

Compliance Assessment Report

Report ID:
CAR_NRW0035776

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

Site	MAN-MOEL WASTEWATER TREATMENT WORKS	Permit Ref	AA0012101			
Operator/Permit holder	DWR CYMRU CYFYNGEDIG					
Regime	WaterQuality					
Date of assessment	03/10/2019	Time in	11:30	Out	11:45	
Assessment type	Unknown					
Parts of the permit assessed	All					
Lead officer's name	Burton, Luke					
Accompanied by	Jones, Emma,Falk, Tamarind					
Recipient's name/position	DCWW/ OSM Mailbox	Date issued	04/10/2019			

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
B1 - Infrastructure - Engineering for prevention and control of emissions	X	
	X	
B4 - Infrastructure - Containment of stored materials	X	
C2 - General Management - Management system and operating procedures	X	
E2 - Emissions - Land and groundwater	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	0	Total compliance score (see section 5 for scoring scheme)	0
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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

Inspection undertaken by Luke Burton, in the presence of Emma Jones and Tamarind Falk.

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.

Manmoel STW is a small works serving a population equivalent of below 250 people. The works accepts no trade effluent. The works features an inlet, primary tank, trickling filter bed (with distributor feed tipper trough), and filter effluent viewing chamber. The permit application states that the site features a humus tank. Treated effluent is discharged to ground. The permit application states that the works uses a stone filled soakaway pit and herringbone soakaway.

Inlet and Primary Tanks - Solids are tankered away monthly and taken to a DCWW Cardiff works. No evidence of tankering spillages or surcharging inlet manhole.

Trickling filter bed - High influent flows were causing the distributor feed tipper trough to remain in the 'tipped' position, allowing influent to flow continually into the influent distributor. The rotating influent distributor was rotating freely. Orifices and splash plates were free of debris. Air vents were present and free from surface blockages. Influent was being distributed evenly across the synthetic media surface. Some evidence of solids (sanitary towels) on media surface.

Final settlement - The permit application refers to a humus tank. However, this was not observed on site or referenced by the operatives on site.

Filter effluent viewing chamber - The filter effluent / treated effluent appeared clear with no visual evidence of suspended solids, oil or grease.

Soakaway system - The soakaway system could not be observed as it is overgrown with vegetation. The permit application refers to a stone filled soakaway pit (6ft x 6ft x 5ft) and then to a herringbone soakaway.

Flow measurement - No flow measurement present.

Alarms and power units - Neither present.

Odour - No significant odours present at time of visit around the inlet, primary tank and trickling filter bed. Soakaway system not accessible, but no odour detected from approximately 10 meters away from understood location.

Maintenance - The site undergoes annual mechanical maintenance has a weekly visit from DCWW operational staff. During the weekly visit all aspects are visually inspected. The rotating influent distributor orifices, splash plates and media are cleared of debris.

Actions:

1. As per condition 1.1.1 (a) the activity shall be managed in accordance with a written management

system. No system was provided on site. A copy of the management system must be provided.

2. Confirm that the high influent flows are not compromising the ability of the works to meet its permit conditions.
3. Attempt to stop solids such as sanitary wastes entering the works or passing through from the primary tank onto the filter bed.
4. Confirm if the works features a humus tank and if so its location and operation (maintenance etc.).
5. Locate the soakaway system and manage vegetation so to allow access to it.

EPR Compliance Assessment Report

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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.

Other than the provision of advice and guidance, at present we do not intend to take further enforcement action in respect of the non-compliance identified above. This does not preclude us from taking enforcement action if further relevant information comes to light or advice isn't followed.

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			
E2	X	5. Locate the soakaway system and manage vegetation so to allow access to it.	01/11/2019
B1	X	4. Confirm if the works features a humus tank and if so its location and operation (maintenance etc.).	11/10/2019
B4	X	3. Attempt to stop solids such as sanitary wastes entering the works or passing through from the primary tank onto the filter bed.	18/10/2019
B1	X	2. Confirm that the high influent flows are not compromising the ability of the works to meet its permit conditions.	18/10/2019
C2	X	1. As per condition 1.1.1 (a) the activity shall be managed in accordance with a written management system. No system was provided on site. A copy of the management system must be provided.	11/10/2019

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.