at the time of the inspection, with CE noting they weren't aware of what this pipe was supposed to be servicing, but it was potentially the WTW settlement lagoons. These observations can be seen in Figure 2.



Figure 2 – The discharge point, effluent quality and downstream impact as observed during the inspection.

While there was no observable impact present, my concerns regarding the lack of maintenance history led me to suggest sampling the effluent to assess the water quality. While CE was open to this, they suggested that WE use DCWW's in-situ sampling equipment to test several parameters as an indication of water quality. If there were subsequently any majorly concerning result then I could undertake the formal NRW sampling process. I agreed to this and a small amount of the discharge was collected for

later in-situ testing (discussed further below).

The area where the system was assumed to be located was in the vicinity of SO2198506860 as identified by CE. It was evident from initial observations that the location was heavily overgrown with all pieces of infrastructure covered in vegetation, with some showing signs of impact from tree growth and potential root ingress/damage. On querying whether DCWW held any plans, details or schematics for the system CE admitted that nothing was available and that not much is known about the setup beyond what can be observed from the surface. I stated immediately that major maintenance works would be required to clear the area to assess the condition of the system effectively, something that I could not do at the time of the inspection. CE stated that the STW consisted of an initial settlement tank (referenced as a septic tank) which captured the untreated solid waste and liquid effluent is passed forward to a biological filter bed via a tipper tray. We were unable to access the septic tank due to vegetation growth and an inability to lift the chamber covers as they were sealed with debris. On inspection, the tipper tray was inoperable with all effluent passing through bypassing it completely and not travelling down the dispersal channels. The entire system displayed heavy sedimentation with channels and the filter bed filled with debris. Overall, I concluded that the STW is non-operational and that serious remedial work is required to bring the system back online. I have listed several breaches and required actions below to reflect the observations made which are evidenced in Figure 3.











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.