

 Environment Agency	EPR Compliance Assessment Report		Report ID: S/0750263	
This form will report compliance with your permit as determined by an Environment Agency officer				
Site	MORTIMER (STRAFIELD MORTIMER) STW, MAIN OUTLET, STW, STRATFIELD MORTIMER, BERKSHIRE, -		Permit Ref	CNTW.0404
Operator/ Permit holder	THAMES WATER UTILITIES LIMITED.			
Date	17/03/2023	Time in	12:55	Out 13:45
What parts of the permit were assessed	Wastewater Treatment Works / STW settled storm sewage, Wastewater Treatment Works secondary treated sewage effluent			
Assessment Type	Site inspection: Wastewater Treatment Works - Operator Self Monitoring (OSM)	EPR Activity:	Water Discharge	
Recipient's name/position	TWUL Performance Manager / CAR generic e-mail			
Officer's name	Andrew Valantine, Bob Whittle	Date issued	30/06/2023	

Section 1 - Compliance Assessment Summary		
<p>This is based on the requirements of the permit under the Environmental Permitting Regulations. A detailed explanation and any action you may need to take are given in the "Detailed Assessment of Compliance" (section 3). This summary details which conditions we have assessed, where we believe any non-compliance with the permit has occurred, the relevant condition and how the non-compliance has been categorised using our Compliance Classification Scheme (CCS). For more details of our CCS scheme, contact your local office.</p> <p>KEY: C1, C2, C3, C4 = CCS breach category A = Assessed (no evidence of non-compliance)</p>		
Activities and Permit Conditions Assessed	CCS Category	Condition(s) breached
1 - Wastewater Treatment Works secondary treated sewage effluent		
1.1b. WRA Works operation (c2)	A	
1.1c. WRA Maintenance of treatment plant/equipment (b5)	A	
1.1e. Maintenance of monitoring equipment (g1)	A	
2 - Wastewater Treatment Works / STW settled storm sewage		
2.3e. Storage provided and emptied (b5)	A	

Descriptive Works Fail	N/A	Number of breaches recorded	0
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If the total no of breaches is greater than zero, then please see Section 3 for details of our proposed enforcement response

Section 2 – Compliance Assessment Report Detail

This section contains a report of our findings and will usually include information on:

- the part(s) of the permit that were assessed (e.g. maintenance, training etc)
- where the type of assessment was 'Data Review' details of the report/results triggering the assessment
- any non-compliances identified
- any non-compliances with directly applicable legislation
- details of any multiple non-compliances
- details of advice given
- any other areas of concern
- all actions requested
- any examples of good practice.
- a reference to photos taken

This report should be clear, comprehensive, unambiguous and normally completed within 14 days of an assessment.

This was a routine inspection relating to both permit CNTW.0404 (final effluent) and TEMP.2783 (storm discharge). The caveat relating to the national major investigation into flow to full treatment compliance was given, ie. that this inspection was not part of that investigation, but any relevant issues raised may need to be returned to at a later time.

Thank you to TWUL staff present – TWUL new and previous Performance Manager's and Area Manager.

Mortimer Wastewater Treatment Works (WwTW's) is a small to medium sized filter works with a Population Equivalent of 4000 – 5000. The site 3 routine visits per week by TWUL operators.

The site was making a storm discharge at the time of inspection. There had been rainfall in the morning. TWUL staff had attended site this morning and confirmed there were no issues and the site was treating minimum required FFT. It was explained that the site also suffers from groundwater infiltration when those conditions occur. There is an EDM monitor on the storm tank, but there are plans to move it to the outfall channel, as it can cause false positives at the moment. The site has an inlet flow meter that is MCERTS accredited.

Flow goes from the inlet works to a 'roughing' filter at the bottom of the site to remove some of the BOD load. An interstage pumping station then pumps flow back up to a single PST. There is currently a blockage in PST de-sludge pipework. Temporary pipework is being used until the blockage can be removed.

There are two secondary biological filters and two humus tanks. The humus tank de-sludge valve is currently broken and temporarily being de-sludged by manual pumping.

There is no real time final effluent monitoring at this site. Final Effluent run-chart data was checked for the recent period. The site has a standby power generator.

It was explained by Thames Water staff that site has a scheme planned under their Wastewater Asset Assurance Programme (WAAP) relating to ensuring Final Effluent and storm permit conditions can always be met. Work planned includes removal of hydraulic restriction – storm flow screening – replacement of storm return pump with variable speed system to allow storm returns to occur sooner when incoming flows are at a higher rate than they can currently return at – interstage pumping station. The work scope is agreed, but the start date was not known at the time of inspection.

This inspection found that a number of operations improvements are needed and are in the process of being planned. Some are short-term issues that should be resolved quickly such as the blockage in PST desludge pipework and failed humus tank desludge valve. Other work required under the WAAP programme needs longer investment in replacing or upgrading treatment equipment.

Action required – Improvement work outlined above must be done as soon as possible where there is a risk of breaching permit conditions or causing pollution. Please inform me of when this work is due to start and it's estimated completion date.

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Section 3- Enforcement Response		Only one of the boxes below should be ticked	
<p>You must take immediate action to rectify any non-compliance and prevent repetition.</p> <p>Non-compliance with your permit conditions constitutes an offence and can result in criminal prosecutions and/or suspension or revocation of a permit. Please read the detailed assessment in Section 2 and the steps you need to take in Section 4 below.</p>			
<p>Other than the provision of advice and guidance, at present we do not intend to take further enforcement action in respect of the non-compliance identified above. This does not preclude us from taking enforcement action if further relevant information comes to light or advice isn't followed.</p>			
<p>In respect of the above non-compliance you have been issued with a warning. At present we do not intend to take further enforcement action. This does not preclude us from taking additional enforcement action if further relevant information comes to light or offences continue.</p>			
<p>We will now consider what enforcement action is appropriate and notify you, referencing this form.</p>			

Section 4- Action(s)			
<p>Where non-compliance has been detected and an enforcement response has been selected above, this section summarises the steps you need to take to return to compliance and also provides timescales for this to be done.</p> <p>Where the CCS Category is marked N/A then the specified action does not relate to a permit condition.</p>			
Criteria Ref.	CCS Category	Action Required / Advised	Due Date
See Section 1 above			
OA01	N/A	Improvement work outlined above must be done as soon as possible where there is a risk of breaching permit conditions or causing pollution. Please inform me of when this work is due to start and it's estimated completion date.	31/08/2023

Section 5 - Compliance notes for the Operator

To ensure you correct actual or potential non-compliance we may

- advise on corrective actions verbally or in writing
- require you to take specific actions in writing
- issue a notice
- require you to review your procedures or management system
- change some of the conditions of your permit
- decide to undertake a full review of your permit

Any breach of a permit condition is an offence and we may take legal action against you.

- We will normally provide advice and guidance to assist you to come back into compliance either after an offence is committed or where we consider that an offence is likely to be committed. This is without prejudice to any other enforcement response that we consider may be required.
- Enforcement action can include the issue of a formal caution, prosecution, the service of a notice and or suspension or revocation of the permit.
- A civil sanction Enforcement Undertaking (EU) offer may also be available to you as an alternative enforcement response for this/these offence(s).

See our Enforcement and Civil Sanctions guidance for further information

This report does not relieve the site operator of the responsibility to

- ensure you comply with the conditions of the permit at all times and prevent pollution of the environment
- ensure you comply with other legislative provisions which may apply.

Non-compliance categories

CCS category	Description
C1	A non-compliance which could have a major environmental effect
C2	A non-compliance which could have a significant environmental effect
C3	A non-compliance which could have a minor environmental effect
C4	A non-compliance which has no potential environmental effect

Section 6 – General Information

Data protection notice

The information on this form will be processed by the Environment Agency to fulfill its regulatory and monitoring functions and to maintain the relevant public register(s). The Environment Agency may also use and/or disclose it in connection with:

- offering/providing you with its literature/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 and taking any resulting action
- preventing breaches of environmental law
- assessing customer service satisfaction and improving its service
- Freedom of Information Act/Environmental Information Regulations request.

The Environment Agency may pass it on to its agents/representatives to do these things on its behalf. You should ensure that any persons named on this form are informed of the contents of this data protection notice.

Disclosure of information

The Environment Agency will provide a copy of this report to the public register(s). However, if you consider that any information contained in this report should not be released to the public register(s) on the grounds of commercial confidentiality, you must write to your local area office within 28 days of receipt of this form indicating which information it concerns and why it should not be released, giving your reasons in full.

Customer charter

What can I do if I disagree with this compliance assessment report?

A permit holder can challenge any part of the CAR form by writing to the Environment Agency office local to the site within 28 days of receipt. If the issue cannot be resolved by the local office, a permit holder can raise a dispute through our official [complaints procedure](#).

If you are still dissatisfied, you can make a complaint to the Ombudsman. For advice on how to complain to the [Parliamentary and Health Service Ombudsman](#), phone their helpline on 0345 015 4033.