

Compliance Assessment Report CAR_NRW0039280

Permit being assessed: CM0160701

For: LLANFOR STW FINAL EFFLUENT, held by DWR CYMRU CYFYNGEDIG

At: LLANFOR STW, UNKNOWN, UNKNOWN, UNKNOWN, UNKNOWN.

Type of assessment carried out: Site Inspection, Reason: Incident Response (Incident number: 2109274).

On 09/12/2021, between 11:30 and 12:20.

Parts of permit assessed: Whole permit

NRW Lead Officer: Simon Roberts, accompanied by: Leon Williams.

Report sent to: Michaela Thompson, North East Catchment Manager, on 03/03/2022.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
WQ-C1 - Emissions and monitoring - Emissions to water	Assessed (A)	

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

2. What action is required?

No action required.

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

Site visit undertaken by Natural Resources Wales Environment Officers on 9/12/2021 following incident reports of discolouration of final effluent at Llanfor STW outfall. Present on site during visit was Simon Roberts and Leon Williams from Natural Resources Wales, and Daniel Palmer, Steven McCloskey-Jones and Andrew Garner from DCWW.

Issue had been raised with Dwr Cymru officers and response given that the long standing issue at Llanfor STW is that the natural movement of Afon Dyfrdwy over the years has resulted in the final effluent falling short of the river itself. This has resulted in the final

effluent not being adequately diluted or taken away by the river. Combined with the vegetation growth the final effluent pools at the outlet point and over time becomes stagnated and turns septic.

However photographs provided to Natural Resources Wales seemed to suggest a further issue on site in that the final effluent was being inadequately treated prior to reaching the outlet into Afon Dyfrdwy.

During site visit the outlet was submerged under the river following recent heavy rainfall, so discharge point could not be adequately seen.

Natural Resources Wales officers inspected Llanfor STW, which consisted of an aerated treatment system followed by two settling chambers and a final effluent holding tank. Telemetry alarms set for aerator malfunction. Although an old system, the site only serves a maximum population of approximately 240 people.

Discharge from final effluent holding tank looked clear during site visit. No discernible sewage odour was present during site visit.

Natural Resources Wales officers took a sample of the final effluent (sample reference 25443).

Although Llanfor STW has an old non-consolidated descriptive permit in place (CM0160701) with no numeric limits, it was intended that a formal sample should provide indication of level of treatment received and standards of discharge into River Dee.

Formal sample results from Llanfor STW taken on the 9/12/21 were as follows:
Suspended Solids: 35mg/l
Ammonia: 0.67mg/l
BOD: 25.2

Sample results from Llanfor STW final effluent for the day of the site visit would be within usual general STW numeric limits. Based on the sample results taken on the 9/12/21 we can discount any treatment issues at the site as being the cause of the discolouration of the final effluent at the outlet point.

DCWW Pollution technician also confirmed that maintenance logs for Llanfor STW on the 15th of November (date of reported incident) had been checked and no maintenance/cleaning works had been carried out which could have caused the discolouration. Pollution Technician confirmed that no routine maintenance had been carried out since the preceding week.

It can therefore be accepted that the likely cause for the discolouration would be the issue with the final effluent outfall not reaching the Afon Dyfrdwy. However since outfall was submerged during the particular date of the site visit the results of this CAR form has been categorised as 'no evidence of non-compliance'.

This issue of the final effluent not reaching the Afon Dyfrdwy is currently in the process of being addressed by DCWW, who have a Flood Risk Activity Permit (FRA-NM-2021-0065)

in place to carry out the necessary improvement works to the outfall.

Improvement works are due to commence on the outfall after the 15th May 2022 (following conditions set in Flood Risk Activity Permit).

DCWW Pollution Technician has confirmed that a CCTV team who live in close proximity to the site check the outfall every Friday afternoon.

Action: DCWW to maintain regular site checks to include outfall checks, especially after any site maintenance/cleaning actions.

DCWW to update Natural Resources Wales with progress of outfall improvements, and to endeavour to proceed with the proposed works as soon as the conditions in the Flood Risk Activity Permit allows.

Please note any reference within the CAR/ permit to the Environment Agency means Natural Resources Wales.

In this document 'Natural Resources Wales' means the Natural Resources Body for Wales established by Article 3 of the Natural Resources Body for Wales (Establishment) order 2012.

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.