

Compliance Assessment Report

Report ID:
CAR_NRW0031674

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

Site	EITHINFYNYDD WTW TALYBONT NR B	Permit Ref	CG0133101
Operator/Permit holder	DWR CYMRU CYFYNGEDIG		
Regime	WaterQuality		
Date of assessment	10/03/2017	Time in	N/A
Assessment type	Site Inspection	Out	N/A
Parts of the permit assessed	As below.		
Lead officer's name	Williams, Leon		
Accompanied by			
Recipient's name/position	Jonathan Cannon/ Process Science Manager	Date issued	30/05/2017

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	A	
E3 - Emissions - Surface water	C4	Table S3.1a
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	1	Total compliance score (see section 5 for scoring scheme)	0.1
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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

Eithinfynydd WTW (CG 0133101) has a consented combined analyser waste stream discharge of pH 6 to 9. At 12:40 hours on the 10 March 2017 this discharge consent was breached by a reading measuring pH 5.7.

4 May 2017

Natural Resources Wales (NRW) issued a request for a written explanation for the failure.

23 May 2017

Written explanation received from DCWW stating:

“The consented discharge from Eithinfynydd water treatment works (WTW) consists of analyser waste, which gravitates to the OSM sample point. The discharge is dechlorinated by the addition of declor tablets and these also act to increase the pH above the lower discharge limit.

A separate consent contains provisions for the discharge of rinse water from freshly delivered GAC media. This discharge only occurs infrequently. There are 4 GAC filters, we are due to replace the media in one of those filters this year. Following that we will change the media in one filter at a time every 18 months. The rinse water from the freshly generated GAC will be discharged every 18 months until the filter is ready to go back online.

Apart from this, the site is designed as a “dry site” with no discharge to the environment as the wash water from the rapid gravity filters (RGF) and GAC Filters discharges to a backwash storage tank from where it is pumped to a sludge thickener. The supernatant from the sludge thickener flows to a supernatant storage tank, the outlet of which is monitored for turbidity, and the supernatant is recycled to the inlet of the water treatment works.

Prior to 10th March 2017, there were several unbuffered raw water monitors which monitor the natural water abstracted from Llyn Bodlyn – contributing to the discharge sampled at the OSM monitoring point. The pH of the natural lake water, discharging to its local water course, is usually below pH 6 in the spring.

We have now diverted the water coming out of the raw water monitors to the supernatant tank and so this naturally low pH lake water is now recirculated to be treated in the water treatment works.

In the last two weeks, we have enhanced our pH correction facilities by installing a small sodium carbonate dosing unit”.

A CCS Category 4 breach has been recorded against permit condition S3.1a in response to this non-compliance.

This failure was caused by raw water from Llyn Bodlyn that was discharged. The raw water typically has a pH lower than 6 and will have reduced the pH in the analyser waste discharge

which will be of minimal volumes analysed and discharged routinely.

The waste raw water from the analysers has now been diverted back into the works so it will not be discharged in the future. The pH correction facilities on site have also been enhanced.

NRW are satisfied with the steps taken to rectify this non-compliance. No further enforcement action is to follow.

In this document 'Natural Resources Wales' means the Natural Resources Body for Wales established by Article 3 of the Natural Resources Body for Wales (Establishment) Order 2012'.

EPR Compliance Assessment Report

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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			
E3	C4	Waste raw water diverted from analysers back into works. pH correction facility has also been enhanced.	30/05/2017

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.