

Compliance Assessment Report CAR_NRW0039481

Permit being assessed: AG0011001

For: PENDOYLAN STW, held by DWR CYMRU CYFYNGEDIG

At: PENDOYLAN STW, UNKNOWN, UNKNOWN, UNKNOWN, UNKNOWN.

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

On 28/02/2022, between 12:40 and 13:25.

Parts of permit assessed: Relevant conditions

NRW Lead Officer: Charlotte Rhodes, accompanied by: Hannah Jenkins.

Report sent to: CARS Mailbox, CARS Mailbox, on 02/03/2022.

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 1
WQ-C1 - Emissions and monitoring - Emissions to water	Action only (X)	
WQ-A1 - Management - General management	Action only (X)	
WQ-A1 - Management - General management	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-B1	Investigate the poor performance of the works and provide the results of your findings, any explanation and include a time frame for the resolution of issues identified.	16/03/2022
WQ-C1	The last OSM samples on NRW's WISKI system is 29/11/21, please provide any available OSM or operational monitoring data since 29/11/21 to date. Please also provide the results of the biological analysis of the white 'sewage fungus' type deposit on the discharge.	16/03/2022
WQ-A1	Please provide maintenance records for the past 12 months, including a list of routine checks and their frequency. Please include an explanation of any abbreviations or descriptions so that we may interpret the submission.	16/03/2022
WQ-A1	Arrange for the plastic litter between the tanks and the southern fence line to be cleaned up and disposed of appropriately.	16/03/2022

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

The purpose of site visit is to undertake an OSM site audit. Officers were accompanied by Paul Stallard, Matthew Roberts, Lee Banks and Christopher Edwards of Dwr Cymru throughout the inspection. The weather was overcast with intermittent rain.

Pendoylan is a small sewage treatment works, the PE for the catchment is 136 (2021 data submission), the permit limits are: 90mg/l BOD, 70mg/l TSS. The site does not have flow monitoring currently, it is listed in the NEP for AMP 7 under the monitoring driver MON5: First time MCERTS.

Inlet/Primary treatment: Site was inspected from the inlet to the outfall, there are two septic tanks as primary treatment; low flows observed at the inlet channel.

Secondary treatment comprised of two gravel filter beds, both showed ponding on the surface with tree litter blinding the surface of the filter bed, (see photos 1&2), treatment appeared to be compromised by this. Sewage effluent was seeping through the ventilation gaps between bricks of the filter bed structure to ground around the tanks instead of filtering through the process as intended. Overall, the filter beds were not functioning well and lacking maintenance.



Photo 1 - filter bed



Photo 2 - filter bed, humus tank and reedbed

The filtered flow settled in humus tanks before entering tertiary treatment stage in the form of a reed bed. Tankers reportedly empty the primary and humus tanks usually on a weekly or biweekly basis. Lots of fats and surface solids was present in the humus tanks and the effluent appeared to be poorly treated.



Photo 3 - Humus tank

Reed beds: There was a strong odour noticeable with a white colour visible through the reeds. The outfall area from the reedbed had a white deposit on the bed and weir resembling 'sewage fungus' type substance, the effluent itself was clear.

Outfall: The white substance was also visible at the final effluent sampling point and the outfall (see photo 4), deposited on the bed and continuing along the edge of the watercourse for 4-6 metres. On inspection, it appeared to be a 'sewage fungus' type deposit, Chris Edwards took a sample away for analysis. It was noted that the odour of the

final effluent was not what would normally be expected.

Paul Stallard took a sample of final effluent for analysis, on-site analysis revealed the following results:

- Ammonia(cal Nitrogen) = 19.8mg/l
- Turbidity = <5
- pH = 7.26
- Temperature = 8.9 degrees C



Photo 4 - discharge

Operational sampling data reviewed in the site records, showed ammonia readings for this site are normally between 5 and 10, February figures included readings of 5.2 and 6.9mg/l; 8.25mg/l on 21st February storm date. The last double figure reading was 24th January at 10 mg/l whereas the rest of 2022 so far has been below this. IT is noted that the thresholds in the site logbook were an average of 10mg/l with a warning “seek help” limit of 15mg/l, this is for operational use as currently there is no ammonia limit on the permit.

Upon review of the site logbook, it was noted that the reed bed weir is brushed regularly as part of maintenance. 20th January '22 the humus tank was flushed out, then fully emptied on 31st Jan however no record was found for cleaning of the tank in February.

This site is visited twice weekly however DCWW now plan to up this frequency, according to NRW compliance records, in 2015 the site was visited 5 days a week, therefore we would encourage a review of the frequency of visits to monitor and prevent a reoccurrence of issues observed on site.

It was agreed by all on site that maintenance was urgently needed, and Matthew Roberts committed to conducting a two-stage investigation as in the case of sample failures, whilst still awaiting the lab results of today's sample. Before we left for the day, Lee Banks confirmed that a contractor had been engaged to quote for work required at Pendoylan.

Lots of small plastic litter was seen on the side of one of the gravity filters near to the South site fence adjacent to the watercourse, it was advised this is cleared as soon as possible to prevent it entering the watercourse or causing harm to wildlife.

The permit is old and will need to be updated to modern conditions.

Actions (as set out in Section 2 above):

1. Investigate the poor performance of the works and provide the results of your findings, any explanation and a time frame for the resolution of issues identified.
2. The last OSM samples on NRW's WISKI system is 29/11/21, please provide any available OSM or operational monitoring data from 29/11/21 to date. Please also provide the results of the biological analysis of the white 'sewage fungus' type deposit on the discharge.
3. Provide maintenance records for the past 12 months, including a list of routine checks and their frequency. Please include an explanation of any abbreviations or descriptions so that we may interpret the submission.
4. Arrange for the plastic litter between the tanks and the southern fence line to be cleaned up and disposed of appropriately.

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.