

Compliance Assessment Report

Report ID:
CAR_NRW0035982

This form will report compliance with your permit as determined by an NRW officer

Site	Bayliss Metals	Permit Ref	BB3192FJ		
Operator/Permit holder	Bayliss Recovery Limited				
Regime	Waste Operations				
Date of assessment	13/11/2019	Time in	11:30	Out	12:00
Assessment type	Audit				
Parts of the permit assessed	infrastructure, staff training.				
Lead officer's name	Thomas, Ffion				
Accompanied by					
Recipient's name/position	Ian Lewis/ Environment manager	Date issued	22/11/2019		

Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations or the licence under the Water Resources Act 1991 as amended by the Water Act 2003. A detailed explanation is captured in "Compliance Assessment Report Detail" (Section 2) and any actions you may need to take are given in the "Action(s)" (section 4). This summary details where we believe any non-compliance with the permit has occurred, the relevant condition and how the non-compliance has been categorised using our Compliance Classification Scheme (CCS). CCS Scores can be consolidated or suspended where appropriate, to reflect the impact of some non-compliances more accurately. For more details of our CCS scheme, contact your local office.

Permit conditions and compliance summary	CCS Category	Condition(s) breached
B1 - Infrastructure - Engineering for prevention and control of emissions	A	
C1 - General Management - Staff competency/training	A	
C2 - General Management - Management system and operating procedures	A	
C4 - General Management - Storage, handling labelling and Segregation	A	

KEY: See Section 5 for breach categories, suspended scores will be indicated as such.

A = Assessed or assessed in part (no evidence of non-compliance), **X** = Action only,
O = Ongoing non-compliance, not scored.

Number of breaches recorded	0	Total compliance score (see section 5 for scoring scheme)	0
-----------------------------	---	---	---

If the Number of breaches recorded is greater than zero, please see Section 3 for our proposed enforcement response

Section 2 – Compliance Assessment Report Detail

This section contains a report of our findings and will usually include information on:

- The part(s) of the permit that were assessed (eg. Maintenance, training, combustion plant, etc)
- Where the type of assessment was 'Data Review' details of the report/results triggering the assessment
- Any non-compliances identified
- Any non-compliances with directly applicable legislation
- Details of any multiple non-compliances
- Information on the compliance score accrued inc.
- Details of advice given
- Any other areas of concern
- Any actions requested
- Any examples of good practice
- A reference to photos taken

This Compliance Assessment Report (CAR) form has been completed following the site inspection undertaken on the 13th November 2019 of the Bayliss Recovery, Bridgend site, permit number EPR BB3192FJ

The inspection was planned and pre-arranged. Ffion Thomas met with Ian Lewis, Environment Manager, who accompanied during the inspection.

The permit allows for metal recycling storage and treatment as well as depollution of end of life vehicles.

Site walk over:

Since the first site inspection following the permit issued in February 2019 the site has constructed a building and are in the process of receiving the required plant and equipment to build an ELV de-pollution bay. No de-pollution is occurring at present and no ELV's are stored on site. At the time of the inspection 2 of the waste fluids holding tanks were delivered. These are bunded tanks. The operators are reminded that the ELV regulations will apply when this activity commences.



The building was currently being used for the hand sorting, sizing and segregation of cables (non ferrous metal recycling)

The site impermeable pavement is in good condition and the drainage system appeared to be free flowing with no standing water or blocked drains on site.

For the Bayliss Bridgend site there is a Fire Prevention management plan that was accepted by NRW at permit determination. The plan required the segregated storage bays to be constructed to prevent fire passing through the bay walls, which are constructed of "legio block" style concrete blocks. These bays were in good condition with no signs of deterioration nor damage. If damage occurs to an individual block the construction design allows for its replacement without compromising the entire wall.

During the inspection staff training records and the companies training scheme were audited. Bayliss recovery hold a management system that is externally audited by the Green Dragoon accreditation. Under this management system they have staff training (included in section 11 of the EMS) The environmental training package of the management system includes a section on the aspects of pollution relevant to the activities and operations on site. It also provides an understanding of what relevant environmental legislations apply, an understanding of the EPR permit and what they are, and also what the sites EMS covers and is. The training also covers hazardous waste identification.

The training is role specific and delivered via staff reading the relevant sections of the training programme. They then must complete a question sheet that tests their understanding of the items they have just read, e.g the removal and storage of batteries form ELV's. This test sheet is signed off if passed/completed and ensures that a complete understanding of the materials has been obtained and the knowledge to undertake given roles has been achieved.

The training is always undertaken as part of the initial staff induction to new starters but is then repeated via yearly review. All of which are recorded and saved under the EMS and training schedules.

The management systems assessed and operated by Bayliss Recovery are of a high standard. No non compliances were identified at the time of this inspection.

I thank you for your time.

End

EPR Compliance Assessment Report

**Report ID:
CAR_NRW0035982**

This form will report compliance with your permit as determined by an NRW officer

Site	Bayliss Metals	Permit Ref	BB3192FJ
Operator/Permit holder	Bayliss Recovery Limited	Date	13/11/2019

Section 3 – Enforcement Response

You must take immediate action to rectify any non-compliance and prevent repetition. Non-compliance with your permit conditions constitutes an offence and can result in criminal prosecutions and/or suspension or revocation of a permit. Please read the detailed assessment in Section 2 and the steps you need to take in Section 4 below.

Section 4 – Action(s)

This section summarises the actions identified during the assessment along with the timescales for when they will need to be completed.

Criteria Ref.	CCS Category	Action required/advised	Due Date
See Section 1 above			

Section 5 – Compliance notes for the Operator

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

- Advise on corrective actions verbally or in writing
- Require you to take specific actions verbally or in writing
- Issue a notice
- Require you to review your procedures or management system
- Change some of the conditions of your permit
- Decide to undertake a full review of your permit

Any breach of a permit condition is an offence and we may take legal action against you

- 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.
- Enforcement action can include the issue of a formal caution, prosecution, the service of a notice and/or suspension or revocation of the permit.

See our Enforcement and Civil Sanctions guidance for further information

This report does not relieve the site operator of the responsibility to

- Ensure you comply with the conditions of the permit at all times and prevent pollution of the environment
- Ensure you comply with other legislative provisions which may apply

Non-compliance scores and categories

CCS category	Description	Score
C1	A non-compliance that could have a major environmental effect	60
C2	A non-compliance which could have a significant environmental effect	31
C3	A non-compliance which could have a minor environmental effect	4
C4	A non-compliance which has no potential environmental effect	0.1

Operational Risk Appraisal (Opra) - Compliance assessment findings may affect your Opra score and/or your charges. This score influences the resource we use to assess permit compliance.

Section 6 – General information

Data protection notice

The information on this form will be processed by the Natural Resources Wales (NRW) to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s). The NRW may also use and/or disclose it in connection with:

- Offering/providing you with its literature/services relating to environmental matters
- Consulting with the public, public bodies and other organisations (eg. 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 its service
- Freedom of Information Act/Environmental Regulations request

The NRW 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.

Disclosure of information

The NRW will provide a copy of this report to the public register(s). However, if you consider that any information contained in this report should not be released to the public register(s) on the grounds of commercial confidentiality, you must write to your local area office within fifteen working days of receipt of this form indicating which information it concerns and why it should not be released, giving your reasons in full.

Customer charter

What can I do if I disagree with this compliance assessment report?

If you are unable to resolve the issue with your site officer, you should firstly discuss the matter with officer's line managers using the informal appeals procedure. If you wish to raise your dispute further through our official Complaints and Commendations procedure, phone our general enquiry number 0300 065 3000 (Mon to Fri 08.00 – 18.00) and ask for the Customer Contact team or send an email to enquiries@naturalresourceswales.gov.uk. If you are still dissatisfied you can make a complaint to the Public Services Ombudsman for Wales. For advice on how to complain to the Ombudsman phone their helpline on 0845 607 0987.

Welsh Language

If you would like this form in Welsh please contact your Regulatory Officer.