

## Compliance Assessment Report CAR\_NRW0040681

**Permit being assessed:** UP3495FT.

For: Fred Lloyd & Sons Ltd, held by Fred Lloyd & Sons Ltd

At: New Inn, Pontypool, Gwent, NP4 0TW.

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

On 09/11/2022 between 10:00 and 11:00.

Parts of permit assessed: Various

**NRW Lead Officer:** Greg Gardner.

**Report sent to:** Mr. Oliver HAZELL, Director / Technically Competent Manager on 17/11/2022.

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

| Part of permitted activity assessed (criteria)                                                                 | Assessment result | Permit condition |
|----------------------------------------------------------------------------------------------------------------|-------------------|------------------|
| A1 - Specified by permit                                                                                       | Assessed (A)      |                  |
| B3 - Infrastructure - Site drainage engineering (clean and foul)                                               | Assessed (A)      |                  |
| C4 - General Management - Storage, handling labelling and Segregation                                          | Assessed (A)      |                  |
| F1 - Amenity - Odour                                                                                           | Assessed (A)      |                  |
| F2 - Amenity - Noise                                                                                           | Assessed (A)      |                  |
| F3 - Amenity - Dust/fibres/particulates and litter                                                             | Assessed (A)      |                  |
| F5 - Amenity - Deposits on road                                                                                | Assessed (A)      |                  |
| G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales | Assessed (A)      |                  |

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

| Total number of non-compliances recorded | Total non-compliance score |
|------------------------------------------|----------------------------|
| 0                                        | 0                          |

How we use the non-compliance score to calculate your annual fee is explained 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**

This report details the site visit made on the 09 November 2022 to Fred Lloyd & Sons, Permit number EPR-UP3495FT.

NRW Officer Greg GARDNER attended the Fred Lloyd & Sons Site at Stricks Works, Polo Grounds Industrial Estate, New Inn, Pontypool, Torfaen, NP4 0TW, for a routine site inspection at 10:00am where I met with Mr. Oliver HAZELL (Director / Technically Competent Manager), George HAZELL (Brother of Mr. Oliver HAZELL) and David GEORGE (Site Supervisor) for this site. The weather was intermittent rain and mild all through the site visit. The site was very hospitable and cooperative throughout the inspection.

To remind the company following each visit Natural Resources Wales will produce a Compliance Assessment Report (CAR) detailing our comments from the inspection. If we substantiate reasonably foreseeable risks or actual impact to the environment, we can breach the business against your permit conditions which can affect your site banding and annual subsistence fees; this is scored on a Category 1 - 4 basis:

- 1 - Major, serious persistent and/or extensive impact on the environment/people/property
- 2 – Significant impact or effect on the environment/people/property
- 3 – Minor impact or effect on the environment/people/property
- 4 – A non-compliance which has no potential environmental effect

**PERMIT HISTORY**

See extract from EPR-UP3495FT regarding permit history.

**Status Log of the permit**

| Detail                                                                   | Date                  | Response Date |
|--------------------------------------------------------------------------|-----------------------|---------------|
| Licence EAWML 30223 issued                                               | 17/10/00              |               |
| Variation of EAWML 30223 issued                                          | 05/12/03              |               |
| Variation of EAWML 30223 issued                                          | 24/06/05              |               |
| Variation of EAWML 30223 issued                                          | 15/12/05              |               |
| Variation of EAWML 30223 issued                                          | 07/11/08              |               |
| Environmental Permitting<br>Regulations number<br>EPR/UP3495FT allocated |                       |               |
|                                                                          |                       |               |
| Application EPR/UP3495FT/V006                                            | Duly made<br>15/06/10 |               |
| Variation issued                                                         | 29/07/10              |               |

**COMPLIANCE BREACHES**

There are no outstanding actions or identified compliance breaches following this site visit.

**GENERAL OBSERVATIONS**

Fred Lloyd & Sons operate under a bespoke environmental permit. This site is used as a waste transfer station and an ELV (End-of-Life Vehicle) treatment facility with the waste being distributed to other companies / sites within the UK. The site was in operation at the time of the visit and there was no waste of any type was stored outside of the permit boundary at the time of the visit. Under this permit, EPR-UP3495FT, the site is permitted to accept a maximum of 75,000 tonnes of waste per annum.

**SITE INFRASTRUCTURE**

The general housekeeping on the site was in good condition with no major amounts of loose debris located on the floor (as seen in photo 1). It was also noted that the concrete impermeable flooring was generally in good condition with no visible defects noted. The site is undertaking infrastructure improvements, such new flooring, in certain areas. Further improvement works are planned and is positive to see the company taking proactive steps to improve infrastructure conditions to minimise environmental impact should a loss of containment occur (as seen in photo 2). The site has a 3-tier interceptor drainage system which was operational at the time of the site inspection with Mr. HAZELL indicating that it is regularly maintained / emptied.





**Photo 1** - General housekeeping on site to good standard



**Photo 2** - Flooring infrastructure improvements at Fred Lloyd & Sons

#### **WASTE ACTIVITIES - ELV WASTE**

During the site inspection, Officer GARDNER was satisfied at the height stockpile of vehicle shells / ELV parts and was satisfied that stockpile sizes remained at a safe height. The ELV depollution bay was in good working order with housekeeping maintained to a good standard with no concerns identified. Waste tyres are stored within skips and taken off site when required.





**Photo 3** - Good housekeeping in the ELV depollution bay at Fred Lloyd & Sons

### **WASTE RETURN SUBMISSIONS**

Fred Lloyd and Sons, Pontypool have submitted their annual waste return data for permit, EPR-UP3495FT, on time and in full. For 2021, the site has received 9,154.71 tonnes of waste(s) and removed 11,224.56 tonnes of waste(s). There are no unauthorised wastes that have been accepted on site and are within the annual permitted allowance for the amount of waste to be accepted on site (75,000 tonnes).

NRW Officer Greg GARDNER left site at 11.00am the same day.

If you have any issues with this report, please contact Greg Gardner on [greg.gardner@naturalresourceswales.gov.uk](mailto:greg.gardner@naturalresourceswales.gov.uk)

I look forward to working with the site in the future.

Thank you.

***In this document 'Natural Resources Wales' means the Natural Resource 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 of 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                                                                                                                 | Score |
|----------------------------|-----------------------------------------------------------------------------------------------------------------------------|-------|
| C1 Major                   | Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property | 60    |
| C2 Significant             | Potential to have a significant impact or effect on the environment, people and/or property                                 | 31    |
| C3 Minor                   | Potential to have a minor or minimal impact or effect on the environment, people and/or property                            | 4     |
| C4 No environmental impact | Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property       | 0.1   |

### How we use assessment scores

The number and severity of non-compliances recorded in a year will affect your annual subsistence fee the following year. A non-compliance factor is added to your site's Operator

Performance Risk Appraisal (OPRA) score when we calculate your fee to reflect the additional resource we use to assess permit compliance.

**What are suspended scores?**

In line with our guidance, we may suspend scores for up to six months to allow time for remedial action to be taken. Suspended scores will be re-instated if the action is not completed.

**Full list of Industry and Waste action criteria (used in section 1 and 2):****A: Permitted activities**

- A1 Specified by permit

**B: Infrastructure**

- B1 Infrastructure – Engineering for prevention and control of emissions
- B2 Infrastructure – Closure and decommissioning
- B3 Infrastructure – Site drainage engineering (clean and foul)
- B4 Infrastructure – Containment of stored materials
- B5 Infrastructure – Plant and equipment

**C: General management**

- C1 General management – Staff competency/training
- C2 General management – Management system and operating procedures
- C3 General management – Materials acceptance
- C4 General management – Storage, handling, labelling and segregation

**D: Incident management**

- D1 Incident management – Site security
- D2 Incident management – Accidents, emergency and incident planning

**E: Emissions**

- E1 Emissions – Air
- E2 Emissions – Land and groundwater
- E3 Emissions – Surface water
- E4 Emissions – Sewer
- E5 Emissions – Waste

**F: Amenity**

- F1 Amenity – Odour
- F2 Amenity – Noise
- F3 Amenity – Dust/fibres/particulates and litter
- F4 Amenity – Pests/birds and scavengers
- F5 Amenity – Deposits on road

**G: Monitoring and records, maintenance and reporting**

- G1 Monitoring and records, maintenance and reporting – Monitoring of emissions and environment
- G2 Monitoring and records, maintenance and reporting – Records of activity, site diary/journal/events
- G3 Monitoring and records, maintenance and reporting – Maintenance records
- G4 Monitoring and records, maintenance and reporting – Reporting and notification to Natural Resources Wales

**H: Resources efficiency**

- H1 Resource efficiency – Efficient use of raw materials
- H2 Resource efficiency – Energy efficiency

**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](mailto: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](mailto: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.