

## Compliance Assessment Report CAR\_NRW0043997

**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:** Site Inspection,

**Reason:** Routine.

**On:** 10/04/2024 between 09:30 and 10:00.

**Parts of permit assessed:** Various.

**NRW Lead Officer:** Greg Gardner, accompanied by Cerys Phillips.

**Report sent to:** Mr. Oliver HAZELL, Owner, on 24/04/2024.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
W1A - Waste - Management - General management	Assessed (A)	
W2A - Waste - Operations - Permitted activities	Assessed (A)	
W2C - Waste - Operations - Operating techniques	Assessed (A)	
W2D - Waste - Operations - The site	Assessed (A)	
W2E - Waste - Operations - Waste acceptance	Assessed (A)	
W3A - Waste - Emissions and monitoring - Emissions to water, air or land	Assessed (A)	
W3C - Waste - Emissions and monitoring - Odour	Assessed (A)	
W3D - Waste - Emissions and monitoring - Noise and vibration	Assessed (A)	
W4B - Waste - Information - Reporting	Assessed (A)	

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

Total 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 10th April 2024 to Fred Lloyd & Sons, Permit number EPR-UP3495FT.

NRW (Natural Resources Wales) Waste Regulation Officer Greg GARDNER and Waste Regulation Higher Education Placement Cerys PHILLIPS attended, the Fred Lloyd & Sons Site at Stricks Works, Polo Grounds Industrial Estate, New Inn, Pontypool, for an unannounced routine site inspection at 09:30am where we met with Mr. David GEORGE (Site Supervisor) for this site. The weather was wet and windy all through the site visit.

### **ACTIONS FROM PREVIOUS SITE INSPECTION - CAR\_NRW0041985 - 13/06/23**

Date	Action	Completed (Y/N)	Action Taken
13/06/23	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.	Ongoing	Discussion with Mr. HAZELL, via Telephone, on 19/04/24 where site environmental dept. currently reviewing EMS to amend / update section regarding stockpile management

### **PERMIT BREACHES / ACTIONS**

No permit breaches / actions have been identified during this site inspection.

### **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. The site have undertaken improvement works on the flooring in recent years with the intention to improve further areas on site.

The site has a 3-tier interceptor drainage system which was operational at the time of the site inspection with Mr. GEORGE who provided evidence of the interceptor being recently

serviced and maintained (February 2024). There were no issues identified with the sites interceptor drainage system despite their being heavy rain, nor were there any offensive odours and / or excessive noises witnessed by NRW personnel during the site inspection.



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

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

During the site inspection, NRW personnel 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. On site advice and guidance was provided to Mr. GEORGE regarding the safe stacking of vehicle shells as well as stockpile heights from a health, safety and environmental viewpoint. During the site visit, it was noted that waste(s) were being removed and stockpiles were being reduced.

See below extract (extract 1) from the UK Government website regarding the guidance for 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/fire-prevention-plans-environmental-permits) A review of the sites EMS / working plan regarding safe storage of vehicle shells is currently ongoing to be undertaken to incorporate health, safety and environmental factors of operating the site.

The ELV depollution bay (photos 1, 4 and 5) 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. Car batteries were stored within secondary containment measures with no evidence of any leaks occurring.



**Photo 2** - Vehicle shells stored in unstable positions (background right)



**Photo 3** - Vehicle shells stored at Fred Lloyds & Sons

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



**Photo 5** - Good housekeeping in the ELV depollution bay at Fred Lloyd & Sons

### WASTE RETURN SUBMISSIONS

The site have submitted their annual waste returns on time and in full to NRW. See table below for annual totals in relation to permit (EPR-UP3495FT). No unauthorised waste(s) have been accepted to site.

	Waste(s) Received (Tonnes)	Waste(s) Removed (Tonnes)	Annual Permitted Allowance (Tonnes)
<b>Total</b>	<b>12,305.52</b>	<b>11,013.97</b>	<b>75,000</b>

NRW Officer Greg GARDNER Waste Regulation Higher Education Placement Cerys PHILLIPS left site at 10:00am 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)

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.

**If your assessment result in Section 1 is suspended, what does this mean?**

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 Waste compliance criteria (used in section 1 and 2):**

**1. Management**

- W1A – General management
- W1B – Energy Efficiency (MCP/SG facilities only)
- W1C – Avoidance, recovery and disposal of wastes produced by the activities

**2. Operations**

- W2A – Permitted activities
- W2B – Waste recovery plan
- W2C – Operating techniques
- W2D – The site
- W2E – Waste acceptance
- W2F – Technical requirements
- W2G – Improvement programme
- W2H – Pre-operational conditions

**3. Emission and Monitoring**

- W3A – Emissions to water, air or land
- W3B – Emissions of substances not controlled by emission limits
- W3C – Odour
- W3D – Noise and vibration
- W3E – Monitoring
- W3F – Pests
- W3G – Fire

**4. Information**

- W4A – Records
- W4B – Reporting
- W4C – Notification

**Enforcement response**

Any non-compliance with a permit condition 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 twenty 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 to 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.