Compliance Assessment Report CAR_NRW0053170

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: Site Inspection,

Reason: Routine.

On: 06/10/2026 between 09:15 and 13:00.

Parts of permit assessed: 1.0, 3.0, 4.0.

NRW Lead Officer: Richard Taylor.

Report sent to: Quality & Environment Manager, Quality & Environment Manager, on 07/10/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR1A - Installations - Management - General Management	Assessed (A)	
IR2B - Installations - Operations - The site	Assessed (A)	
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	Assessed (A)	
IR4A - Installations - Information - Records	Assessed (A)	
IR4B - Installations - Information - Reporting	Assessed (A)	
IR4C - Installations - Information - Notification	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

NRW Compliance Inspection, Tuesday 6th October 2026 10am-1pm

Operator: Harp International Limited Site:
Gellihirion Hazardous Waste Reclamation and Storage Facility
Permit: EPR/NP3099FS

1. Introductions and Health & Safety brief. There were no declared or noticeable changes to the plant operation, and the permit remains in place and representative of site activities. The site keeps a log register of any incidents such as accidental releases and uses this for reporting purposes. The site has not received any complaints from members of the public.

2. Permit Conditions governing releases to air. Permit Condition 4.3: Notifications We examined the current system of reporting FGAS releases to NRW. Under this permit condition, NRW must be notified of specified incidents, permit breaches, significant pollution events, operational changes and other matters within prescribed timescales.

The central tenet of the site inspection was to clarify the position on current legislation and guidance from NRW and the Environment Agency regarding the regulation of FGAS releases to atmosphere. As this is currently an area of development within the UK regulators, and the Environment Agency which regulates English sites, has drafted guidance on scoring FGAS's for its Officers, it was necessary to ensure Harp are primed for any changes which may be adopted by NRW, and ensure current reporting of accidental releases under the EPR regulations is standardised.

The site's methodology for reporting accidental/unplanned releases was gone through. Currently permit conditions require the site to report accidental or unintended releases to air which are 'significant'. However, what is deemed to be significant is not specified within EPR or any legislation. Therefore, it was necessary to standardise the releases in line with likely changes which may be brought in by NRW if it adopts Environment Agency draft guidance.

In summary, with immediate effect, the site has been instructed to report to NRW any releases which are calculated to be greater than 250 tonnes of CO2 equivalence per month (250 CO2e pm). The 250t CO2e pm mark is the point at which the EA draft guidance is

given as a minor environmental effect and indicates this to be a Category 3 breach of EPR permit conditions. Note, site already reports its annual losses via the PRTR reporting system, so any accidental releases are quantified and reported as annual totals. However, this is an additional requirement for site to meet its EPR permit conditions and is within a tighter timeframe as opposed to year to year submissions. Any releases over 250 tCO2e pm are to be reported via a schedule 5 notification under section 4 of the permit. It is recommended that a standard conversion factor is used when reporting. Site are recommended to use the official Gov.uk methodology when calculating and reporting FGAS losses to NRW via a schedule 5 reporting form.

https://www.gov.uk/guidance/calculate-the-carbon-dioxide-equivalent-quantity-of-an-f-gas#example-calculation

This will ensure that site figures are aligned for auditing purposes.

Action: Site to report any emissions to atmosphere with >250tCO2 e per month via the permit schedule 5 reporting procedure.

3. Site Tour The site was noticeably clean and tidy both inside and out with well managed waste segregation areas. No excess noise, dust, odour, invasive species, or vermin were seen, although it was noted that there are a number of rodent traps set on the perimeter. The site sits on a concrete reinforced pad which was in good condition without any visible repairs necessary. On the external tour it was noted that the larger pressure vessels are under a well-managed NDT cycle.

1 x tonne 'Chinese' containers - There were perhaps x50 or so smaller 'Chinese' 1 tonne vessels on site, inside and outside exposed to the elements. Some were stacked x3 on top of each other which were showing signs of external rust. One was dated at 2015. No NDT regime is in place for these, however Harp routinely replaces the seals and filling caps for these on arrival which reduces the risk of leakage.
It was queried whether there is a management rule or risk assessment in place to ensure the integrity of these tanks so they can be replaced or repaired, and whether this would be based on their age/condition/ or a physical/visual inspection. It was agreed that Harp would look into this and develop a system for ensuring these vessels are risk assessed for integrity.

Action: Harp to develop a system of timely inspection/replacement of the 'Chinese' 1 tonne vessels to ensure integrity and lower the risk of leakage from old/damaged/corroded vessels.

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 required for the permit condition assessed to avoid non-compliance. No non-compliance scored at this time
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(1) – Emissions to water
- IR3A(2) – Emissions to air
- IR3A(3) – Emissions to 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.

Disputing the Content of this Compliance Assessment Report Form
If you disagree with the content of this Compliance Assessment Report form, you should submit your concerns, in writing, to the regulating officer who issued it within **15 working days** of its issue. This will be treated as a **Stage 1 review**.

If you are not satisfied with the outcome of the stage 1 review, you may request a **Stage 2 appeal**. This request must be submitted **within 21 working days** of receiving the response from the stage 1 review.

Further details on our review and appeal process are available at: Natural Resources Wales / Appeal a regulatory decision from Natural Resources Wales

Concerns Not Related to the Content of this Compliance Assessment Report Form
If your concerns do not relate to the content of the Compliance Assessment Report form, you should first attempt to resolve the issue with the regulating officer or their line manager.

If the issue remains unresolved, please contact our **Customer Contact Team**:

- **Telephone**: 0300 065 3000 (Monday to Friday, 09:00–17:00)
- **Email**: enquiries@naturalresourceswales.gov.uk

They will provide details on how to escalate your concerns through our **Complaints and Commendations procedure**.

If you are dissatisfied with our response, you may contact the **Public Services Ombudsman for Wales**:

- **Telephone**: 0300 790 0203
- **Email**: 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.