



## Waste Audit Report

This form will report compliance with environmental legislation as detailed in this report and as determined by an Officer of Natural Resources Wales

|                          |                          |              |            |             |            |     |
|--------------------------|--------------------------|--------------|------------|-------------|------------|-----|
| Permit Number            | EPR/BB3192FJ             | Ref          | HWARCC0008 |             |            |     |
| Operator / Permit holder | Bayliss Recovery Limited |              |            |             |            |     |
| Date                     | 02/06/2026               |              |            |             |            |     |
| Premises                 | Installation             | Waste Permit | X          | Exemption   | Producer   | CBD |
| Site contact (s)         | Ian Lewis                |              |            |             |            |     |
| Officer's name (s)       | Craig Coleman            |              |            | Date issued | 25/06/2026 |     |

### Section 1 Assessment Summary – Hazardous Waste

The assessment in this section is based on the requirements of *The Hazardous Waste (Wales) Regulations 2005*

A detailed explanation of any non-compliances identified and actions you may need to take are given in sections 2 & 4 below.

#### Compliance Summary

| Compliance check type                 | Assessed during audit | Non-compliance identified |
|---------------------------------------|-----------------------|---------------------------|
| HW Consignment notes (waste received) | Not assessed          | N/A                       |
| HW Consignment notes (waste removed)  | Yes                   | Yes                       |
| Mixing / treatment of hazardous waste | Not assessed          | N/A                       |
| HW Records and returns                | Yes                   | Yes                       |
| Storage                               | Yes                   | Yes                       |

### Section 2 – Waste Assessment Report Detail

#### Introduction

This audit has been undertaken as part of a national interceptor project being delivered across Wales by Natural Resources Wales' Hazardous Waste Team. The project aims to assess site drainage infrastructure at permitted waste facilities and to ensure that waste arising from interceptors and associated site drainage are correctly assessed and classified. Specifically, the project seeks to verify that this waste is classified in accordance with Technical Guidance WM3 and that permitted facilities across Wales are complying with the requirements of the Hazardous Waste (Wales) Regulations 2005. Through this work, NRW aims to improve consistency in waste classification and reduce the risk of misclassification of interceptor-derived wastes.

#### Site Report

NRW Hazardous Waste Officers Craig Coleman and Daniel Grant attended Bayliss Recovery Limited (trading as Bayliss Metals), Princes Way, Bridgend Industrial Estate, Bridgend, CF31 3AQ on 2 June 2026. The site operates under Environmental Permit EPR/BB3192FJ for metal recycling and end-of-life vehicle (ELV) depollution and dismantling, and is registered as a hazardous waste premises under premises code CAA266. The site manager present was Craig Edwards, but the site is typically overseen by Ian Lewis.

During the site visit on 2 June 2026, NRW officers inspected the hazardous waste generated on site, how it is stored, and how the site drainage infrastructure manages potentially contaminated run-off. Bayliss operates primarily as a scrap metal operation and battery bulking facility, with end-of-life vehicle depollution undertaken only on a limited scale. Mr Edwards advised that Bayliss is not currently undertaking a significant volume of depollution due to market conditions, with only a small number of vehicles depolluted on a weekly basis. No depollution was taking place at the time of the visit.

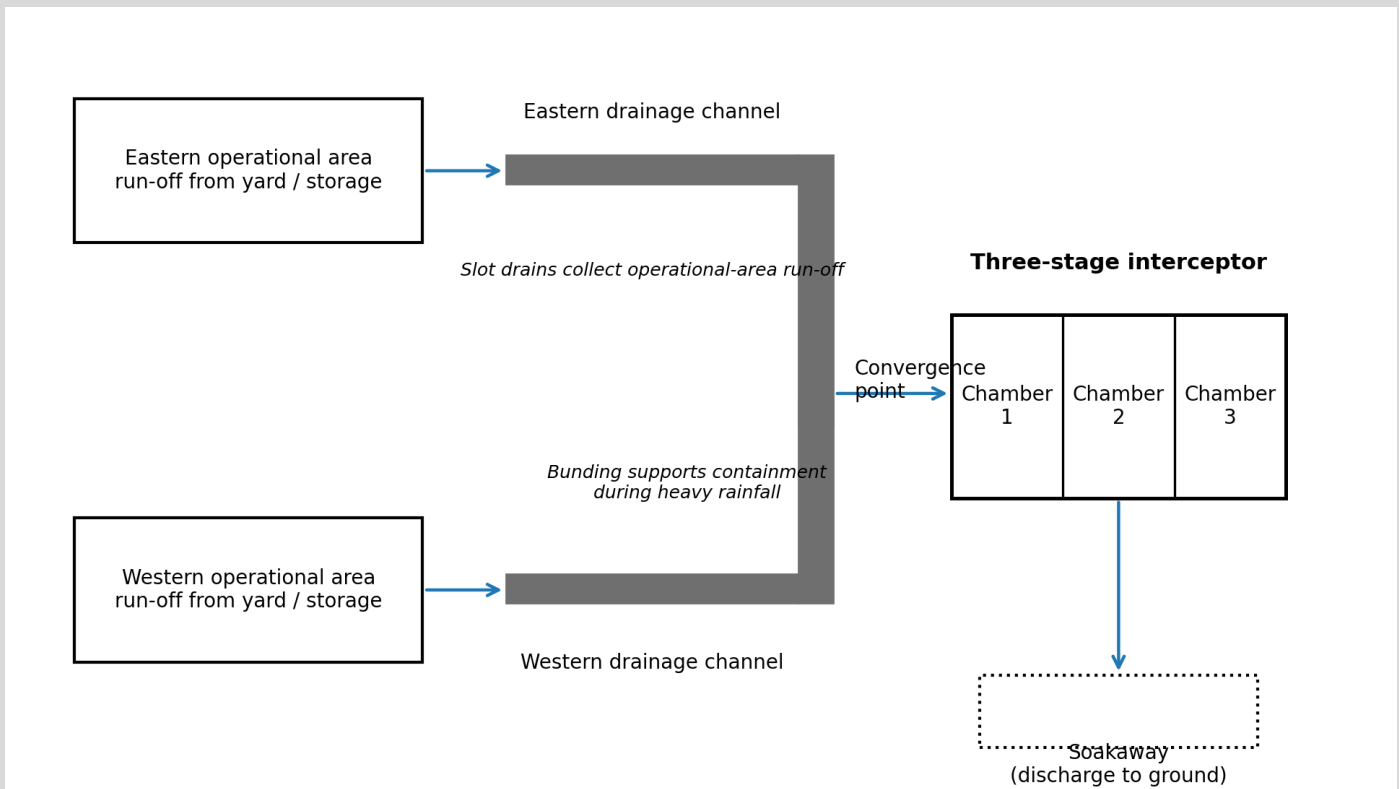
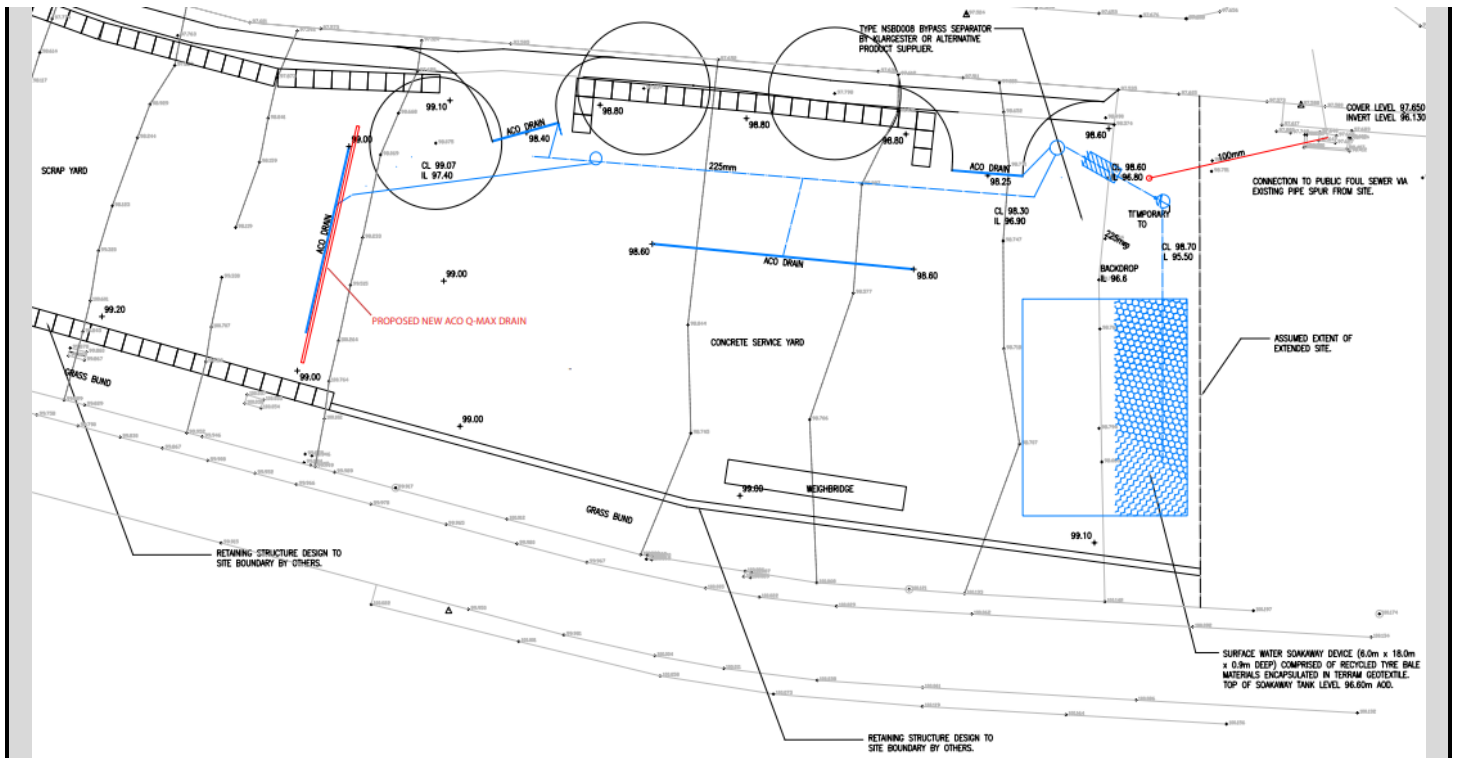
Hazardous waste generated on site arises principally from the import and storage of lead acid batteries from neighbouring sites, the purchasing of catalytic converters, and limited ELV depollution activities. Wastes generated from depollution include oils, oil filters, antifreeze and other vehicle fluids. Dirty granules are also generated where spills occur during the depollution process. These wastes are generated and handled within the depollution bay and the storage areas to the side of the depollution bay.

Storage arrangements were inspected during the visit. Petrol and diesel were stored in dedicated tanks connected to the site drainage, with fuels from the extraction process stored separately. Hydraulic oil, waste oil and antifreeze were stored in separate 1,000 litre intermediate bulk containers. Bunding was present in two locations, with an approximate capacity of 2,000 litres. Tanks and containers observed during the visit were in good condition, appropriately labelled and the bunds were free from excess liquid. Spill kits were available on site, had been recently procured and were in good order. Appropriate warning signage, including no smoking and explosion hazard signage, was present. Overall, hazardous waste storage was considered to be well maintained, with good signage and labelling. However, the general storage area used for batteries was noted to be untidy. Mr Edwards explained that their battery export process was experiencing issues, which had allowed the volume of batteries on site to grow beyond what would typically be allowed.

The site surface was observed to be in good condition and generally clear of debris at the time of the visit. The site drainage is arranged through two main drainage channels which feed into the site interceptor. The first channel captures run-off from the eastern section of the site and runs east to west, where it intersects with a second channel capturing run-off from the western section of the site. These channels then discharge directly to the interceptor. Both channels include slot drains and are supported by bunding intended to prevent run-off escaping the site during heavy rainfall. The drainage plan provided refers to a proposed ACO Q-Max drain.

Mr Edwards stated that site staff undertake maintenance of the slot drains. However, the destination of any silt, grit or sludge removed from the slot drains was not confirmed during the visit. Given that these drains receive run-off from operational areas where hydrocarbons and hazardous wastes are stored and handled, any silt, grit or sludge removed from the drainage system should be appropriately assessed, classified and consigned. This waste is likely to require classification under an absolute hazardous code, potentially 13 05 01\*. The operator should confirm where this waste is stored on site, how it is labelled, and where it is sent for recovery or disposal.

A yellow bin used for dirty granules was also observed during the visit. The bin contained spill kit materials and general site litter. If this container is intended for the storage of dirty granules or used absorbents, it should be used for that purpose only, clearly labelled, and managed as a dedicated hazardous waste container. General litter should not be placed in this container, as this may result in unnecessary mixing of wastes and could affect waste classification and onward disposal arrangements.



The site has a three-stage interceptor, which ultimately discharges via soakaway. At the time of inspection all three interceptor chambers were covered by battery boxes. The third chamber had been sealed following wire melting from waste metals during a warm period in the week prior to the visit. The interceptor is set significantly below the site working surface, with the chamber approximately 10 feet below ground level. Access to the interceptor chambers was

restricted by dirt and debris around the manhole covers, indicating that access for inspection and maintenance had been limited.

On inspection significant oil and hydrocarbon contamination was observed in all three chambers of the interceptor. Oil and sludge levels were not considered acceptable, and a strong hydrocarbon odour was evident from chambers two and three. Oil filters were present, but their effectiveness was questionable given the condition of the interceptor at the time of the visit. The interceptor had last been cleaned on 13 October 2025 by OK Environmental Services. The documentation subsequently provided for this activity was a non-hazardous Duty of Care transfer note rather than a hazardous waste consignment note.

The observed condition of the interceptor is significant because the site drainage receives run-off from operational areas where hazardous wastes and hydrocarbons are stored and handled, and the interceptor discharges via soakaway. The presence of significant oil and hydrocarbon contamination in all three chambers indicates that interceptor cleaning and maintenance requires improvement. The condition of the interceptor also supports the conclusion that waste removed from the interceptor should be appropriately assessed and, where hazardous properties are present or likely, classified and consigned as hazardous waste using the relevant hazardous waste consignment note procedure.

#### **Site Report Summary**

Hazardous waste storage arrangements observed during the visit were generally suitable, with labelled containers, bunding, spill kits and appropriate warning signage in place. However, significant oil and hydrocarbon contamination was observed in all three interceptor chambers. Because the interceptor receives run-off from operational areas and discharges via soakaway, the interceptor must be cleaned and maintained effectively to reduce the risk of contaminated discharge to ground.

#### **Site Report Actions**

The operator should clean the interceptor without delay and retain evidence of the cleaning, waste classification and lawful disposal of all wastes removed. The operator should also review the routine inspection and maintenance arrangements for the interceptor and associated drainage infrastructure. The operator should also confirm the arrangements for silt, grit and sludge removed from the slot drains, including where this waste is stored, how it is classified and where it is sent for recovery or disposal. Any container used for dirty granules or used absorbents should be clearly labelled, used only for that waste stream, and kept free from general litter.

#### **Consignment Note Audit**

Following the visit, Craig Coleman wrote to Ian Lewis (Sales Manager) on 4 June 2026 requesting documentation including consignment notes for the most recent interceptor cleaning service and for the following waste streams covering Q4 2025: batteries; catalytic converters; dirty oils; dirty granules; and antifreeze. Ian Lewis responded on 8 June 2026, providing the documentation audited in this report. Consignment notes reviewed: OK Environmental Services Transfer Note 7553 (13/10/2025); CAK254/S5099 (24/11/2025); CAK254/S5100 (23/12/2025); BAYLIS/S5097 (07/10/2025); Bayliss Recovery Ltd /0645; CAS405/00820 (08/10/2024); CAS405/8bffe (16/06/2022); CAS405/3646c (20/05/2022).

The consignment note procedure is set out in the Hazardous Waste (Wales) Regulations 2005 as amended and must be followed by all parties in the waste movement.

The hazardous waste audit has been carried out:

- To measure compliance with the regulations;
- To make sure that hazardous waste is managed properly without polluting the environment or harming people's health or seriously affecting the local area;
- To make sure that registers and records, such as quarterly returns from sites that receive hazardous waste are accurate.

Our purpose was to review the company's compliance with environmental legislation and where appropriate to provide advice and guidance to assist in identifying and delivering improvements.

## Audit Findings

The main findings of the audit are set out in the following sections. These will be followed by either **Actions** or **Recommendations**.

**Actions** indicate that we are requiring you to deliver this to meet your legal obligations. In general, these will tell you what you must do, not how to do it. These are not optional, and will normally be supported by:

- a timescale, within which the action must be delivered; and/or
- Interim measures, that must be taken until such time as the action is delivered.

**Recommendations** are not themselves requirements and typically provide further advice and guidance on:

- how to deliver a required action, for example we might indicate how another company has successfully dealt with this issue;
- aspects of best practice;
- Potential improvements that reduce the risk of problems occurring in future.

### Hazardous waste premises registration

Bayliss Recovery Limited is registered as a hazardous waste premises with Natural Resources Wales under premises code CAA266. This is compliant with Regulation 21 of the Hazardous Waste (Wales) Regulations 2005.

#### 1) Hazardous Waste Consignment Note Part A

Part A was completed correctly on the notes reviewed.

#### 2) Hazardous Waste Consignment Note Part B

Part B was completed to a broadly acceptable standard. Appropriate EWC codes, waste descriptions, quantities and hazard properties were generally recorded. However, on note BAYLIS/S5097 (lead acid batteries, 07/10/2025), the SIC code appears in an unclear or incomplete format. Other notes for this waste stream correctly record SIC codes 3710 (recycling of metal waste and scrap) and 38.32 (recovery of sorted materials). Additionally, notes for dirty oils (CAS405/00820, 08/10/2024), antifreeze (CAS405/8bffe, 16/06/2022) and dirty granules/oil filters (CAS405/3646c, 20/05/2022) fall significantly outside the Q4 2025 period requested, indicating either that waste has not been moved recently or that current consignment notes are not being retained as required.

#### 3) Hazardous Waste Consignment Note Part C

Part C was completed to an acceptable standard across all hazardous waste consignment notes reviewed. Carrier names, registration numbers, vehicle registration details and carrier signatures were present across all notes. No significant issues were identified.

#### **4) Hazardous Waste Consignment Note Part D**

On consignment note CAK254/S5099 (lead acid batteries, 24/11/2025), Part D records the consignor's identity solely as "AS IN A2" alongside a signature, without a printed name. Under Regulation 35 of the Hazardous Waste (Wales) Regulations 2005, it is a legal requirement that the consignment note be fully completed, including the printed name of the consignor in addition to their signature. The omission of the printed name constitutes a non-compliance with the Regulations. On the remaining notes reviewed, consignor names were generally present, although legibility varied.

The operator is reminded that full, legible consignor names are required on all consignment notes to ensure accountability and traceability of hazardous waste movements.

#### **5) Hazardous Waste Consignment Note Part E**

Part E was present and completed across all hazardous waste consignment notes reviewed. Quantities received, EWC codes, waste management operation codes, consignee details and signatures were generally recorded. No significant issues were identified with Part E across the notes reviewed.

#### **6) Consignee Return Data**

Not assessed.

#### **Consignment Note Summary**

This audit focused on the compliance of Bayliss Recovery Limited with the Hazardous Waste (Wales) Regulations 2005, following a site inspection on 2 June 2026 as part of NRW's targeted interceptor project.

The most significant non-compliance identified is the use of a non-hazardous Duty of Care transfer note for the removal of interceptor waste. Given the degree of oil and hydrocarbon contamination observed on site, this waste should be classified as hazardous (EWC 13 05 06\* or similar) and documented using a Hazardous Waste Consignment Note under Regulations 35 and 36 of the HWR 2005. The existing note is further deficient in its description of the waste, use of an incorrect company name, and expression of quantity in gallons rather than kg. Additional non-compliances identified include: a missing consignor printed name in Part D of note CAK254/S5099; an unclear or incorrect SIC code on note BAYLIS/S5097; and outdated documentation for the dirty oils, antifreeze and dirty granules/oil filters waste streams. The operator should undertake a thorough review of their hazardous waste documentation processes to ensure all future movements of hazardous waste are fully compliant with the Hazardous Waste (Wales) Regulations 2005.

#### **Consignment Note Actions**

To achieve full compliance with the Hazardous Waste (Wales) Regulations 2005 the operator should:

Review procedures for the completion of hazardous waste consignment notes to ensure all sections are completed accurately and in full for every movement of hazardous waste. Immediately ensure that all future interceptor cleaning operations are documented using Hazardous Waste Consignment Notes (Parts A–E) in accordance with Regulations 35 and 36 of the HWR 2005, with waste classified under the appropriate hazardous EWC code (e.g. 13 05 06\*), fully described, and quantities expressed in kg, using the correct registered name (Bayliss Recovery Limited). Review and improve the completion of Part D on all notes to include the full printed name of the consignor alongside their signature. Review SIC codes across all notes to ensure accuracy; SIC 38320 (recovery of sorted materials) and SIC 3710 (recycling of metal waste and scrap) are both appropriate for the Bridgend site. Ensure consignment notes for hazardous waste arisings at the Bridgend site record the Bridgend

address and premises code (CAA266). Ensure current and up to date consignment notes for all hazardous waste streams are retained on site and available for inspection at all times in accordance with HWR 2005 record keeping requirements. Implementing these measures will strengthen duty of care, reduce regulatory risk, and ensure full compliance with hazardous waste legislation.

Please note, all actions relevant to your site permit will be passed on to your site regulatory officer and this is something they may wish to follow up further with you on their next site inspection.

If you have any questions about the contents of this report, please do not hesitate to contact me.

Regards,

Craig Coleman

Hazardous Waste Regulation Officer E-mail: craig.coleman@cyfoethnaturiolcymru.gov.uk

In this document 'Natural Resources Wales means the Natural Resources Body for Wales established by Article 3 of the Natural Resources Body for Wales (Establishment) Order 2012.

**Section 3-Enforcement Response** **Only one of the boxes below should be ticked**

You must take immediate action to rectify any non-compliances noted in section 1 and prevent repetition. Non-compliance with environmental legislation may result in enforcement action being taken, including criminal prosecutions. Please read the detailed assessment in Section 2 and the steps you need to take in Section 4 below.

|  |   |
|--|---|
| Other than the provision of advice and guidance, at present we do not intend to take further enforcement action in respect of the non-compliance identified above. This does not preclude us from taking enforcement action if further relevant information comes to light or advice isn't followed. | X |
| We will now consider what enforcement action is appropriate and notify you, referencing this form.   |   |

#### Section 4- Action(s)

Where non-compliance has been identified in section 1 this section summarises the steps you need to take to return to compliance and also provides timescales for this to be done.

| Non-compliance identified  | Action Required / Advised  | Due Date                                    |
|--|--|---|
| Destination and classification of silt, grit or sludge removed from the slot drains was not confirmed.   | Confirm where slot drain arisings are stored, how they are classified, and where they are sent for recovery or disposal. Waste removed from the drainage system must be appropriately classified and consigned.  | Within 28 days of this report               |
| Dirty granules container contained spill kit materials and general site litter.  | Ensure any container used for dirty granules or used absorbents is clearly labelled, used only for that waste stream, and managed in line with its waste classification.   | Immediate                                   |
| Significant oil and hydrocarbon contamination observed in all three interceptor chambers.  | Clean the interceptor and retain evidence of cleaning, waste classification and lawful disposal. Review routine inspection and maintenance arrangements.   | Within 28 days of this report               |
| Interceptor waste removal documented using a non-hazardous Duty of Care transfer note (OK Environmental Services Transfer Note 7553) rather than a Hazardous Waste Consignment Note (Parts A–E).                             | Ensure all future interceptor cleaning operations are documented using a Hazardous Waste Consignment Note under Regulations 35 and 36 of the HWR 2005.<br><br>Waste must be classified under the appropriate hazardous EWC code (e.g. 13 05 06*), fully described, and quantities expressed in kg. The correct registered name (Bayliss Recovery Limited) must be used on all documentation. | Immediate / before next interceptor service |
| Inconsistencies were identified in the completion of hazardous waste consignment notes, including a missing printed consignor name in Part D of note CAK254/S5099 and an incorrect or unclear SIC code on note BAYLIS/S5097. | Ensure all hazardous waste consignment notes include the full printed name of the consignor alongside their signature, in compliance with Regulation 35 of the HWR 2005.   | Immediate                                   |
|  | Review SIC codes across all consignment notes to ensure accuracy and consistency. SIC 38320 (recovery of sorted materials) and SIC 3710 (recycling of metal waste and scrap) are appropriate for the Bridgend site's activities.   | Immediate                                   |

#### Section 5 - Compliance notes

To ensure you correct actual or potential non-compliance we may

- λ advise on corrective actions verbally or in writing
- λ require you to take specific actions in writing
- λ issue a notice

Non-compliance with environmental legislation is an offence and we may take legal action against you.

λ We will normally provide advice and guidance to assist you to come back into compliance either after an offence is committed or where we consider that an offence is likely to be committed. This is without prejudice to any other enforcement response that we consider may be required.

λ Enforcement action may include the issue of a formal caution or prosecution.

λ Dependent upon the type of offence committed, a civil sanction Enforcement Undertaking (EU) offer may also be available to you as an alternative enforcement response.

**See our Enforcement and Civil Sanctions guidance for further information**

**Not all legal requirements were assessed as part of this audit. It remains your responsibility to ensure that you comply with all relevant environmental legislation and maintain suitable records to evidence your compliance.**

## **Section 6 – General Information**

### **Data protection notice**

The information on this form will be processed by Natural Resources Wales to fulfill its regulatory and monitoring functions. Natural Resources Wales may also use and/or disclose it in connection with:

- λ offering/providing you with its literature/services relating to environmental matters
- λ consulting with the public, public bodies, and other organisations (e.g., Health and Safety Executive, local authorities) on environmental issues
- λ carrying out statistical analysis, research and development on environmental issues
- λ investigating possible breaches of environmental law and taking any resulting action
- λ preventing breaches of environmental law
- λ assessing customer service satisfaction and improving its service
- λ Freedom of Information Act/Environmental Information Regulations request.

Natural Resources Wales may pass it on to its agents/representatives to do these things on its behalf. You should ensure that any persons named on this form are informed of the contents of this data protection notice.

### **[Customer charter](#)**

#### **What do I do if I disagree with the report or have a complaint?**

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.