

Compliance Assessment Report CAR_NRW0037099

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 19/10/2020 between 11:00 and 12:30.
Parts of permit assessed: Part of permit assessed

NRW Lead Officer: Craig Coleman, accompanied by Eleanor Davies.
Report sent to: Ian Lewis, Environment Manager on 09/11/2020.

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)	
C2 - General Management - Management system and operating procedures	Assessed (A)	
C4 - General Management - Storage, handling labelling and Segregation	Assessed (A)	
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?

No action required.

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

Bayliss Recovery Ltd Site Visit, Tremorfa Industrial Estate, Cardiff, (EPR/WB3893HZ) – 19/10/2020

Hazardous Waste Officer Craig Coleman, and Senior Hazardous Waste Officer Eleanor Davies visited the Bayliss Recovery Ltd facility in Tremorfa, Cardiff; on 19/10/2020 to undertake a site inspection to assess compliance with the sites Environmental Permit (EPR/ WB3893HZ), and to assess the sites compliance with The Hazardous Waste (England and Wales) Regulations 2005. The weather on the day of the inspection was good, with no precipitation and low wind speed. The site is a hub for smaller scrap and ELV operators in the area to bring in their metals and batteries, and as such the site sees a large amount of throughflow of metals and waste batteries. Due to the low number of ELV's currently being accepted it was not possible to undertake a depollution check during this site visit. We were greeted by Mr Ian Lewis, the Environment Manager for Bayliss Recovery Ltd who accompanied us on our site inspection.

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

The site benefits from an impermeable surface that spans the whole of the facility. The floor surface is in good condition which prevents any surface water from the site from percolating into the ground water. The site has an ACO drain which feeds into a three-chamber interceptor. The interceptor and drainage infrastructure on site are in good condition having been cleaned on 26/03/2020.

(B4) Containment of stored materials:

As mentioned above, the site is a hub within the Cardiff area for smaller waste operations to sell collected scrap metals, ELV shells, car batteries and other appropriate material. The waste is deposited in the yard and sorted in to two distinct piles - Ferrous and non-ferrous. The waste piles on site, though large did not appear to be excessive and they are well separated into their types before treatment. More valuable non-ferrous metals are weighed and stored in an indoor facility.

All batteries accepted on to site are kept within the indoor facility within battery boxes before being shipped on to one of several recyclers for processing.

The vehicle shells stored on site were low in number, these were stored away from the other waste metals kept on site. Most of the ELV's were stored singularly, but a few were stacked. Where the ELV's had been stacked the stacks did not exceed two cars in height. All vehicles currently being stored on site appear to have been there for a short period of time.

All fluids that are extracted from end of life vehicles are stored within separate bunded containers. Oils are stored in a large double bunded tank housed at the rear of the depollution bay. Other waste fluids extracted during depollution such as anti-freeze and anti-freeze are stored in a sperate container which again is double bunded and stored to the side of the building.

Oil filters are extracted, with the oil being drained out of them and the filters being consigned to barrel which is marked as hazardous waste.

Tyres collected from the ELV's are deposited into a large container and are transferred in bulk to an authorised site.

Catalytic converters extracted are maintained uncrushed on site and are sold in bulk. The converters are held in a secure location until they are sold on for recycling to an authorised site.

(C1) Staff competency and training:

The Technically Competent Manager for the site is Mr Ian Lewis and his continuing competency is valid through to 02/22.

(C2) Management Systems:

The sites Environmental Management System (EMS) is available for access in the site office.

(C4) Storage, Handling, Labelling and Segregation:

All waste was well segregated and stored appropriately. As mentioned in B4 all the ELV shells were stored correctly, wastes such as oils and other pollutants had well defined and maintained areas for their storage. Hazardous wastes were not mixed with non-hazardous wastes and all areas were clearly labelled as to what was stored there.

(D1) Site security:

The site is secured by a boundary fence and a manual gate which is closed and locked when the site is closed. The fencing and gate, which are substantial, were all in a good state of repair during the site visit. The site has high definition CCTV and thermal monitoring, which is monitored through non-operation periods by a security firm.

Hazardous Waste Inspection:

Operator: Bayliss Recovery Ltd

Hazardous Waste Registration: CAJ698

As highlighted in the CAR form above, hazardous wastes that are derived as part of the depollution process undertaken on site, namely motor oils (13 02 XX) and break fluids (16 01 13*) are stored in adequate containment units prior to their removal from site by an authorised waste transfer business. Anti-freeze (16 01 04*) and radiator fluid (16 10 XX) are collected by by an authorised waste transfer business.

Batteries (16 06 XX) removed as part of the depollution process are stored in a bunded container that is resistant to acid corrosion. The container is clearly marked as a battery bin. Part of the sites business is to act as a hub for batteries from small scale ELV centres in the area. These are bulked safely on site until they are shipped on to an authorised waste operator.

The catalytic converters (16 01 21*) are bulked up and and stored securely until they are taken for recycling and smelting at an authorised waste operator.

Tyres (16 01 03) that are generated as a result of the activities on site are stored in a safe condition in a large container until collection by an authorised waste operator.

Mr Ian Lewis is the TCM for the site and holds an up to date WAMITAB certification. The site has an EMS available for staff to access in the event of an environmental emergency and all staff have been trained to this document.

The site has good waste segregation and labelling with no mixing between hazardous and non-hazardous

waste, or hazardous waste types.

Consignment notes were available for inspection upon request. Of the notes inspected there was an error with the collection time being incorrect.

Additional Comments:

During the site visit we discussed the increase in criminal activity in the metals sector, particularly around catalytic converters. Mr. Lewis noted that the site typically only deals with ELV centres and local garages for catalytic converters. All waste incoming on to site is photographed by the one site weighing system, and all transactions are handled electronically as the site does not deal in cash. Mr. Lewis is aware of the increase in the sale of stolen catalytic converters and will note any vehicles which bring them on site in an attempt to sell them and pass this information on to NRW.

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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.

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.