

Compliance Assessment Report CAR_NRW0041973

Permit being assessed: NP3099FS.

For: Harp International Limited Gellihirion Hazardous Waste, held by Harp International Ltd
At: Gellihirion Hazardous Waste, Reclamation and Storage Facility, GelliHirion Industrial Estate, Pontypridd, Rhondda Cynon Taff, CF37 5SX.

Type of assessment carried out: Audit, Reason: Routine.

On 08/06/2023 between 10:00 and 12:00.

Parts of permit assessed: Site inspection / Audit of Accident management plan and Energy efficiency requirements

NRW Lead Officer: Dale Padfield.

Report sent to: Caroline Harries, Quality & Environmental Manager on 13/06/2023.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
D2 - Incident Management - Accidents, emergency and incident planning	Assessed (A)	
H2 - Resource Efficiency - Energy efficiency	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
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

Harp international Ltd

EPR/NP3099FS

This compliance assessment report (CAR) details an audit of Harps accident management plan and the implementation of improvement condition four which relates to BAT conclusion 23 'energy efficiency'. The audit focused primarily on a desktop review of Harps procedures, with a follow up site visit conducted on the 8th of June 2023. The assessment of waste returns for Quarter 1 (January to April) 2023 are also included.

Accident management plan

Section six of Harps environmental management system details the accident management plan, whereby the potential incidents that may have an environmental impact have been identified. There are three main areas that could pose a negative environmental impact which are, leakages of gas, spillages of fluids and fires. Harp have identified the consequences of these incident, quantified the risk of such events occurring and have identified measures to minimise this risk, overall risk posed to the environment from the installation is considered low.

Leakages of gas

To minimise the risk of gas leaks Harp conducts regular testing of pressure receptacles and hoses to BS standards. A selection of test certificates were seen in the laboratory during the visit. The gas cylinders are tracked throughout their 10-year lifespan, Harp has a system in place that provides notification of when cylinders are due a service, cylinders are segregated for testing, if they fail inspection they are sent for disposal and destruction certificates are issued.

A copy of Harps 'Planned maintenance register' was received for equipment due maintenance in May 2023. The register provides details on the equipment type, refence number, description, physical location, serial number, maintenance frequency and date of last/next service.

During the site inspection one of the bulk storage tanks was seen to be undergoing a full service. During this maintenance activity the tank is completely emptied, and internal and external inspection are conducted. The work is undertaken by an external contractor with robust permit to work procedures in place.

Harps 'IMS Procedure No. 10, Emergency preparedness and response' document details the procedure to deal with a gas leak on the filling line.

During the visit it was enquired if there are any other areas on site where leaks could occur. Harp stated that leaks could potentially occur in storage / bulk storage, such as leaks arising from pressure release valves etc. Checks for leaks are conducted by staff and are usually detected by sound. Oxygen sensors are present throughout the facility to detect and notify of any large leaks.

Harp has procedures in place to identify, learn and respond to incidents. Evidence of this being implanted was provided from Harp in the form of investigation report '2020-02 cylinder noticed to be light'. The report details that an employee noticed a cylinder to be lighter than expected suggesting it had leaked. The investigation found that a member of staff had incorrectly applied heat wrap and valve closure. The root cause was identified as the member of staff not following the set procedures, which resulted in the re-checking of 350 cylinders that had been handled by the same employee. To ensure no further occurrences, Harp put in place

a system of checks and supervision. Such incidents are discussed within the SEQ meeting, the minutes of which were also seen, which evidenced the discussion of the incident and follow up actions. Harp has robust procedures in place to ensure incidents are investigated, root causes are sought and are acted upon.

Spillages.

To minimise the risk of spillages, particularly oil, Harp stores all liquids on bunded pallets and pumps / equipment are held on drip-trays where required. In the event that a spill does occur, Harp has numerous spill kits and drain blockers located throughout site, the site has impermeable surface throughout which appeared to be in good condition during the site inspection. Harps has a procedure for dealing with spillages 'work instruction No.38. Within the 'IMS Procedure No. 10' document Harp also state that annual spillage training is held, including a spillage drill.

A drainage plan for the site is held within the emergency 'fire grab pack'. Drains have been painted to allow easy identification although the paint has faded on some of the drain covers. Harp should consider re-painting the faded drain covers as this may allow easy and quick identification during an incident.

A spill kit checklist is utilised by the site, detailing the contents of the spill kits, and numerous spill kits were witnessed across the site.

Harp have had the concrete bund demolished and the area has been turned into a fenced off banking. The bund was found to be defective in 2022, the site's oil storage requirements are low, as only small quantities are generated by the reclaim process, as such Harp decided to remove the oil tank and demolish the bund. The site now stores waste oil in 205 litre drums on bunded pallets.

Fires.

Risk of fires are minimised through the correct storage of flammable materials and by the control of ignition sources. In the event of a fire, Harp would implement several steps to minimise impact, including spraying drums and cylinders with water to prevent overheating, activation of the fire alarm automatically notifies the fire service.

Harps 'IMS Procedure No. 10, Emergency preparedness and response' document details the sites response procedure in the event of a fire, including the roles and responsibilities of personnel involved.

Harp has procedures in place for the capture and reporting of near misses and a system of 'good catches' which are described as an incident or event or condition which had the potential to cause harm to a person, property or environment but are easily correctable. These are recorded on Harps 'Document No.15' which include corrective actions and discussed at SEQ meetings as previously noted within this report.

Summary

Harp appears to have well defined procedures in place identifying areas of risk, implanting control measures to minimise risk and detailed procedures to deal with an incident should one occur. A thorough investigation procedure is in place to identify root cause and implement corrective actions to prevent and minimise further occurrences. A good state of plant and equipment is maintained through a thorough preventative maintenance programme.

Energy efficiency

As detailed in CAR_NRW0039714, to meet the requirements of improvement condition 'IC4' and comply with BAT conclusion 23, Harp had a planned improvement programme in place for 2022 with the aim of calculating the specific energy consumption of the reclaim plant, and as part of project, to create an energy balance record.

Since the last visit conducted by NRW, Harp have installed electricity sub-meters on the RDA and purger, allowing the specific energy consumption of the reclaim process to be calculated. Initially Harp began taking meter readings, however an improvement was made by logging meter readings for specific types of waste gas processed. This allowed Harp to identify an increased energy efficiency of the purger when the inert content of the gas was higher. However, Harp has no control over this variable and are unable to utilise this aspect as a means to improve the energy efficiency of the process. Harp have identified that some small energy efficiency improvements may be possible by sourcing the most efficient components when parts need replacing, which is already actively pursued.

An energy flow chart of the installation has been created, which displays the energy flows on site. It is noted that Harp do not have specific sub meters for the other activities on site and the figures are estimates based on consumption rate and use. Harp have estimated that 50% of the installation energy requirements come from the various compressor systems on site, as previously noted by Harp, the waste heat generated by the compressors is vented into the building during winter to utilise the heat. Harp has an improvement programme planned to pipe the waste heat to other areas of the facility as the heat is currently only utilised in the one building. Compressor systems and lines are subject to regular inspection and maintenance by an external company, ensuring there are no leaks, and the systems are running efficiently which ensures energy is not wasted.

During 2022 Harp discussed their intention to install solar panels on the facilities roof. This project has since suffered some setbacks due to insurance concerns and the requirement to conduct renovation works on the roof before any solar panel project could go ahead. The project is currently on hold, but Harp are hopeful this will go ahead in the future.

Summary

Energy efficiency is well monitored at the facility, although energy use at the facility is relatively modest the operator appears to continuously seek for opportunities where improvements can be made, this is also in line with their accredited EMS system.

A site walk over was conducted, which included the various internal and external operations and storage areas. The re-claim plant was seen with the new sub meter installed, however the plant was not operational during the visit. The laboratory was seen and the process for analysing the gasses explained. Harp tests all waste gas received at the installation to ensure the content has been accurately described. All reclaimed gas is then tested to ensure specific criteria are met, such as the water content etc. No non-compliances were seen during the site inspection, the site is well managed and maintained.

Quarter one (January – March) 2023 waste returns

The waste returns were received by NRW on the 24th of April 2023. All EWC codes accepted by the site are compliant with the permit, a total of 2.9681 tonnes was received by the site.

End.

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.