

Kath Oldring
Sent via email

25th January 2022

**Urban Waste Water Treatment (UWWT) Regulations 1994
Look Up Table Breach at Llanidloes Sewage Treatment Works on 15 July 2021**

Dear Kath

Thank you for the additional information and investigation report HD have provided in connection with the UWWT look up table breach at Llanidloes Sewage works on 15 July 2021.

We decided to get a wider view on this issue from our pan Wales NRW Permit Compliance Group panel and the EA 16.02 Group. The clear steer from these Groups was to reject HD's request that, 'the sample should not be used for assessing works compliance and is either re-scheduled or classed as compliant under the Environmental Permitting Regulations Schedule 21 (6)(5)' and any 3rd party claim.

The sample result for Chemical Oxygen Demand (COD) on 15 July 2021 for UWWTD was 130 mg/l against a look up table failure limit of 125mg/l. The minimum required 75% reduction was not achieved either, with the actual result stated as being 70.46% reduction of measured influent COD.

On reviewing the information available NRW is rejecting your request to either re-schedule the sample or class the sample taken on 15/07/2021 as compliant. As a result, this sample will stand as a LUT breach. The site also achieved a more significant COD LUT failure of 150mg/l on the 13/04/2021. A site can have two LUT failures before enforcement would be considered.

HD may already have determined how to resolve this ongoing issue and we would like to know what actions HD propose to propose to take as a remedy.

NRWs reasons for rejecting HDs request are set out here:

- Hafren Dyfrdwy (HD/Severn Trent Water) have been aware for some time that the high COD effluent received into Llanidloes Sewage Treatment Works (STW) is having an impact on the final effluent discharged to the environment. From our records I can see that Natural Resources Wales (NRW) agreed to accept a waiver for a similar exceedance in July 2016 and subsequently we rejected a further waiver request made in 2018 (for 23/05/2018 breach), both based on high COD effluent received from Sundorne Products Limited (Bryn Posteg Landfill). Over the last 5-6 years there have been several COD non-compliances with the trade effluent permit from Sundorne Products Limited (Bryn Posteg Landfill). Severn Trent Water have contacted Sundorne Products Limited (Bryn Posteg Landfill) over the exceedances and on occasion issued warning letters but have continued to accept the trade effluent into Llanidloes Sewage Treatment Works knowing that this can potentially threaten final effluent compliance. Therefore, this exceedance of the UWWTD limits was foreseeable.
- We are told that in your investigation report of 11/11/21 that Sundorne Products Ltd have generally been compliant with their trade effluent permit and discharge limit of 1,000mg/l COD, both prior to and on the day of both exceedances in 2021. Presuming that Llanidloes STW has been designed to treat a COD of 1000mg/l it indicates that there were problems with the treatment process at Llanidloes STW on these days and you have indicated long term dry spells as potentially implicated. On site COD monitoring reveals that Llanidloes STW final effluent frequently contains COD in exceedance of the upper tier UWWT limit of 250mg/l.
- Whilst we acknowledge that Severn Trent have been working with Sundorne Products Limited (Bryn Posteg Landfill) to ensure their trade effluent permit is adhered to, more should have been done to achieve compliance within a shorter timescale with a solution put in place by this time.
- Despite all the data available indicating that Llanidloes STW is frequently breaching the UWWTD limits, HD (Severn Trent Water) have not put measures in place to improve the treatment at the STW and continue to accept effluent from Sundorne Products Limited (Bryn Posteg Landfill) in the knowledge that this particular trade effluent is not effectively treated and causes poor quality final effluent discharges. We are also concerned about the discoloured nature of the STW discharge into the R. Severn and its composition. We understand from your report that this is also being investigated.
- Natural Resources Wales is now very concerned that further breaches of the UWWTD or the environmental permit will inevitably occur. HD (Severn Trent Water) must inform us of the action/s it proposes to take within a time bound Action Plan to ensure future breaches do not occur.

- You will be aware that to avoid further breaches monitoring efforts should be increased in respect of a permit breach. Your investigation report demonstrates that monitoring has been undertaken regularly from April through to August 2021, but can you please provide evidence that monitoring effort has been maintained since August 2021 to the present day.

NRW is considering enforcement action but before this we await the information requested in the last two bullet points above by mid-February 2022.

Yours Sincerely,

Jonathan Gilpin