

Compliance Assessment Report

Report ID:
CAR_NRW0035944

This form will report compliance with your permit as determined by an NRW officer

Site	ST BRIDES AND SEAWAY STW	Permit Ref	AN0024001			
Operator/Permit holder	DWR CYMRU CYFYNGEDIG					
Regime	WaterQuality					
Date of assessment	03/10/2019	Time in	10:00	Out	10:40	
Assessment type	Audit					
Parts of the permit assessed	All					
Lead officer's name	Falk, Tamarind					
Accompanied by	Burton, Luke,Jones, Emma					
Recipient's name/position	DCWW/OSM Mailbox/ DCWW/OSM Mailbox	Date issued	12/11/2019			

Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations or the licence under the Water Resources Act 1991 as amended by the Water Act 2003. A detailed explanation is captured in "Compliance Assessment Report Detail" (Section 2) and any actions you may need to take are given in the "Action(s)" (section 4). This summary details where we believe any non-compliance with the permit has occurred, the relevant condition and how the non-compliance has been categorised using our Compliance Classification Scheme (CCS). CCS Scores can be consolidated or suspended where appropriate, to reflect the impact of some non-compliances more accurately. For more details of our CCS scheme, contact your local office.

Permit conditions and compliance summary	CCS Category	Condition(s) breached
A1 - Specified by permit	C3	3.1.1
	C3	2.2.1
C1 - General Management - Staff competency/training	C3	1.1.1
C2 - General Management - Management system and operating procedures	X	

KEY: See Section 5 for breach categories, suspended scores will be indicated as such.

A = Assessed or assessed in part (no evidence of non-compliance), **X** = Action only,
O = Ongoing non-compliance, not scored.

Number of breaches recorded	3	Total compliance score (see section 5 for scoring scheme)	12
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If the Number of breaches recorded is greater than zero, please see Section 3 for our proposed enforcement response

Section 2 – Compliance Assessment Report Detail

This section contains a report of our findings and will usually include information on:

- The part(s) of the permit that were assessed (eg. Maintenance, training, combustion plant, etc)
- Where the type of assessment was 'Data Review' details of the report/results triggering the assessment
- Any non-compliances identified
- Any non-compliances with directly applicable legislation
- Details of any multiple non-compliances
- Information on the compliance score accrued inc.
- Details of advice given
- Any other areas of concern
- Any actions requested
- Any examples of good practice
- A reference to photos taken

Overview

Planned inspection undertaken by Tamarind Falk in the presence of Emma Jones (NRW), Luke Burton (NRW), Richard Ingles (DCWW) and Gemma Cavill (DCWW). This is a small sewage treatment works (STW) serving Lighthouse Caravan Park, St Brides. The STW is located within the Caravan Park.

During the inspection the weather was overcast but not raining. There had been high levels of rainfall across South Wales in the week leading up to the inspection.

The site is served by two pumping stations. No trade effluent is received. Confirmation of the current population served by the works, the current Dry Weather Flow (DWF) calculation and a current catchment map was provided following the inspection (hence delay in issuing this CAR form). Population confirmed as 418 and DWF as 75.24 m³/d. This is over the limit specified in Schedule 3, Table 1 of the permit and above the threshold for a 'descriptive' permit. This was raised at the 2015 inspection but has not been addressed.

Written Management System

A copy of the written management system was not available on site but is held at DCWW office and said to be available to relevant staff. A copy was sent following the inspection: 'WO (3) 31 - General Management of WwTW with Descriptive Permits.

The management system will need to be changed in line with the permit variation from Descriptive to Numeric.

STW process

There is no **primary settlement tank**, screening/filtration or storm tank. Sewage effluent enters through a balance tank in the **inlet**, over a weir to an oxidation ditch/activation lagoon. Retention time in the **activation lagoon** is estimated to be approximately 10 hours.



Photo 1: Activation lagoon

Settlement then occurs in a **secondary tank** from which a proportion of sludge is recirculated to the activation lagoon. The remaining sludge is removed from site and taken to DCWW's Nash WWTW. (Waste transfer notes are not required due to internal transfer between DCWW sites).



Photo 2: Secondary tank

There was some sanitary waste on the ground behind the secondary tank.

Action: Please offer an explanation as to why this may have occurred.



Photo 3: Debris by Secondary tank

The treated effluent running from the settlement tank through a concrete channel was running clear at the time of inspection. The **Sample Point** next to the channel was clear and easily accessible.



Photo 4: Channel and Sample point

The permit states that both the Sample Point and Discharge Point are at NGR ST 29840 81476. However, the treated effluent discharges elsewhere into the Severn Estuary. It is not possible to see the exact **discharge point**. There is a manholed chamber just before where the discharge point is believed to be. There was no noticeable odour or debris around the area where the discharge takes place.



Photo 5: Manhole near Discharge point

Maintenance and Records

The site is visited weekly and all aspects visually inspected. The weekly records of maintenance and parameter checks were seen and were satisfactory.

WCDMS
St Brides WwTW Critical Parameter Table

Assess No. 01000

E.A. CONSENTS

Descriptive

WARNINGS	ACTIONS
TURBIDITY 20 jtu	CHECK WORKS
TURBIDITY > 50 jtu	SEEK HELP
AMMONIA 10 mg/l	CHECK WORKS
AMMONIA 20 mg/l	SEEK HELP
SOLIDS 80 mg/l	CHECK WORKS
SOLIDS 100 mg/l	SEEK HELP

27 May 2016

Photo 6: Parameter checks

DATE: 28/4/19

SECTION 1: To be completed by the Process Operator

Name (please print): **Tom Bailey** Date this version completed: **ASPO** Signature (please print): **Tom Bailey**

Check (S) Yes (N) No

Compliance:

Check Water Leak Reached ☒ YES ☐ NO

Check Water Leak Reached ☒ YES ☐ NO

Check Water Leak Reached ☒ YES ☐ NO

Check Water Leak Reached ☒ YES ☐ NO

Flow:

Inlet Works ☒ YES ☐ NO

Tramples Point ☒ YES ☐ NO

Effluent Influent ☒ YES ☐ NO

Storm Tanks:

Storm tank status ☒ YES ☐ NO

Other

Is flow diverting to storm before PST achieved? ☒ YES ☐ NO

Are all on site - have all results been updated since last site visit? ☒ YES ☐ NO

Cost action on site ☒ YES ☐ NO

Is all key plant and equipment on line and operational? ☒ YES ☐ NO

SECTION 2: To be used by Process Operators, Process Technicians, Process Support, MEL, O&M, Safety Officers, contractors and all visitors, contractors and visitors. Ensure that you enter your full name, the time that you arrived and departed from site. Include the reason for your visit and any actions that you have taken. Process Operators, Process Technicians, Process Support and MEL to use this section to record any investigation and escalation actions. Also, ensure that any actions given by Process Tech or Process Support is included, NRS to record any faults, incidents and breakdowns.

Generated by T. Jones

CUSTOMER COMPLAINT Siphons blocked CARRIED BLOCKAGE

SITE All OK.

Simon Randall

I HILL FOR AND SEE ALES PLEASE.

Simon Randall

Photos 7-8: Maintenance record example

Actions: Please see Section 4.

Contact details: If you have any queries regarding this CAR form or to provide an update on any actions above, please contact Tamarind Falk, Environment Officer, <amarind.falk@naturalresourceswales.gov.uk>, 03000 654973

EPR Compliance Assessment Report

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Site	ST BRIDES AND SEAWAY STW	Permit Ref	AN0024001
Operator/Permit holder	DWR CYMRU CYFYNGEDIG	Date	03/10/2019

Section 3 – Enforcement Response

You must take immediate action to rectify any non-compliance and prevent repetition. Non-compliance with your permit conditions constitutes an offence and can result in criminal prosecutions and/or suspension or revocation of a permit. Please read the detailed assessment in Section 2 and the steps you need to take in Section 4 below.

In respect of the above non-compliance you have been issued with a warning. At present we do not intend to take further enforcement action. This does not preclude us from taking additional enforcement action if further relevant information comes to light or offences continue.

Section 4 – Action(s)

This section summarises the actions identified during the assessment along with the timescales for when they will need to be completed.

Criteria Ref.	CCS Category	Action required/advised	Due Date
See Section 1 above			
A1	C3	Variation of permit to reflect the higher DWF. Please refer to NRW website: https://naturalresourceswales.gov.uk/permits-and-permissions/water-discharges-and-septic-tanks/discharges-to-surface-water-and-groundwater/change-vary-an-existing-permit	13/01/2020
A1	C3	Submit correct information in permit variation application.	13/01/2020
C1	C3	Improve the management system/staff training as required.	13/01/2020
C2	X	Please offer an explanation re. the sanitary waste debris seen on the ground behind the secondary tank.	13/01/2020

Section 5 – Compliance notes for the Operator

To ensure you correct actual or potential non-compliance we may

- Advise on corrective actions verbally or in writing
- Require you to take specific actions verbally or in writing
- Issue a notice
- Require you to review your procedures or management system
- Change some of the conditions of your permit
- Decide to undertake a full review of your permit

Any breach of a permit condition is an offence and we may take legal action against you

- We will normally provide advice and guidance to assist you to come back into compliance either after an offence is committed or where we consider that an offence is likely to be committed. This is without prejudice to any other enforcement response that we consider may be required.
- Enforcement action can include the issue of a formal caution, prosecution, the service of a notice and/or suspension or revocation of the permit.

See our Enforcement and Civil Sanctions guidance for further information

This report does not relieve the site operator of the responsibility to

- Ensure you comply with the conditions of the permit at all times and prevent pollution of the environment
- Ensure you comply with other legislative provisions which may apply

Non-compliance scores and categories

CCS category	Description	Score
C1	A non-compliance that could have a major environmental effect	60
C2	A non-compliance which could have a significant environmental effect	31
C3	A non-compliance which could have a minor environmental effect	4
C4	A non-compliance which has no potential environmental effect	0.1

Operational Risk Appraisal (Opra) - Compliance assessment findings may affect your Opra score and/or your charges. This score influences the resource we use to assess permit compliance.

Section 6 – General information

Data protection notice

The information on this form will be processed by the Natural Resources Wales (NRW) to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s). The NRW may also use and/or disclose it in connection with:

- Offering/providing you with its literature/services relating to environmental matters
- Consulting with the public, public bodies and other organisations (eg. 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 its service
- Freedom of Information Act/Environmental Regulations request

The NRW may pass it on to its agents/representatives to do these things on its behalf. You should ensure that any persons named on this form are informed of the contents of this data protection notice.

Disclosure of information

The NRW will provide a copy of this report to the public register(s). However, if you consider that any information contained in this report should not be released to the public register(s) on the grounds of commercial confidentiality, you must write to your local area office within fifteen working days of receipt of this form indicating which information it concerns and why it should not be released, giving your reasons in full.

Customer charter

What can I do if I disagree with this compliance assessment report?

If you are unable to resolve the issue with your site officer, you should firstly discuss the matter with officer's line managers using the informal appeals procedure. If you wish to raise your dispute further through our official Complaints and Commendations procedure, phone our general enquiry number 0300 065 3000 (Mon to Fri 08.00 – 18.00) and ask for the Customer Contact team or send an email to enquiries@naturalresourceswales.gov.uk. If you are still dissatisfied you can make a complaint to the Public Services Ombudsman for Wales. For advice on how to complain to the Ombudsman phone their helpline on 0845 607 0987.

Welsh Language

If you would like this form in Welsh please contact your Regulatory Officer.