

Compliance Assessment Report CAR_NRW0038375

Permit being assessed: BP0231501

For: UNITED WORLD COLL OF ATLANTIC LLA, held by UNITED WORLD COLL OF THE ATLANTIC

At: UNITED WORLD COLL OF ATLANTIC, LLANTWIT MAJOR ,, LLANTWIT MAJOR ,, LLANTWIT MAJOR ,, ,.

Type of assessment carried out: Site Inspection, Reason: Incident Response (Incident number: 2102937).

On 21/04/2021, between 14:00 and 16:48.

Parts of permit assessed: Condition 2, Condition 9

NRW Lead Officer: Charlotte Rhodes, accompanied by: Martyn Davies.

Report sent to: Sarah Savage, Helpdesk Team Leader, Building Maintenance Estates, on 11/06/2021.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
WQ-B1 - Operations - Permitted activities	C3 Minor	Condition 2: The discharge shall be made in the manner and at the place specified as follows:- Discharging via: A short sea outfall, discharging below the low water mark of neap tides. Discharging to: Bristol Channel. At OS Grid Ref: SS 936 678. As shown market: Point "D" on attached plan BP0231501.
WQ-B1 - Operations - Permitted activities	C3 Minor	Condition 9: The effluent shall not contain any solid matter having a particle size greater than 6mm any two dimensions.

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

2. What action is required?

Criteria	Action needed	Complete by
WQ-B1	Repair pipe blockage and ensure that effluent discharges at	Already

Criteria	Action needed	Complete by
	the permitted location.	completed
WQ-B1	Review operations and ensure that no material is contained within the discharge.	Already completed

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.

You are non-compliant with your permit.

At this time, we are issuing you with a warning for the non-compliance recorded above. Warnings may influence future enforcement response for continued or further non-compliance.

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

Officers Charlotte Rhodes and Martyn Davies attended site following a WIRS report reference 2102937 on 21st April 2021. The weather was dry and sunny. The report stated that sewage effluent was flowing over the sea wall, adjacent to the Coastal Path, with a noticeable odour.

Officers wish to thank Colin Giles for meeting us at the college reception and guiding us down to the facilities in the following order:

Package Sewage Treatment Plant

We were informed that this operates primary treatment and is permitted to discharge into the sea in accordance with permit Condition 2. Staff lifted the lid of the tank to show us the condition, all was in working order albeit a lot of floc at the surface. At this point, Colin admitted that the discharge pipe was blocked and was therefore running effluent over the top of their beach wall and down onto the beach, but that they had been to have a look and there were "only small amount of material in it", or words to that effect.

Sea wall / report location

We were then shown down to the edge of campus where the Coastal Path crosses and effluent was meeting the beach. It was immediately clear that this effluent had been **discharging from the incorrect location** for some time; sewage fungus was visible all down the column from which it was bubbling up and over onto the beach (see attached photo), an odour was present and there were small amounts of rag/material within the effluent also, likely toilet paper. Staff were advised to check the filters within the treatment plant to mitigate this.

Staff explained this was due to a pipe blockage made up of rocks which had previously been identified by themselves but had delayed fixing during the winter months/tides.

We advised that this was **out of compliance with their discharge permit** - Condition 2 - and should be rectified as soon as possible by removing the blockage and redirecting the discharge. Additionally, that a Warning Letter and time charge would follow this visit but that in future, self-reporting of such issues by the permit holder is advised as best practice.

Remedial action following visit

On 27th April, a Code B Notice and Intention to Invoice were emailed to Sarah Savage, Helpdesk Team Leader for Building Maintenance Estates, and subsequently Alan Abrahams, Building Maintenance Manager, and regular communication of progress updates followed both via email and via phone calls between Colin Giles and Officer Rhodes.

On 12th May 2021, Officers Rhodes and Davies returned to the college to inspect progress and arrived to find that the works had been completed and problem rectified. The blockage had been removed the previous day and a new temporary cover placed over the pipe chamber where the effluent had previously been discharging from. Wayne from their facilities team assured us that the effluent was now discharging at sea in accordance with their permit, as he had been to check at low tide. He also informed us that the rag material previously noted by ourselves was no longer visible either and contractors had advised that it could have been due to them desludging a few days prior to our first visit. Photos were taken and satisfied that the problem has been resolved, it was deemed not necessary to take a sample as a result.

I returned to find that an email from Sarah Savage including photos in my inbox confirming the works as completed.

The total time between the compliance breach being reported to Atlantic College and remedial action completed to bring the permitted discharge back into compliance was 21 days.

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.