

Compliance Assessment Report CAR_NRW0041985

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 13/06/2023 between 10:00 and 10:30.

Parts of permit assessed: Various

NRW Lead Officer: Greg Gardner, accompanied by Jodie Baskerville.

Report sent to: Mr. Oliver HAZELL, Technically Competent Manager / Owner on 27/06/2023.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
C2 - General Management - Management system and operating procedures	Action only (X)	
B3 - Infrastructure - Site drainage engineering (clean and foul)	Assessed (A)	
C4 - General Management - Storage, handling labelling and Segregation	Assessed (A)	
D1 - Incident Management - Site security	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)	

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?

Criteria	Action needed	Complete by
C2	Review and update the sites EMS to include further details regarding stockpile heights / widths to assist in the prevention and / or mitigation of any potential fires. Once reviewed and updated, send to NRW regulating officer for review.	29/09/2023

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.

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 13th June 2023 to Fred Lloyd & Sons, Permit number EPR-FP3995FM.

NRW (Natural Resources Wales) Waste Regulation Officer Greg GARDNER and Senior Environment Officer, Jodie BASKERVILLE attended, the Fred Lloyd & Sons Site at Stricks Works, Polo Grounds Industrial Estate, New Inn, Pontypool, for an unannounced routine site inspection at 10:00am where we met with Mr. David GEORGE (Site Supervisor) for this site. The weather was dry, warm and humid all through the site visit.

PERMIT COMPLIANCE

ACTION ONLY – PERMIT CONDITION 1.1.1
(C2) – MANAGEMENT SYSTEM AND OPERATING PROCEDURES <i>“No waste management shall be authorised by this licence unless specified in and undertaken in accordance with the limitations in the following table</i>
• Unstable stacking of vehicle shells with potential of health, safety and environmental issues • Control measures identified within the EMS / working plan regarding safe stacking of vehicle shells not sufficient to minimise risk / management of health safety and environmental factors Please see report content for further justification

GENERAL OBSERVATIONS

The general housekeeping on the site was good 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. As detailed on the previous site inspection on 09/11/22 (CAR_NRW0040680), the site have undertaken infrastructure improvements, including new flooring, in certain areas.

The site has a 3-tier interceptor drainage system which was operational at the time of the site inspection with Mr. GEORGE indicating that it is regularly maintained / emptied. There were no issues identified with the sites interceptor drainage system, nor were there any offensive odours and / or excessive noises witnessed by NRW Officers during the site inspection. Due to the recent hot and dry weather conditions, there was also minimal airborne dust present.



Photo 1 - General housekeeping on site to good standard

WASTE ACTIVITIES - ELV WASTE

During the site inspection, NRW Officers noted that the height stockpile of vehicle shells located in the outside yard to the north of the site were stacked in potentially unstable positions (see background of photo 2). On site advice and guidance was provided to Mr. GEORGE regarding the safe stacking of vehicle shells from a health, safety and environmental viewpoint. See below extract (extract 1) from the UK Government website regarding the storage of whole ELV's. This information can also be found on [Fire prevention plans: environmental permits - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/prevention-plans-environmental-permits) A review of the sites EMS / working plan regarding safe storage of vehicle shells will need to be undertaken to incorporate health, safety and environmental factors of operating the site.

The ELV depollution bay (photos 1, 3 and 4) 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 2 - Vehicle shells stored in unstable positions (background right)

10.1 Whole ELVs

You must set out in your fire prevention plan how you will store ELVs. Each vehicle must be accessible from at least one side:

- to allow active firefighting
- so unburnt vehicles can be accessed and moved to prevent the fire spreading

These rules will limit any row to a depth of 2 vehicles.

Where you store vehicles one on top of another, or on racking, you must limit this to 3 vehicles high so the stack can remain stable during a fire. You must maintain a separation distance of 6m between rows or blocks of vehicles.

Extract 1



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



Photo 4 - Good housekeeping in the ELV depollution bay at Fred Lloyd & Sons

NRW Officer Greg GARDNER and Senior Environment Officer Jodie BASKERVILLE 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

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 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.