

Compliance Assessment Report CAR_NRW0037426

Permit being assessed: AN0072301

For: Penarth Road WDPS, held by DWR CYMRU CYFYNGEDIG

At: Behind Pumphouse Antiques, Penarth Rd, Cardiff, CF11 8TT.

Type of assessment carried out: Site Inspection, Reason: Routine.

On 04/12/2020, between 13:30 and 14:30.

Parts of permit assessed: Site and records

NRW Lead Officer: Edward Davies, accompanied by: Simon Whitton.

Report sent to: OSM Mailbox, OSM Mailbox, on 08/03/2021.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
WQ-B3 - Operations - Operating techniques	Action only (X)	
WQ-A1 - Management - General management	Action only (X)	
WQ-B1 - Operations - Permitted activities	Action only (X)	
WQ-A1 - Management - General management	Action only (X)	
WQ-C1 - Emissions and monitoring - Emissions to water	Action only (X)	

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

2. What action is required?

Criteria	Action needed	Complete by
WQ-B3	Submit 'Pumping Station Key Protection Measures Operating Techniques document' referenced in table s1.2 of the permit and a list of weekly/monthly routine checks if not included in the document.	26/03/2021
WQ-A1	Paperwork should be available on site (either paper or digital copies) detailing regular checks and any issues picked up/addressed.	26/03/2021
WQ-B1	Permit only refers to one discharge location (ST 16932 7371) however our maps show a second outfall, see map - please provide explanation.	26/03/2021
WQ-A1	Submit all aspects of the the written management system for Cardiff WDPS which apply to EDM monitoring: including auditing of the EDM telemetry and data auditing.	26/03/2021
WQ-C1	Submit explanation of low confidence in data accuracy, plan to address and associated time frame.	26/03/2021

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

We met Steve Churches, DCWW Wastewater Treatment Catchment Manager- Central Catchment onsite who gave us a site tour of the pumping station and associated infrastructure; it was not possible to enter the generator/pump building due to health and safety issues related to the ceiling, described later. The pumping station serves approx 43,000 people and drains the western side of Cardiff via gravity and pumps to Cog Moors STW at a rate of 1,800 l/s. This is via two rising mains and served by 5 pumps (4 duty, 1 standby). During heavy rainfall events when this flow is exceeded two Archimedes screws start transferring additional flows to the storm tank. Once the storm tank is full additional flow is then screened and discharged to the River Ely. The storm tank is capable of holding 9000m³, the aperture for the storm screens is 6mm, the screens are maintained on a 12 month maintenance programme and are alarmed in the event that there are any issues. The storm screens are part of the weekly operational check.

During the site visit, it was noted that there was a build up of silt and rag at the inlet. The inlet to WDPS isn't part of the routine grit cleansing contract and is instead arranged on an adhoc basis. Steve confirmed that contractors were being engaged to quote and complete the work within the month (January 2021).

The outfall is checked on a weekly basis, however this is not recorded as part of the standard operational checks. This is under review and should be added to routine checklists. NRW maps show 2 outfalls at WDPS (see below) despite only 1 being referred to on the permit. Can you please confirm the presence and purpose of the second outfall.

Penarth Road WDPS has been the subject of a capital works programme to update the power supply for the site. 3 New power generators are in place, these are now supplied by the national grid. During the course of this programme, it came to light that the roof of the building which houses the existing generators and the pumps was unsafe and liable to collapse. The roof is constructed from formed concrete and has reached the end of its life expectancy, concrete has fallen from the ceiling. A crash deck has been installed in the building whilst a long term solution is sought; this allows essential maintenance of the pumps. The crash deck was put in place within 3 weeks of the fault in the roof being detected. The existing generators remain at risk of falling masonry, however these are now only providing standby power. Options to secure the roof are being assessed by external consultants SWECO.

At the time of the inspection the pumping station had 4 pumps operational; the standby pump had been removed for routine maintenance. Steve has subsequently confirmed that this is now back in place, however one of the main 4 pumps has been removed. 3 storm pumps are available to pass forward flow to Cog Moors when pumps are removed for

maintenance.

Steve Churches has sent records of routine check dates and reactive maintenance works. This should be available on site, either paperwork or digitally, operatives should be aware of its location, requirement to maintain and accessible for inspection.

12 months storm discharge data was requested and subsequently supplied by Steve Churches. This shows that the site has spilled 24 times in this time period, for a combined 8055 minutes. This data was accompanied by a note from DCWW EDM team related to the accuracy of the data:

EDM/Data comments:

Please find the EDM data for Cardiff West SPS attached as requested.

Please consider our comments on the data reliability:

The EDM spill data for 2020 YTD was provided with this request however, it is considered unreliable as there is low confidence in data accuracy:

- 1) trend spiking,
- 2) artificially looking rapid level changes,
- 3) spills occurring when sump levels and flow are decreasing or at normal levels,
- 4) storm tank level tends to flatline in wet weather just below the spill point level e.g. 97 or 99%.

Asset was added to Revisit Register in 2018 due to inaccurate EDM monitoring based on the storm tank level and as a result, the EDM data was not reported to regulators in 2018 – 2019. It is likely to be excluded in 2020 as well.

Please provide a detailed explanation as to why there is a low confidence in the data for this site; it would appear that it is just as likely spilling more often as less often if the EDM data cannot be relied upon. Submit a time frame for addressing the issue with the inaccuracy of spill data, alongside how this will be achieved.

Finally, submit all aspects of the the written management system for Cardiff WDPS (required under condition 1.1.1) which apply to EDM monitoring: including auditing of the EDM telemetry and data auditing.

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.