

Compliance Assessment Report CAR_NRW0052757

Permit being assessed: XP3833UB.

For: East Bank Road Facility, **held by:** G D Environmental Services Ltd

At: Unit 18a East Bank Road, Felnex Industrial Estate, Newport, South Wales, NP19 4PP.

Type of assessment: Report/Data Review,

Reason: Routine.

On: 06/08/2026.

Parts of permit assessed: See comments section.

NRW Lead Officer: David Thomson.

Report sent to: Redacted, HR and Compliance Manager, on 21/08/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR4B - Installations - Information - Reporting	Assessed (A)	
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	C3 Minor	3.1.2
IR4C - Installations - Information - Notification	C4 No impact	4.3.1(b)(i) and 4.3.2

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

Total non-compliances recorded	Total non-compliance score
2	4.1

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
IR3A(1)	The operator shall continue to investigate the root cause of the lead limit exceedance and undertake measures to prevent the reoccurrence and/or measures to rectify, limit or prevent any pollution of the environment.	Already completed
IR4C	The operator shall ensure that all future Schedule 5 Part A notifications are immediately submitted to NRW following the	Already completed

Criteria	Action needed	Complete by
	detection of a permitted limit exceedance.	

Compliance 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

SUMMARY

1. The operator submitted the Q2 2026 sewer 1 monitoring form within the required 28-day reporting period.
2. Monitoring results recorded a lead concentration of 2.14 mg/l on 26 June 2026, exceeding the permitted limit of 0.3 mg/l and resulting in a C3 non-compliance with permit condition 3.1.2.
3. The operator was unable to identify the root cause of the lead exceedance. Further investigation is therefore required.
4. The operator failed to immediately notify NRW of the lead exceedance following detection, resulting in a C4 non-compliance with the permit notification requirements.

ASSESSMENT DETAILS

This Compliance Assessment Report (CAR) is a record of Natural Resources Wales' (hereafter NRW) assessment of G.D. Environmental Services Limited's (hereafter the operator) Q2 2026 (April to June) S1 reporting form for emissions to sewer against the relevant environmental permit conditions for Reporting, Emissions & Monitoring and Notifications.

Documents Provided by the Operator

Reference 1 – 20231211-out-GDE-WT BRef reporting forms-SEWER-APRIL-JUNE26_.pdf (submission date – 28 July 2026)

Reference 2 – Schedule 5 Breach of Lead Reading.pdf (submission date – 28 July 2026)

Assessment Structure

COMPLIANCE CRITERIA (e.g., IR4B, IR3A and IR4C)

- (a) Permit Condition
- (b) Compliance Assessment
- (c) Consolidation of Non-Compliance Score
- (d) Root Cause Analysis (when applicable)

IR4B – INFORMATION – REPORTING

(a) Permit Condition

Environmental permit condition 4.2.3 states:

Within 28 days of the end of the reporting period the operator shall, unless otherwise agreed in writing by Natural Resources Wales, submit reports of the monitoring and assessment carried out in accordance with the conditions of this permit, as follows:

- (a) in respect of the parameters and emission points specified in schedule 3 table S3.1;
- (b) for the reporting periods specified in schedule 4 table S4.1 and using the forms specified in schedule 4 table S4.3; and
- (c) giving the information from such results and assessments as may be required by the forms specified in those tables.

Table S4.1 of Schedule 4 to the environmental permit is partially reproduced below.

Table S4.1 Reporting of monitoring data

Parameter	Emission or monitoring point/reference	Reporting period	Period begins
Emissions to water Parameters as required by condition 3.3.1	S1	Every three months	01 January 01 Apr 01 Jul 01 Oct

Note – although the reporting period is once every 3 months, some parameters (i.e., PFOS and PFOA) are only monitored once every 6 months, therefore it is expected that PFOS and PFOA will be reported six monthly.

Table S4.3 of Schedule 4 to the environmental permit is partially reproduced below.

Table S4.3 Reporting forms

Media/parameter	Reporting format	Date of form
Sewer	Form sewer 1 or other form as agreed in writing by Natural Resources Wales	17/08/2022

Note – A new sewer 1 form was issued to the operator on 11 December 2023 (Form no. sewer1 / 01/01/2024).

(b) Compliance Assessment

Point Source Emissions to Sewer – S1

1. The operator submitted monitoring results for emissions to sewer by email on 28 July 2026 (reference 1). This is within the 28 day reporting window, demonstrating compliance with the reporting requirements of the environmental permit.
2. The operator submitted monitoring results using the *sewer 1* reporting form specified in Table S4.3 of Schedule 4, demonstrating compliance with the reporting requirements of the environmental permit.
3. The operator submitted monitoring results for the reporting period specified in Table S4.1 of Schedule 4, demonstrating compliance with the reporting requirements of the environmental permit.
4. The operator submitted monitoring results for all the parameters and emission points specified in Table S4.1 of Schedule 4, demonstrating compliance with the reporting requirements of the environmental permit.

Note: NRW has identified an error in permit condition 4.2.3(a), which creates ambiguity regarding the reporting requirements. The condition incorrectly refers to the parameters and emission points specified in Schedule 3, Table S3.1, which relates to emissions to air and contains no reporting requirements. The relevant reporting requirements are instead contained within Schedule 4, Table S4.1, which identifies the emission point, parameters and reporting period for emissions to sewer.

Consequently, NRW will not assess non-compliance with permit condition 4.2.3(a) under the Compliance Classification Scheme (CCS) until the error has been corrected. NRW will undertake an administrative variation to amend the permit and ensure consistency between the permit conditions and associated reporting requirements.

Compliance Classification Scheme: There are no incidents of non-compliance with permit condition 4.2.3

Justification: NA

Action: no action required

(c) Consolidation of Non-Compliance Scores

Consolidation of CCS scores is not required.

(d) Root Cause Analysis

NA

IR3A (1) – EMISSIONS AND MONITORING – EMISSIONS TO WATER

(a) Permit Condition

Environmental permit condition 3.1.2 states:

The limits given in schedule 3 shall not be exceeded.

Table S3.2 Point source emissions to sewer, effluent treatment plant or other transfers off-site – emission limits and monitoring requirements.

Emission point ref. & location	Source	Parameter	Limit (incl. unit)	Reference period	Monitoring frequency	Monitoring standard or method
S1 on site plan in schedule 7 (emission to public foul sewer)	Site effluent treatment plan	Lead (Pb)	0.3 mg/l	None set	Once every day	Various EN standards available (e.g. EN ISO 11885, EN ISO 17294-2, EN ISO 15586)

Note: Compliance Assessment Report CAR_NRW0042709, 25 October 2023, reduces the monitoring frequency requirements for lead from daily (as stated in Schedule 3, Table S3.2) to monthly.

(b) Compliance Assessment

Emission Limit Exceedance – Lead

The emission monitoring result for lead on 26 June 2026 was 2.14mg/l. This is above the permitted emission limit specified in Table S3.2 of Schedule 3, demonstrating non-compliance with condition 3.1.2 of the environmental permit.

The operator submitted a Schedule 5 Part B notification on 28 July 2026 (reference 2). The notification states that the operator was unable to identify the root cause of the exceedance.

Compliance Classification Scheme (CCS): As a result of this non-compliance with permit condition 3.1.2, a C3 score has been recorded against compliance criteria IR3A(1) – EMISSIONS AND MONITORING – EMISSIONS TO WATER.

Justification: A C3 score has been levied as it is reasonably foreseeable that an exceedance of the lead emission limit will have a minor impact or effect on the environment.

Action: The operator shall continue to investigate the root cause of the lead limit exceedance and undertake measures to prevent the reoccurrence and/or measures to rectify, limit or prevent any pollution of the environment.

(c) Consolidation of Non-Compliance Scores

Consolidation of CCS scores is not required.

(d) Root Cause Analysis

NA

IR4C – INFORMATION – NOTIFICATION**(a) Permit Condition**

Environmental permit condition 4.3.1 (b)(i) states:

(b) in the event of a breach of any permit condition the operator must immediately
(i) inform Natural Resources Wales

Condition 4.3.2 of the environmental permit states:

Any information provided under condition 4.3.1(a)(i) or 4.3.1(b)(i) where the information relates to the breach of a limit specified in the permit, shall be confirmed by sending the information listed in schedule 5 to this permit within the time period specified in that schedule.

(b) Compliance Assessment*Limit Exceedance – Lead*

The operator notified NRW of a lead limit exceedance on 28 July 2026. The exceedance of the permitted emission limit was detected on 15 July 2026. The operator did not immediately notify NRW following detection, demonstrating non-compliance of the notification requirements of the environmental permit.

Compliance Classification Scheme: As a result of this non-compliance with permit conditions 4.3.1 (b)(i) and 4.3.2, a C4 score has been recorded against compliance criteria IR4C – INFORMATION – NOTIFICATION.

Justification: A C4 score has been levied as it is reasonably foreseeable that the failure to immediately notify NRW of a permitted limit exceedance will not have any impact on the environment.

Action: The operator shall ensure that all future Schedule 5 Part A notifications are immediately submitted to NRW following the detection of a permitted limit exceedance.

(c) Consolidation of Non-Compliance Scores

Consolidation of CCS scores is not required.

(d) Root Cause Analysis

NA

ACTION TRACKER

6BCriteria	7BAction needed	8BComplete by	SStatus
IR3E	The operator shall undertake a review of the emissions monitoring programme and verify that all parameters specified in Schedule 3 Table S3.2 are being analysed in accordance with the permit requirements.	28 October 2026	Ongoing
IR3E	The operator shall review and, where necessary, revise its written management system and emissions monitoring procedures to ensure that permit monitoring requirements are correctly implemented and verified by third-party laboratories responsible for emissions monitoring.	28 October 2026	Ongoing

Note – It is the operator's responsibility to notify NRW when the above action(s) are completed and to provide

sufficient evidence to demonstrate that the required measures have been implemented.

[END]

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 required for the permit condition assessed to avoid non-compliance. No non-compliance scored at this time
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 Industry compliance criteria (used in section 1 and 2):**1. Management**

- IR1A – General management
- IR1B – Finance (only applicable to Landfill)
- IR1C – Energy efficiency
- IR1D - Efficient use of raw materials
- IR1E - Avoidance, recovery and disposal of wastes produced by the activities
- IR1F - Multiple operator installations

2. Operations

- IR2A – Permitted activities
- IR2B – The site
- IR2C – Operating techniques
- IR2D – Technical requirements
- IR2E – Improvement programme
- IR2F – Pre-operational conditions
- IR2G – Landfill engineering (only applicable to Landfill)
- IR2H – Waste acceptance (only applicable to Landfill)
- IR2I – Leachate levels (only applicable to Landfill)
- IR2J – Closure and aftercare (only applicable to Landfill)
- IR2K – Landfill gas management (only applicable to Landfill)

3. Emission and Monitoring

- IR3A(1) – Emissions to water
- IR3A(2) – Emissions to air
- IR3A(3) – Emissions to land
- IR3B – Emissions of substances not controlled by emission limits
- IR3C – Odour
- IR3D – Noise and vibration
- IR3E – Monitoring
- IR3F – Pests
- IR3G – Air quality management plans
- IR3H – Monitoring for the purposes of the Industrial Emissions Directive (this heading includes Large Combustion Plants)
- IR3I – Fire

4. Information

- IR4A – Records
- IR4B – Reporting
- IR4C – 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.

Disputing the Content of this Compliance Assessment Report Form

If you disagree with the content of this Compliance Assessment Report form, you should submit your concerns, in writing, to the regulating officer who issued it within **15 working days** of its issue. This will be treated as a **Stage 1 review**.

If you are not satisfied with the outcome of the stage 1 review, you may request a **Stage 2 appeal**. This request must be submitted **within 21 working days** of receiving the response from the stage 1 review.

Further details on our review and appeal process are available at: [Natural Resources Wales / Appeal a regulatory decision from Natural Resources Wales](#)

Concerns Not Related to the Content of this Compliance Assessment Report Form

If your concerns do not relate to the content of the Compliance Assessment Report form, you should first attempt to resolve the issue with the regulating officer or their line manager.

If the issue remains unresolved, please contact our **Customer Contact Team**:

- **Telephone:** 0300 065 3000 (Monday to Friday, 09:00–17:00)
- **Email:** enquiries@naturalresourceswales.gov.uk

They will provide details on how to escalate your concerns through our **Complaints and Commendations procedure**.

If you are dissatisfied with our response, you may contact the **Public Services Ombudsman for Wales**:

- **Telephone:** 0300 790 0203
- **Email:** 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.