

Internal Incident Report



Incident Number

WR 3/26/0913

Incident Title

Concerns over the hot tub waste water operations at [REDACTED], [REDACTED]

Incident Date

14/08/2026 12:20:00

Investigation
Details

14/08/26

WQI onsite 12:20hrs (during turn over period) at [REDACTED] explained to [REDACTED] that NIEA had received an anonymous report regarding the emptying process of the use water within the hot tubs, concerned that it was discharging via the surface drainage to the 6MW and Lough Neagh.

A walk of the site was carried out with 2 of their staff members [REDACTED] and I was shown their process as it was occurring.

Pitch 26:

Tarmac around the area was wet - the area had just been rinsed down.

The hot tub was currently being filled (and was filled to overflowing) - the water was overflowing over the decking resulting in pooled/soggy grass

The emptying process of the hot tub was shown - submersible pump into hot tub with a small grey corrugated pipe discharging the 'waste' - this pipe was inserted into a larger grey pipe under the decking which connected to the rest of the foul sewer network that receives the waste from that pitch's kitchen/toilets etc.

Pitch 87:

Staff onsite with brush/water cleaning down the surrounding pitches.

Again shown the hot tub, where there is again a submersible pump (assigned to each pitch) under the decking ready to be used, and again the plumbing underneath to take the waste from the hot tub during the emptying process.

I observed no issues during today's site visit.

There is equipment in place to properly dispose of the wastewater doesn't mean that staff may take short cuts, human nature being what it is.

During the site visit the staff asked about who had made the complainant - to which I declined. They asked to see the photographs/videos submitted to NIEA - again I declined as it could be used to identify the complainant.

Technically an NPF - on day of inspection, no discharge to a waterway, nor chemical analysis of the waste water to confirm whether it would register with the lab as a pollutant.

Update email issued to complainant by WQI on 14/08/26 at 18:29 (AE1/26/2331554) - WQI now off on AL for a week.

Reply received by complainant to [REDACTED] WQI 14/08/26 @ 19:02

Reply received by complainant to [REDACTED] WQI 24/08/26 @ 21:53

- Pitch Clarification & Video Evidence: You noted that I mentioned Pitch 87, but the verified video evidence I previously provided clearly and explicitly shows the systematic infrastructure bypass occurring at Pitch 88. Did you inspect Pitch 88 at all during your visit? It appears site staff may have directed you to a compliant setup on the adjacent pitch (87) to steer you away from the exact location of the recorded violations. Please ensure this is corrected to Pitch 88 in your official report.

- The Pitch 26 Diversion: Your notes indicate that your inspection began all the way down at Pitch 26 on the lower rental site. To be clear, the lower rental pitches were entirely outside the scope of my pollution report.

- Operational Reality vs. Guided Tours: Beginning an investigation on the extreme opposite side of the holiday park on an unrelated pitch strongly suggests a deliberate delay tactic by site management. Furthermore, it is highly unusual that senior management like [REDACTED] was present on-site to conduct this walkthrough, as he is not

routinely based here. His presence strongly suggests your visit was anticipated. When you arrived on-site to announce your inspection, were you made to wait at reception or the main office before being allowed onto the park? Escorting an inspector through a non-relevant zone first easily buys an operational team a 20-to-30-minute window to cease pumping, disconnect temporary hoses, and rectify the upper pitches before you are walked up to the actual problem area.

- **Post-Inspection Behavioural Changes:** To further illustrate that your visit has forced a change in practice, I have noted that staff on Pitch 99 are now plugging pumps inside the holiday home when draining the hot tubs. This compliant practice has only started happening since your inspection; prior to your visit, this was not the procedure being used on the upper pitches.

- **Infrastructure Discrepancies:** While you noted a larger grey foul sewer pipe connection under the decking at Pitch 26, does Pitch 88 actually possess this exact same structural connection?

Reply received by complainant to [REDACTED] 31/08/26 @ 19:05

04/09/26

WQI back onsite

Met with [REDACTED] and [REDACTED]

Explained reason for visit re: specifically pitch 88, and what is there written procedure for dealing with the waste water from the hot tubs during turnover. Niall explained that it has been dealt with, and that he's just had an hour+ meeting with the complainants about the hot tub. I stated that I could neither confirm nor deny if this are the same people - but a specific question has been raised about pitch 88.

Off to pitch 88, and under the crawl space of the decking and I observed that the upturned grey pipe that protrudes out of the side wall of the decking is connected to the large 110mm default sewer pipe - see photographs on CM) - this small grey pipe is where the corrugated flexible pipe of the submersible pump connects to empty the hot tub.

Are "hot tub" chemicals added to the water upon refilling? Yes - bromine rather than chlorine is added as a sanitiser for the hot tubs.

Chris to email their procedure to WQI.

- WQI check with [REDACTED], emails have been logged as a EIR, and [REDACTED] has emailed her back/acknowledged etc.

There is clearly the infrastructure and the procedure in place to ensure that the hot tub waste water is pumped to foul sewer. Now whether laziness/shortcuts are taken by staff (as event on the occasions of Video_1 (002) & Video_1 (005) submitted by complainant), management need to come down on their staff. Which they apparently have re: "post inspection behaviour changes", and the alleged meet with the complainant and the CEO that occurred today at 14:00 on 04/09/26).

05/09/26

Email update received from [REDACTED] on the hot top process

Officer Forename	[REDACTED]	Officer Surname	[REDACTED]
Pollution Confirmed	No	Source	
Pollutant Category		Pollutant Sub Category	
Cause		Pollution Severity	
PCA	3	Alleged Polluter	
Advisory Letter Issued	No	Fuel Laundering	No

Domestic Oil Spillage	No
Algal Bloom	No
Fish Kill Severity	
Kill Count	
Easting	
Northing	

Closed Period
X Compliance Breach
Fishkill Figures From

No
No

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