

Compliance Assessment Report CAR_NRW0037455

Permit being assessed: BG0038701

For: CROSS INN / NEBO STW ,,, held by DWR CYMRU CYFYNGEDIG

At: CROSS INN / NEBO STW , , , , , , , , , ,

Type of assessment carried out: Audit, Reason: Routine.

On 18/09/2020, between 09:00 and 17:00.

Parts of permit assessed: See criteria listed below

NRW Lead Officer: Jeremy Goddard, accompanied by: Emma Sharp.

Report sent to: CARS inbox, CARS inbox, on 02/02/2021.

1. Summary of our findings (full details in section 4)

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
WQ-A1 - Management - General management	Assessed (A)	
WQ-B1 - Operations - Permitted activities	Assessed (A)	
WQ-B2 - Operations - The site	Assessed (A)	
WQ-B3 - Operations - Operating techniques	Assessed (A)	
WQ-C1 - Emissions and monitoring - Emissions to water	Action only (X)	
WQ-D1 - Information - Records	Assessed (A)	
WQ-D2 - Information - Reporting	Assessed (A)	

Result types are explained in more detail in the 'Important Information' section below.

2. What action is required?

Criteria	Action needed	Complete by
WQ-C1	As the data collected by each sewage works is different and open to interpretation please review the MCERT flow data recorded for the period (18/09/2019 to 18/09/2020) and confirm in writing on how many occasions did a flow in excess of 2.3 litres per second discharge from the works (if at all). If flows in exceedance of 2.3 litres per second have been discharged from the works please confirm in writing the reason for this.	15/03/2021

Action criteria codes are listed in the 'Important information' section below.

3. What will happen next?

Any non-compliance we have identified and recorded on this form is an offence. It can result in criminal prosecution and/or suspension or revocation of your permit.

At this time, we do not intend to take any further action.

This statement does not stop us from taking additional enforcement action if further relevant information comes to light or offences continue.

4. Details of our assessment

This was a pre-planned audit carried out by Natural Resources Wales officers Jeremy Goddard and Emma Sharp who were accompanied by Dwr Cymru operatives Philip Brown and Sarah Mowlem.

General Observations:

The audit commenced at 14:40 hours on 18 September 2020. The weather at the time of the visit was bright sunshine.

Officers were taken through the process from the inlet point to the final effluent sampling point with Philip Brown explaining how the works is operated. The sewage works is traditional filter bed system with the infrastructure in a reasonable state of repair.

There is no screen on the inlet with all sewage going through a macerator. Mr. Brown stated that investment management were looking at the feasibility of installing a mechanical screen on the inlet. If this was approved, it would be part of a future AMP investment. Officers suggested that the replacement of the macerator with a screen would likely help reduce the levels of microplastics finding their way into the receiving watercourse.

A leaf guard has been made out of corrugated sheeting to prevent leaves and other debris falling into the primary settlement tank. Decaying leaf litter has caused a problem in the past with a scum forming within the settlement tank, see Photo 1.



Photo 1: Corrugated sheeting has been used to prevent leaf litter falling into the Primary settlement tank.

There was some moss growth on the filter bed media, but this was not deemed as being excessive. Brickwork within the wall of the filter bed did not display any obvious significant defects although there were some cracks near the top course and there were a few missing top course bricks, see Photo 2.



Photo 2: Missing brickwork can be seen on the right of the filter bed wall.

The WOF007 Works Diary was randomly checked for entries. There were no obvious omissions and all relevant results appeared to be within compliance.

The final effluent sample point was checked and at the time of the visit the effluent was clear with no evidence of any sewage fungus growth. Officers were unable to check the discharge point into the receiving watercourse as there was no gate in the fence and to go around would have meant entering a field which contained a large bull.

Flows:

There was an MCERT flow meter on site, located close to the final effluent sampling point. The meter was calibrated and had received its 5-year calibration on 16/02/2016.

There was an MCERT inspection certification on site – renewal date 30/06/2021. An in-house calibration of the MCERT meter was due to 04/12/2021.

Condition 6 from permit BG0038701 states that: 'The maximum rate of effluent discharged shall not exceed 2.3 litres per second. We have reviewed the MCERT data provided in the WAF001 form and it appears that in the period 18/09/2019 to 18/09/2020 on numerous occasions the MCERT meter has recorded flows going through the works in excess of 2.3 litres per second.

ACTION: As the data collected by each sewage works is different and open to interpretation please review the MCERT flow data recorded for the period (18/09/2019 to 18/09/2020) and confirm in writing on how many occasions did a flow in excess of 2.3 litres per second discharge from the works (if at all). If flows in exceedance of 2.3 litres per second have been discharged from the works please confirm in writing the reason for this.

OSM Sample Results:

Following the visit, a request was made to Dwr Cymru for monitoring data associated with Pennant STW, covering the period 18 September 2019 to 18 September 2020.

The permit BG0038701 which is dated 30th March 1992 has the following maximum determinant values:

Biochemical Oxygen Demand 33 mg/l

Suspended Solids 50 mg/l

Ammoniacal Nitrogen (as N) 20 mg/l

All reported sampling results from 21 October 2019 to 1 September 2020 were within permit compliance.

Please refer to Compliance Assessment Report (CAR): CAR_NRW0037464 which covers storm discharge Environmental Permit BP0218501.

If you have any queries about this report, or to discuss completion of any actions, please contact the NRW Officer named above.

Important information

Legal status of this report

Your permit is issued to you under the Environmental Permitting Regulations. You have a responsibility to comply with the conditions of your permit and prevent pollution/harm to the environment. You must also ensure that you comply with any other relevant legislation that may apply to your site's operations.

This report explains the findings of our assessment and any action you are required to take. We categorise non-compliance using our guidance for assessing non-compliance at regulated sites.

When we find potential non-compliance/s we will normally give you advice on how to maintain compliance.

To correct non-compliance, we may:

- require you to take specific actions
- issue a notice
- review the conditions of your permit.

Any advice and guidance we give will be without prejudice to any other enforcement response that we consider may be required.

Assessment results and non-compliance categories (used in section 1):

Assessment result	Description
Assessed (A)	Assessed or assessed in part, no evidence of non-compliance found
Action only (X)	Action only relating to the activity assessment
Ongoing (O)	Ongoing non-compliance, not scored

Non-compliance category	Description
C1 Major	Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property
C2 Significant	Potential to have a significant impact or effect on the environment, people and/or property
C3 Minor	Potential to have a minor or minimal impact or effect on the environment, people and/or property
C4 No environmental impact	Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property

If your assessment result in Section 1 is suspended, what does this mean?

In line with our guidance, we may suspend non-compliance for up to six months to allow time for remedial action to be taken. These will be re-instated if the action is not completed.

Full list of water quality action criteria (used in section 1 and 2):**WQ A: Management**

- WQ-A1 General management

WQ B: Operations

- WQ-B1 Permitted activities
- WQ-B2 The site
- WQ-B3 Operating techniques
- WQ-B4 Improvement programme
- WQ-B5 Pre-operational conditions

WQ C: Emissions and monitoring

- WQ-C1 Emissions to water
- WQ-C2 Emissions to land
- WQ-C3 Emissions of substances not controlled by emission limits
- WQ-C4 Installation of monitoring boreholes

WQ D: Information

- WQ-D1 Records
- WQ-D2 Reporting
- WQ-D3 Notifications

Enforcement response

Any permit condition non-compliance is an offence and we may take legal action against you. Action we take can include prosecution, serving a notice on you and/or suspension or revocation of your permit. See our Enforcement and Sanctions Guidance for further information.

Data protection notice

You should make sure that anyone named in this report knows that the information it contains will be processed by Natural Resources Wales to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s).

We may also use and/or disclose the report in connection with:

- offering or providing you with our literature or services relating to environmental matters
- consulting with the public, public bodies and other organisations (e.g. 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 our service
- Freedom of Information Act or Environmental Information Regulations requests.

We may also pass it on to our agents or representatives to do these things on our behalf.

Disclosure of information – this report will be available to view on-line

If you think this report contains commercially confidential information that should not be placed on our public register, you must contact your local Natural Resources Wales office within **fifteen working days** of receiving this report, using the contact details in the accompanying email or letter. You must give a full explanation of why it should not be

added to our public register, including specifying which information is commercially confidential. We will assess your request and respond to you within 20 working days to let you know if we agree to your request.

What do I do if I disagree with the report or have a complaint?

If you disagree with this compliance assessment report, you should contact the lead officer without delay to discuss your concerns.

If you are unable to resolve the issue with the lead officer or their line manager you should contact our Customer Contact team on 0300 065 3000 (Monday to Friday 08:00 – 18:00), or email enquiries@naturalresourceswales.gov.uk for details of how to raise your dispute further through our Complaints and Commendations procedure.

If you are dissatisfied with our response, you can contact the Public Services Ombudsman for Wales by phone on 0300 7900203 or by email at ask@ombudsman.wales

Welsh Language Standards

We are committed to establishing Natural Resources Wales as a naturally bilingual organisation. We will provide compliance reports in your preferred language.