

Compliance Assessment Report

Report ID:
CAR_NRW0035230

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

| | | | | | | |
|------------------------------|---|-------------|------------|-----|-------|--|
| Site | TYWYN STW MORFA GWYLLT TYWYN | Permit Ref | CG0351401 | | | |
| Operator/Permit holder | DWR CYMRU CYFYNGEDIG | | | | | |
| Regime | WaterQuality | | | | | |
| Date of assessment | 10/06/2019 | Time in | 12:30 | Out | 13:30 | |
| Assessment type | Site Inspection | | | | | |
| Parts of the permit assessed | all | | | | | |
| Lead officer's name | Thomas, Llyr | | | | | |
| Accompanied by | | | | | | |
| Recipient's name/position | Dwr Cymru Welsh Water/ Dwr Cymru Welsh Water | Date issued | 11/06/2019 | | | |

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 |
|--|-----------------|--------------------------|
| 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 |
|------------------------------------|----------|---|----------|

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

On the 10th of June 2019, Environment Officer Llyr Thomas undertook a site inspection of Dwr Cymru's (DCWW) asset, Tywyn Sewage Treatment Works (STW). This was done to eliminate Tywyn STW as a possible source of bacteria to Tywyn's bathing water. In 2018, Tywyn lost its blue flag status as the water quality classification of the beach shifted from excellent to good.

Natural Resources Wales is undergoing investigation to identify and remedy the source of the increases bacterial loading and would like to thank DCWW for accomodating the inspection to continue this work.

In general, the site was well maintained and there were no non-compliances recorded.

Tywyn's sewage treatment works has been operational since 1995 and manages both the Tywyn and Aberdyfi's sewage and storm water supply. The treatment at the works include settlement, biological, and UV radiation.

Initial screens that capture unwanted debris were in good condition.

It is a highly engineered site with efficient capacity for the area it serves. DCWW have a permit to storm discharge (CG0351402) but have good capacity to manage rain events without discharging storm. For example, the storm tanks were full on Friday evening the 7th of June, but were completely empty and dry during my inspection.

DCWW have a holding tank of final effluent which they use to wash down the tanks and any other parts of the site that need cleaning which is then returned to the start of the works.

They have 2 sludge containers which gets transported off site for further treatment.

Due to the coastal conditions, parts of the works are replaced as and when are required because even the steel rusts over time. An example of this are the 4-rotating arm biological filters. During my inspection, some of the arms appeared a little rusty and they are replaced when they cease to function. However, the inflow of the works is 58 l/s and each biological filter has a capacity of 32 l/s therefore the works can cope with shutting one system down to carry out repairs, as they have a combined capacity of 128 l/s.

DCWW have an additional emergency discharge consent if the works should become overloaded with heavy rainfall. This means they can pump untreated final effluent back to the mains holding chamber to backfill the foul lines for extra storm storage should they require it. However, this consent has never been used (CG351403).

The initial pump from the first holding tank of the feed into the works is regulated using an automated system. This system increases or decrease the flow rate of the effluent into the works and can pump a maximum of 340 l/s. The system currently works on a step system but as of the 8th of July 2019, the system is being upgraded and will run more efficiently allowing a more linear increase or decrease of flow volumes depending on the works initial feed volume.

The site's final effluent is sampled once a month with no recorded non-compliance in the past 3 years.

Tywyn's STW's outfall is 2km out at sea and submerged.

The site records telemetry and each system are alarmed with 24/7 standby operatives should any on site failures occur.

Their UV system is online during the official bathing season, where they are required to be running at 32mJ/cm². DCWW stated that on average the run between 100-150 mJ/cm².

In conclusion, Tywyn's STW is unlikely to be the source of increased bacterial loading of Tywyn's bathing water beach, as DCWW have engineered and maintained the site to ensure they are well within compliance of their permit. The site is also highly resilient to any volatile changes such as mechanical failure or heavy rains.

ACTION.

Ensure continued upkeep of the installation.

EPR Compliance Assessment Report

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| | | | |
|------------------------|---------------------------------|------------|------------|
| Site | TYWYN STW MORFA GWYLLT TYWYN | Permit Ref | CG0351401 |
| Operator/Permit holder | DWR CYMRU CYFYNGEDIG | Date | 10/06/2019 |

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 | | | |

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.