

Compliance Assessment Report CAR_NRW0037676

Permit being assessed: FP3995FM.

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

At: Stricks Works, Polo Grounds Industrial Estate, New Inn, Pontypool, Gwent, NP4 0TW.

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

On 09/02/2021 between 11:15 and 11:45.

Parts of permit assessed: A / B / C / D / F / G

NRW Lead Officer: Greg Gardner, accompanied by Alex Bowder.

Report sent to: Oliver Hazell, Technically Competent Manager on 03/03/2021.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
C4 - General Management - Storage, handling labelling and Segregation	C3 Minor	4.6.1 (c)
A1 - Specified by permit	Assessed (A)	
B1 - Infrastructure - Engineering for prevention and control of emissions	Assessed (A)	
B2 - Infrastructure - Closure and decommissioning	Assessed (A)	
B3 - Infrastructure - Site drainage engineering (clean and foul)	Assessed (A)	
B4 - Infrastructure - Containment of stored materials	Assessed (A)	
B5 - Infrastructure - Plant and equipment	Assessed (A)	
C1 - General Management - Staff competency/training	Assessed (A)	
C2 - General Management - Management system and operating procedures	Assessed (A)	
C3 - General Management - Materials acceptance	Assessed (A)	
D1 - Incident Management - Site security	Assessed (A)	
D2 - Incident Management - Accidents, emergency and incident planning	Assessed (A)	
F1 - Amenity - Odour	Assessed (A)	
F2 - Amenity - Noise	Assessed (A)	
F3 - Amenity - Dust/fibres/particulates and litter	Assessed (A)	
F4 - Amenity - Pests/birds and scavengers	Assessed (A)	
F5 - Amenity - Deposits on road	Assessed (A)	
G1 - Monitoring and Records, Maintenance	Assessed (A)	

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
and Reporting - Monitoring of emissions and environment		
G2 - Monitoring and Records, Maintenance and Reporting - Records of activity, site diary/journal/events	Assessed (A)	
G3 - Monitoring and Records, Maintenance and Reporting - Maintenance records	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
1	4

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
C4	Ensure stockpiles of general waste are separated (not over lapping) adequately to prevent spread of fire risk	01/03/2021

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 9th February 2021 to Fred Lloyd & Sons, Permit number EPR-FP3995FM.

Officers Alex BOWDER and 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 11:15am where we met with Mr. Adrian LEWIS (Site Manager). Mr. Oliver HAZELL is the designated TCM (Technically Competent Manager) for this site. The weather was dry and cold all through the site visit.

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 COMPLIANCE

CATEGORY 3 BREACH – PERMIT CONDITION 4.6.1

(C4) – Storage, handling labelling and Segregation

“Notwithstanding the specification of permitted waste types under condition 1.2, wastes displaying any of the hazardous properties or forms specified in the Table 4.6 shall only be handled and/or stored on the site in accordance with the standards specified in accordance with Table 4.6”

- Stockpiles of waste without clear established separation distances

Please see report content for further justification

PERMIT HISTORY

Status log of the permit

Description	Date	Comments
Permit determined EAWML 30294	15/09/03	Original permit issued to Fred Lloyd and Sons Limited.
Application EPR/FP3995FM/V002	Duly made 05/04/16	Administrative variation to update registered office address.
Variation determined EPR/FP3995FM	08/04/16	Varied permit issued.

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. The site is permitted to accept a maximum of 25,000 tonnes of waste per annum. The site was fully stocked with waste and accessing the back / north end of the site was restricted due to waste blocking our access route. NRW intend to review your EMS (Environmental Management System) going forward to ensure current site activities are reflected and managed in accordance with the document.

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. The site has a 3 tier interceptor drainage system which was operational at the time of the site inspection and is maintained / emptied periodically. Mr. LEWIS indicated it was 11 months ago since the last time the system was maintained / emptied.



Photo 1 - Flooring infrastructure at Fred Lloyds & Sons was in good condition

WASTE ACTIVITIES - GENERAL WASTE

Fred Lloyd & sons During the site visit, a large stockpile of general waste (as seen in photo 2) was located at the south section of the site. The general waste is transported to the main company, GD Environmental, Newport for further processing. This waste, according to the permit, must be stored securely and separately in designated bays. As per photo 2, the general waste was over lapping the bay. This has a potential for a spread of fire should one occur.



Photo 2 - Stockpile of general waste

Located to the right of general waste stockpile (as seen in photo 2), there was also a large pile of mill scale (as seen in photo 3). Mill scale is the remnants of is the flaky surface of hot rolled steel, consisting of the mixed iron oxides. The mill scale located at Fred Lloyd & Sons originated from Liberty Steel, Newport and Celsa steel, Cardiff. Whilst this is a permitted waste to be accepted at this site, it was noted that there was with very little separation distances between the different waste piles. As per above (photo 2) this has a potential for a spread of fire should one occur therefore it is recommended to ensure the stockpiles of waste are kept separated at all times and should not overlap to ensure good housekeeping standards.



Photo 3 - Large stockpile of mill scale

ACTION: Ensure stockpiles of general waste are separated (not over lapping) adequately to prevent spread of fire risk

WASTE RETURN SUBMISSIONS

Further details of the waste return data can be found on a separate CAR form that was issued for this site on 12/02/21, Report ID - CAR_NRW0037336.

Officers Alex BOWDER and Greg GARDNER left site at 11.45am the same day.

If you have any issues with this report please contact Greg Gardner on greg.gardner@naturalresourceswales.gov.uk

I look forward to working with the site in 2021.

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.