

**This form will report compliance with your permit as determined by an NRW officer**

Site	Harp International Limited	Permit Ref	NP3099FS		
Operator/Permit holder	Harp International Ltd				
Regime	Installations				
Date of assessment	10/01/2020	Time in	10:00	Out	11:45
Assessment type	Audit				
Parts of the permit assessed	Site Inspection				
Lead officer's name	Harris, Geraint				
Accompanied by	Kemp, Andi				
Recipient's name/position	Caroline Harries/ Quality & Environmental Manager	Date issued	29/01/2020		

### Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations or the licence under the Water Resources Act 1991 as amended by the Water Act 2003. A detailed explanation is captured in "Compliance Assessment Report Detail" (Section 2) and any actions you may need to take are given in the "Action(s)" (section 4). This summary details where we believe any non-compliance with the permit has occurred, the relevant condition and how the non-compliance has been categorised using our Compliance Classification Scheme (CCS). CCS Scores can be consolidated or suspended where appropriate, to reflect the impact of some non-compliances more accurately. For more details of our CCS scheme, contact your local office.

Permit conditions and compliance summary	CCS Category	Condition(s) breached
<b>KEY:</b> See Section 5 for breach categories, suspended scores will be indicated as such. <b>A</b> = Assessed or assessed in part (no evidence of non-compliance), <b>X</b> = Action only, <b>O</b> = Ongoing non-compliance, not scored.		

<b>Number of breaches recorded</b>	<b>0</b>	<b>Total compliance score</b> (see section 5 for scoring scheme)	<b>0</b>
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**If the Number of breaches recorded is greater than zero, please see Section 3 for our proposed enforcement response**

## Section 2 – Compliance Assessment Report Detail

This section contains a report of our findings and will usually include information on:

- The part(s) of the permit that were assessed (eg. Maintenance, training, combustion plant, etc)
- Where the type of assessment was 'Data Review' details of the report/results triggering the assessment
- Any non-compliances identified
- Any non-compliances with directly applicable legislation
- Details of any multiple non-compliances
- Information on the compliance score accrued inc.
- Details of advice given
- Any other areas of concern
- Any actions requested
- Any examples of good practice
- A reference to photos taken

### **Harp International LTD**

Permit EPR/NP3099FS

Site visit and Handover 10<sup>th</sup> January 2020

The purpose of this visit was to hand regulation of the site under EPR from Andi Kemp to Geraint Harris. There was no formal agenda for the meeting as it was primarily a comprehensive site inspection.

Internally there has been an organisational restructure at NRW with the previous officer no longer regulating this facility. This meeting and inspection served as an introduction to the site and an overview of site operations, management and site layout. This physical inspection was limited to just a familiarisation and did not look in detail at the technical processes, goods and waste movements, physical infrastructure or drainage systems.

Since the last inspection the confusion over EPR Cost Recovery, Subsistence and Invoicing has been concluded.

### **Management Systems and Technical Competence**

The technical competence requirement stated in the permit (Management 1.1) is currently fulfilled by the accreditation held by Caroline Harries (CH) (WAMITAB Certificate of Technical Competence, 06592 CCC16416) and the extant certification runs from 12<sup>th</sup> Feb. 2018 – 12<sup>th</sup> Feb. 2020. Caroline was yet to book her exam slot to renew her certificate but agreed that this will be undertaken to ensure compliance after 12<sup>th</sup> February. Additionally, another employee has initiated the process of achieving the WAMITAB Certificate of Technical Competence.

The site is externally accredited to ISO 14001 and a current certification is displayed in the reception area. The site also holds accreditations to the quality standard ISO 9001, and a current accreditation to the OHAS standard ISO 18001 (which has been replaced by ISO 45001, with operators having until March 2021 to transit to the new standard). The operator is also a member of several professional trade bodies –

whether required by customers or driven by Harp themselves, membership to such organisations can help the operator keep on top of changes to and additional legislation, regulatory activity etc. Following the inspection CH emailed a number of up to date procedures: Environmental Permit Management System (issue 10 Jan. 2020), Working Plan (reviewed Jan. 2020).

### **Physical Inspection**

A brief tour led by CH was carried out for the benefit of the NRW officer. The full process flow was explained and the various packing lines, raw material bulk storage and waste storage, refrigerant recovery / treatment process, laboratory, gas sampling, cylinder storage, was looked at. The site appears to be fully served by impermeable surfaces and with gases, is unlikely to result in entry into drainage systems of lost inventory. More detailed inspection of critical environmental equipment and infrastructure will be key inspection topics going forward.

There are no plans to expand the current site boundary, However, work is being undertaken to locate an additional site for the processing and recovery of flammable gas wastes. The site currently maintains a COMAH register to ensure they don't exceed the COMAH threshold. Site was reminded to consider the COMAH regulations when planning the additional site.

### **Permit**

The EPR permit covers specific activities and areas: bulk waste storage (especially hazardous waste), waste treatment and oil storage. Certain areas, such as the bulk raw material refrigerant and raw material gas storage are not within the EPR jurisdiction. Although any relevant directly applicable environmental legislation, such as Duty of Care, hazardous waste consignments and general pollution legislation, does apply.

Site wanted confirmation that the reclaimed gas produced by onsite technology does not contribute to the onsite storage capacity limit of 150 tonnes at any one time as stated in the permit. This was confirmed and emailed to CH.

Additionally, the equipment used to reclaim a refrigerant gas for a defence contract is no longer operational and is to be returned to the owners based in England for servicing. It is understood that once fixed the machine and the process will no longer be conducted by Harp but operated by the owners in England. Harp, who are in possession of a number of gas cylinders, not treated due to the equipment malfunction, plan on forwarding them once the site in England has a permit to receive and undertake the required work.

A compliance assessment plan will be created for the site and communicated in early 2020.

Lastly the site confirm that no significant incidents, accidents, vandalism, security breaches etc. have occurred in recent times.

Quarterly results received and inspected. Results are compliant with Harp Internationals permit

**END.**

## EPR Compliance Assessment Report

**Report ID:  
CAR\_NRW0036250**

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Site	Harp International Limited	Permit Ref	NP3099FS
Operator/Permit holder	Harp International Ltd	Date	10/01/2020

### Section 3 – Enforcement Response

You must take immediate action to rectify any non-compliance and prevent repetition. Non-compliance with your permit conditions constitutes an offence and can result in criminal prosecutions and/or suspension or revocation of a permit. Please read the detailed assessment in Section 2 and the steps you need to take in Section 4 below.

Other than the provision of advice and guidance, at present we do not intend to take further enforcement action in respect of the non-compliance identified above. This does not preclude us from taking enforcement action if further relevant information comes to light or advice isn't followed.

### Section 4 – Action(s)

This section summarises the actions identified during the assessment along with the timescales for when they will need to be completed.

Criteria Ref.	CCS Category	Action required/advised	Due Date
See Section 1 above			

## Section 5 – Compliance notes for the Operator

To ensure you correct actual or potential non-compliance we may

- Advise on corrective actions verbally or in writing
- Require you to take specific actions verbally or in writing
- Issue a notice
- Require you to review your procedures or management system
- Change some of the conditions of your permit
- Decide to undertake a full review of your permit

Any breach of a permit condition is an offence and we may take legal action against you

- We will normally provide advice and guidance to assist you to come back into compliance either after an offence is committed or where we consider that an offence is likely to be committed. This is without prejudice to any other enforcement response that we consider may be required.
- Enforcement action can include the issue of a formal caution, prosecution, the service of a notice and/or suspension or revocation of the permit.

**See our Enforcement and Civil Sanctions guidance for further information**

This report does not relieve the site operator of the responsibility to

- Ensure you comply with the conditions of the permit at all times and prevent pollution of the environment
- Ensure you comply with other legislative provisions which may apply

### Non-compliance scores and categories

CCS category	Description	Score
C1	A non-compliance that could have a major environmental effect	60
C2	A non-compliance which could have a significant environmental effect	31
C3	A non-compliance which could have a minor environmental effect	4
C4	A non-compliance which has no potential environmental effect	0.1

**Operational Risk Appraisal (Opra)** - Compliance assessment findings may affect your Opra score and/or your charges. This score influences the resource we use to assess permit compliance.

## Section 6 – General information

### Data protection notice

The information on this form will be processed by the Natural Resources Wales (NRW) to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s). The NRW may also use and/or disclose it in connection with:

- Offering/providing you with its literature/services relating to environmental matters
- Consulting with the public, public bodies and other organisations (eg. 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 its service
- Freedom of Information Act/Environmental Regulations request

The NRW may pass it on to its agents/representatives to do these things on its behalf. You should ensure that any persons named on this form are informed of the contents of this data protection notice.

### Disclosure of information

The NRW will provide a copy of this report to the public register(s). However, if you consider that any information contained in this report should not be released to the public register(s) on the grounds of commercial confidentiality, you must write to your local area office within fifteen working days of receipt of this form indicating which information it concerns and why it should not be released, giving your reasons in full.

### Customer charter

#### What can I do if I disagree with this compliance assessment report?

If you are unable to resolve the issue with your site officer, you should firstly discuss the matter with officer's line managers using the informal appeals procedure. If you wish to raise your dispute further through our official Complaints and Commendations procedure, phone our general enquiry number 0300 065 3000 (Mon to Fri 08.00 – 18.00) and ask for the Customer Contact team or send an email to [enquiries@naturalresourceswales.gov.uk](mailto:enquiries@naturalresourceswales.gov.uk). If you are still dissatisfied you can make a complaint to the Public Services Ombudsman for Wales. For advice on how to complain to the Ombudsman phone their helpline on 0845 607 0987.

#### Welsh Language

If you would like this form in Welsh please contact your Regulatory Officer.