

## Compliance Assessment Report CAR\_NRW0040870

**Permit being assessed:** WB3893HZ.

For: Bayliss Metals, held by Bayliss Recovery Limited

At: Tremorfa, Cardiff, CF24 5SD.

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

On 18/11/2022 between 09:00 and 09:30.

Parts of permit assessed: all parts

**NRW Lead Officer:** Magda Leonowicz, accompanied by Amy Bailey, Owen Clee.

**Report sent to:** Ian Lewis, Environment Manager on 30/12/2022.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
B3 - Infrastructure - Site drainage engineering (clean and foul)	Assessed (A)	
B4 - Infrastructure - Containment of stored materials	Assessed (A)	
C1 - General Management - Staff competency/training	Assessed (A)	
C4 - General Management - Storage, handling labelling and Segregation	Action only (X)	
D1 - Incident Management - Site security	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
C4	Please ensure all containers with hazardous waste i.e. oils are labelled as appropriate and provide an evidence showing this has been done.	16/01/2023

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

I Industry & Waste Regulation Officers Magda Leonowicz, Amy Bailey and a Waste Permitting Officer Owen Clee conducted a site inspection at Bayliss Metals Plot 1C Martin Rd, Tremorfa Ind Est, Tremorfa on 18/11/2022. On arrival, we were met on site by the site's technically competent manager Ian Lewis. Other staff were also present at the time of the visit, who were operating machinery and sorting waste. The purpose of the visit was to assess compliance with the environmental permit (EPR/WB3893HZ) and introduce myself as the site's compliance officer. During the visit, the weather remained fine, with no precipitation and low wind.

### Site walk over:

As it was the first time Regulation Officer Magda Leonowicz had visited since taking over regulation of the site, Mr Lewis provided a walkover tour of the site. The site receives scrap metals, End-Of-Life Vehicle's (ELV's) and waste batteries from smaller waste operators. During the visit, the site was fully operational, waste metals were accepted, sorted then sheared and transported off site for recovery. Accepted waste was stored and sorted outside in line with the Schedule 1 of the permit, Table S1.1 '*All waste must be stored and treated on an impermeable surface with sealed drainage*'. Currently there is a low number of ELVs on the market, and there were no ELVs accepted or stored on site during the visit.

### (B3) Site drainage engineering (Clean and Foul):

During the visit we discussed the drainage infrastructure. The site benefits from an impermeable surface and a sealed drainage system. The impermeable surface was well maintained and clear of dirt/oil or grease during the inspection. The run-off from the site flows into an Arco drain then to a 3-chamber interceptor, through a cut off valve chamber and into a soakaway.

An electronic version of the certificate showing when the interceptor was last cleaned was available at the site. Please e-mail a copy of the cleaning certificate to [magda.leonowicz@cyfoethnaturiolcymru.gov.uk](mailto:magda.leonowicz@cyfoethnaturiolcymru.gov.uk), within 10 working days from the date of this report for our records

**(B4) Containment of stored materials:**

As mentioned above, incoming waste metals are deposited on one pile in a designated area, which benefits from an impermeable surface with sealed drainage, then from there the waste is sorted by heavy-duty grabs. Ferrous metals are sheared by an electric powered mechanical shears, then stored in skips or in designated bays prior to transfer for onward recovery.

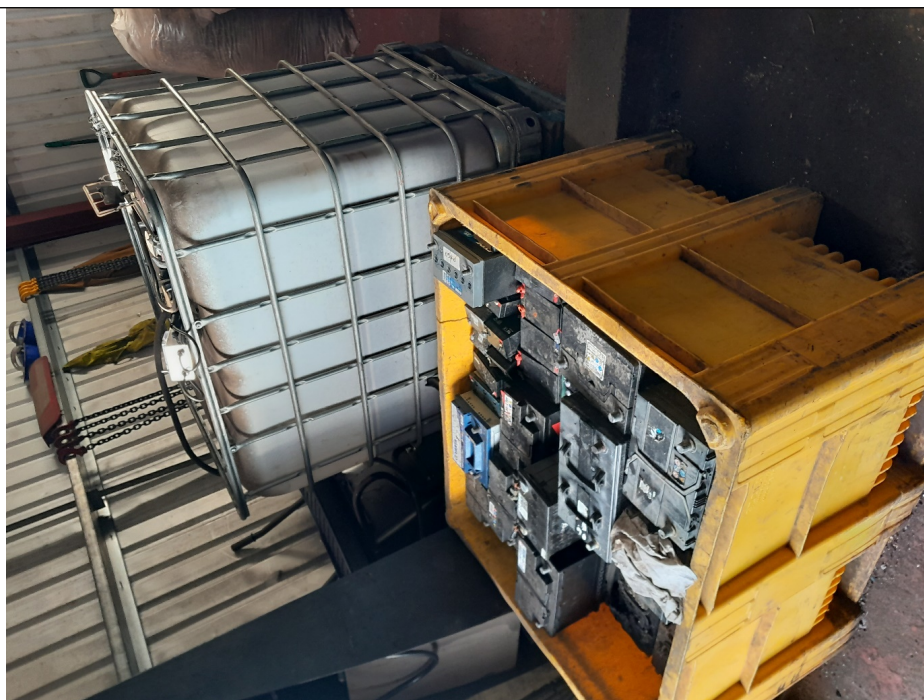
Non-ferrous metals (i.e. copper etc) are weighed prior to treatment and are stored in a secure building.

Hazardous wastes are not mixed and are stored separately to non-hazardous/other wastes, substances or materials, in accordance with permit condition 2.4.3 Liquids such as oils, waste batteries and a small number of tyres were all stored in a secure building which benefits from an



impermeable surface. All waste were stored in suitable containers as per permit condition 2.4.3 *Hazardous waste storage and treatment*. All waste liquids in containers were provided with secondary containment in line with permit condition 3.1.3.



**(C1) Staff competency and training:**

The Technically Competent Manager for the site is Mr Ian Lewis and his continuing competency is valid until 23/02/24.

**(C4) Storage, Handling, Labelling and Segregation:**

As mentioned above, oils were stored in suitable containers, however it was noted that not all the containers containing hazardous waste were labelled. As oils are classed as hazardous waste, to ensure appropriate segregation please ensure all containers are suitably labelled.



**Action:**

**ACTION:** Please ensure all containers with hazardous waste i.e. oils are labelled as appropriate and provide an evidence showing this has been done.

**DUE:** Provide the photographic evidence by 16/01/2023.

**(D1) Site security:**

Security measures were visually inspected during the site visit. The site benefits from suitable fencing and gate securing the premises. The gate and fencing both appear to be in good condition. The site also benefits from CCTV.

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.