

## Compliance Assessment Report CAR\_NRW0043305

**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:** Report/Data Review,

**Reason:** Routine.

**On:** 31/12/2023.

**Parts of permit assessed:** Waste returns, Annual reports.

**NRW Lead Officer:** Dale Padfield.

**Report sent to:** Caroline Harries, Quality & Environmental Manager, on 02/02/2024.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR1C - Management - Energy Efficiency	Assessed (A)	
IR1D - Management - Efficient use of raw materials	Assessed (A)	
IR4B - Information - Reporting	Assessed (A)	

Result types are explained in more detail in the 'Important Information' section below.

Total 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

Permit EPR/NP3099FS

The Purpose of this compliance assessment report (CAR) is to review the quarterly waste returns for quarter four along with the annual reporting returns for 2023.

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**Quarter four 2023 Waste Returns**

The Waste returns for quarter four (October – December) 2023 were received on the 10<sup>th</sup> of January 2024. A total of 7.7321 tonnes of EWC code 140601 was received during this quarter. All wastes are complaint, and the report is accepted.

**Annual Returns**

The annual returns were received on the 26<sup>th</sup> of January 2024. Reports on the annual total for water usage, energy usage, generation of wastewater and generation of residues were received.

**Waste & Residue Generation**

A total of 20 tonnes of waste was received by the site.

Residues generated by the process are oil removed during the reclamation of the waste refrigerants and a molecular sieve that over time becomes exhausted after drying the reclaimed gasses. Exhausted molecular sieve totalled 371kg and 257kg of oil was removed in 2023. As previously stated, no performance indicator would be suitable for these parameters as Harp have no control of the quantity of oil contamination within the waste gas and the molecular sieve has a finite lifespan.

**Water Use**

No water is specifically used in the process, water is primarily used for domestic purposes. The table below shows water usage trend.

Year	Mains Water/ M3	Total Waste treated / tonnes	Staff hours	Water used per unit waste treated / M3 per Tonne of waste	Water used per Staff hour worked m3/h
2021	794	69.3	50524	11.5	0.016
2022	673	21.4	43951	31.4	0.015

<b>2023</b>	666	20	45621	33.3	0.015
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As previously stated, no water is used within the waste reclamation process, water usage on site is primarily domestic usage. However, there has been a slight decrease in water usage on site, the performance indicator of water usage per staff hour worked is stable and consistent with previous years.

### Energy Usage

The table below shows overall energy usage trends.

Year	Electricity / MWh	Natural Gas / MWh	Total Energy Used / MWh	Total Waste treated / tonnes	Energy Use per unit waste treated ~ MWh per Tonne of waste	Staff hours	Energy usage per staff hour MWh /h
<b>2021</b>	1280	128.7	1408.7	69.3	20.3	50524	0.028
<b>2022</b>	1150	142	1292	21.4	60.4	43951	0.029
<b>2023</b>	956	143	1099	20	55.0	45621	0.024

The table below shows specific activity energy usage trends

Year	Electricity / MWh	RDA Submeter / KWh	Purger Submeter KW/h	Natural Gas / MWh	Total Primary Energy Used / MWh	Total Waste treated / tonnes	Energy Use per unit waste treated ~ MWh per Tonne of waste	Energy Use per unit waste treated (Plant Submeters) ~ KWh per Tonne of waste
<b>2021</b>	1280	-	-	-	-	-	-	-
<b>2022</b>	1150	4150	1165.1	142	1292	21.4	60.4	248.4
<b>2023</b>	956	2670	667	143	1099	20	55.0	166.9

Overall, gas usage has remained stable and electricity usage has decreased on site, energy usage per staff hour worked shows a decrease on the previous years. Specific energy usage on the reclaim plant also shows a decrease, however, the sub meters were installed part-way through 2022, as such, the 2022 figure doesn't provide an accurate representation.

Overall energy efficiency appears to be increasing across the site, this may be a result of the operator's environmental commitment, as set out in their accredited environmental management system.

All annual reports are accepted.

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.

**If your assessment result in Section 1 is suspended, what does this mean?**

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 compliance criteria (used in section 1 and 2):**

**1. Management**

- IR1A – General management
- IR1B – Finance (only applicable to Landfill)
- IR1C – Energy efficiency
- IR1D - Efficient use of raw materials
- IR1E - Avoidance, recovery and disposal of wastes produced by the activities
- IR1F - Multiple operator installations

**2. Operations**

- IR2A – Permitted activities
- IR2B – The site
- IR2C – Operating techniques
- IR2D – Technical requirements
- IR2E – Improvement programme
- IR2F – Pre-operational conditions
- IR2G – Landfill engineering (only applicable to Landfill)
- IR2H – Waste acceptance (only applicable to Landfill)
- IR2I – Leachate levels (only applicable to Landfill)
- IR2J – Closure and aftercare (only applicable to Landfill)
- IR2K – Landfill gas management (only applicable to Landfill)

**3. Emission and Monitoring**

- IR3A – Emissions to water, air or land
- IR3B – Emissions of substances not controlled by emission limits
- IR3C – Odour
- IR3D – Noise and vibration
- IR3E – Monitoring
- IR3F – Pests
- IR3G – Air quality management plans
- IR3H – Monitoring for the purposes of the Industrial Emissions Directive (this heading includes Large Combustion Plants)
- IR3I – Fire

**4. Information**

- IR4A – Records
- IR4B – Reporting
- IR4C – Notification

**Enforcement response**

Any non-compliance with a permit condition 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 twenty 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 to 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.