

## Compliance Assessment Report

**Report ID:**  
**CAR\_NRW0035317**

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

Site	LLANFOR STW FINAL EFFLUENT	Permit Ref	CM0160701
Operator/Permit holder	DWR CYMRU CYFYNGEDIG		
Regime	WaterQuality		
Date of assessment	04/06/2019	Time in	11:00
Assessment type	Site Inspection	Out	12:00
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	28/06/2019

### 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
A1 - Specified by permit	C3	3.ii. the treated effluent from having any adverse visual and other environmental impact (to the receiving waters)
	C3	3.i. Any matters being present in the effluent which will cause the receiving water to be poisonous or injurious to fish or to their spawn or spawning grounds or food or otherwise cause damage to the ecology of the receiving waters.

**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.

<b>Number of breaches recorded</b>	<b>2</b>	<b>Total compliance score</b> (see section 5 for scoring scheme)	<b>8</b>
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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

On the 4th of June at 11:00, Llyr Thomas of Natural Resources Wales met Andrew Garner, Rosanna Edwards and James Bauld of Dwr Cymru at Llanfor Sewage Treatment Works (permit no: CM0160701/2). NRW have received incident reports describing sewage related pollution on the bankside of the river Dee. The origin of the pollution is believed to be from Llanfor's Sewage Treatment Works hence an inspection was undertaken, and the suspicion was validated.

The works at Llanfor serves a relatively small populace of the village of Llanfor, a maximum of 240 people, and no trade effluent. It consists of an aerated treatment system followed by two settling chambers and a final effluent holding tank. The final effluent holding tank pumps the water to the outfall beside the Dee once the tank reaches a certain volume, using an automated system. This has been engineered to ensure that there is enough potential energy in the system to flush the water through the final outlet. The outlet is approximately 300-400m due east from the works.

The effluent from the start of the works, to the end of the works and at the final outlet was grey in colour. As expected there was a sewage smell at the works, but that smell was also persistent at the discharge point by the outlet.

The river Dee has meandered from the outlet in recent years which has exposed the outlet. This means that DCWW now discharge to the ground beside the river Dee, where the final effluent stagnates and turns septic, rather than discharging directly to the river Dee where dilution would have ensured there was no visual impact to the Dee from the works. The effluent that discharges to ground beside the river Dee is grey in colour, smells of sewage and there is also sewage fungus present. There are some nitrophilous plant species present such as docks and nettles. The effluent seeps into the Dee where there is some visual impact on the Dee for approximately 6-10m on the river left bankside. Note, prior to a POLFAX from NRW, the outfall would pool and not flow into the Dee. It is only since an engineer has gone to the bank side of the river and formed a small opening with a shovel for the effluent to flow does it drain to the Dee.

The discharge point is at SH9434136559 where Anglers use the area to fish from.

The discharge permit that DCWW have is a descriptive discharge and they may not visually impact the river Dee as per condition 3. ii. This condition is not being met and the site is currently non-compliant (see pictures).

The river Dee is an important drinking water source. However, its abstraction point is many kilometres downstream and this sewage work in terms of dilution is very minor. The water companies can cope with the bacterial load from the catchment by chlorinating the water at their water works. It's the residual chemicals from industrial discharges that cause taste issues which are the main worry on the Dee – especially phenols which can cause a TCP (Trichloro Phenol) like taste after chlorination.

Conclusion.

Llanfor sewage treatment works is currently non-compliant with their permit.  
It is a low risk site with little or no impact on the environment beyond the immediate discharge point.  
DCWW are currently working with NRW to ensure compliance.

ACTION.

DCWW to liaise with NRW to optimise the works to ensure compliance.



## EPR Compliance Assessment Report

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Operator/Permit holder	DWR CYMRU CYFYNGEDIG	Date	04/06/2019

### 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.

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	remediate/ liaise with NRW so that discharge has n visual impact on the river nor the immediate environment around the discharge point.	01/11/2019
A1	C3	remediate/ liaise with NRW	01/11/2019

## 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](mailto: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.