

Compliance Assessment Report CAR_NRW0046365

Permit being assessed: HP3131KU.

For: SPTS Technologies EPR/HP3131KU, **held by:** SPTS Technologies Limited

At: SPP Process Technology Systems UK Ltd Ringland Way , Newport, South Wales, NP18 2TA.

Type of assessment: Report/Data Review,

Reason: Routine.

On: 31/12/2024.

Parts of permit assessed: 4 Reporting.

NRW Lead Officer: Luke Burton.

Report sent to: Environmental, Health and Safety Lead, Environmental, Health and Safety Lead, on 19/02/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR4B - Installations - 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

This Compliance Assessment Report (CAR) has been produced following the submission and assessment of operator reporting in accordance with section 4 of the permit.

Permit NP3033BM is a bespoke, tier 2, Part A “low impact installation”. An installation which, in the opinion of Natural Resources Wales, cannot result in emissions or there is no likelihood that it will result in emissions except in a quantity which is so trivial that it is incapable of causing pollution or its capacity to cause pollution is insignificant.

The qualifying criteria for a “low impact installation”, at the date of issuing this CAR, is set out on the following Natural Resources Wales webpage: [Natural Resources Wales / Find out if your installation qualifies for a low impact Environmental Permit](#)

The qualifying criteria is partially reproduced below:

Low impact installations must not:

- release more than 50 cubic metres per day of waste water
- have to use equipment to reduce or remove emissions before they’re released into the outside environment
- discharge emissions to groundwater
- produce more than 1 tonne of waste or 10kg of hazardous waste per day, averaged over a year, with not more than 20 tonnes of waste or 200kg of hazardous waste being produced in any one day
- consume energy at a rate greater than 3 megawatts (MW) or, if the installation uses a combined heat and power installation to supply any internal process heat, 10MW (through both imported electricity and by burning fuel on site)

Low impact installations must have:

- containment measures to prevent emissions escaping to surface water, sewer or land, which are maintained at all times
 - only a low risk of causing offence due to noise and odour. [The site] cannot qualify as a low impact installation if noise and odour are noticeable outside the boundary of [the] site.
-

Condition 4.1.2 of the permit states:

The Operator shall, unless otherwise agreed in writing, submit reports of the monitoring and assessment carried out in accordance with the conditions of this permit, as follows:-

4.1.2.1 in respect of the parameters specified in Table S2 to Schedule 2;

4.1.2.2 for the reporting period specified in Table S2 to Schedule 2 and using the form

specified in Table S3 to Schedule 3;

4.1.2.3 giving the information from such results and assessments as may be required by the form specified in those Tables; and

4.1.2.4 to the Agency within 28 days of the end of the reporting period.

Table 2 to Schedule 2 is partially reproduced below.

Table S2: Reporting of monitoring data			
Parameter	Emission point	Reporting period	Period begins
Compliance with Low Impact Installation criteria	Installation	Annual	01/01/05

Table S3 to Schedule 3 is partially reproduced below.

Table S3: Reporting Forms		
Media / parameter	Form Number	Date of Form
Compliance with Low Impact Installation criteria	L1	08/02/05

Report(s) for condition 4.1.2 were submitted via email on 14/01/2025.

The report(s) submission was made inside the reporting window which represents compliance with the environmental permit.

The report(s) submitted include the parameters specified in Table S2 to Schedule 2; which represents compliance with the environmental permit.

The report(s) submitted are for the reporting periods specified in Table S2 to Schedule 2; which represents compliance with the environmental permit.

The report(s) have been submitted using the forms specified in Table S3 to Schedule 3 which represents compliance with the environmental permit.

The report(s) submitted for condition 4.1.2 have been reviewed and demonstrate that the operator meets the “low impact installation” qualifying criteria referenced above.

The permit was issued in 2005 under "the PPC Regulations". Natural Resources Wales suggest the permit is updated to a modern, Environmental Permitting Regulations format. For this an application to vary your permit will need to be made. The application is likely to be a minor technical variation.

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 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.