

# Natural Resources Wales permitting decisions

## Variation

The application number is: **EPR/NP3099FS/V010**

The permit number is: **EPR/NP3099FS**

The Applicant / Operator is: **Harp International Limited**

The Installation is located at: **Gellihirion Industrial Estate, Pontypridd, Rhondda Cynon Taff, CF37 5SX**

We have decided to issue the variation for Harp International Limited.

We consider in reaching that decision we have taken into account all relevant considerations and legal requirements and that the permit will ensure that the appropriate level of environmental protection is provided.

## Purpose of this document

This decision document:

- explains how the application has been determined
- provides a record of the decision-making process
- shows how all relevant factors have been taken into account
- justifies the specific conditions in the permit other than those in our generic permit template.

Unless the decision document specifies otherwise we have accepted the applicant's proposals.

## Structure of this document

- Key issues
- Annex 1 the decision checklist

## Key issues of the decision

Harp International Limited have an existing environmental permit which allows the temporary storage of hazardous waste and the treatment of refrigerant gas including distillation, separation, compression, depressurising and drying.

An application was received on 11 May 2016 to vary the permit in order to offer a disposal service for waste refrigerant oil. The application was duly made on 25 May 2016. The variation is a minor technical variation.

It is proposed that plastic containers, 10 or 20 litres in volume, will be provided to customers. When returned the containers will be segregated, weighed and the oil transferred to a bulk storage tank, pending removal from site for recovery by an appropriate contractor.

The permit already allows for the acceptance of hazardous waste and the site has the permitted capacity to store more than 50 tonnes at any one time. The overall limit of waste that can be accepted to site (2,600 tonnes) will not change as a result of this variation. Harp International have stated that a maximum storage capacity of five tonnes of waste oil will meet their initial requirement as well as allow for growth in the disposal service offered to customers. This limit has been incorporated into table S1.1 of the permit.

It is proposed that the waste oil will be stored in a new double skinned, 2000 litre storage tank, within an existing bunded storage area. The bunded area is 2.41m<sup>3</sup>, which in the event of a spill would hold 2410 litres of oil, greater than 110% of the tanks capacity.

The tank does not have the capacity to meet the storage limit that is being added to the permit. This has been discussed with the applicant. The storage will include the large tank as well as any small containers being stored prior to being emptied into the tank. An additional tank will be purchased if the amount of oil being accepted onto site becomes greater than that which the tank could hold. The limit being added to the permit is not considered to be the amount that will initially be accepted to site.

When full waste oil containers from customers are waiting to be weighed and emptied, they will be stored in cages on bunded pallets. The permit already specifies that containers must be stored on an impermeable surface with sealed drainage.

The environment management system has been updated to include acceptance and storage procedures for the waste oil. Spillage procedures and training are in place and spill kits and drain blockers are provided on site. Drainage plans are included within the sites emergency plan.

The applicant proposed that the waste oil be added to the list of authorised waste types as 13 08 99\*. 99 codes should only be used when no other code is found to be appropriate. The oils are described by the applicant as lubricating oils which fit under the codes in 13 02.

Quick guide 442\_12 for the storage and treatment of waste fridges and cooling equipment, lists the waste codes for compressor oil as 13 02 05\* and 13 02 08\*. The code suggested by the applicant has been queried internally with a senior waste advisor who agrees that 13 08 99\* is the not the most appropriate in this instance.

Although waste oil has not previously been accepted to site as a separate faction, it is a residual waste from activities carried out on site in the reclaim plant. It is intended that the waste oil drained from the reclaim plant will also be added to the storage tank. Waste returns submitted by the operator, as required by their permit, confirm the removal of 13 02 05\* (mineral-based non-chlorinated engine, gear and lubricating oils) from site.

Based on the above the decision has been made not to include 13 08 99\* in the permit. Codes from the 13 02 section of the list of waste codes will be added, specifically 13 02 05\* 13 02 08\*.

The operator has reviewed the draft permit and has agreed that these codes will be appropriate, and allow them to operate as intended. On review of the draft it was queried whether bulking up of oil should be referenced within the permit. On consideration this has been added to the *limits of specified activity and waste types* column in Table S1.1 of the permit. It is not considered that additional recovery or disposal codes need to be added as a result.

## Annex 1: decision checklist

This document should be read in conjunction with the Duly Making checklist, the application and supporting information and permit/ notice.

| Aspect considered                                             | Justification / Detail                                                                                                                                                                                                                                                                               |
|---------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Environmental Risk Assessment and operating techniques</b> |                                                                                                                                                                                                                                                                                                      |
| Environmental risk                                            | <p>We have reviewed the operator's assessment of the environmental risk from the facility.</p> <p>The operator's risk assessment is satisfactory.</p>                                                                                                                                                |
| Operating techniques                                          | <p>We have reviewed the techniques used by the operator and compared these with the relevant guidance notes.</p> <p>The proposed techniques are in line with the TGN and we consider them to represent appropriate techniques for the facility.</p> <p>See <b>key issues</b> section.</p>            |
| <b>The permit conditions</b>                                  |                                                                                                                                                                                                                                                                                                      |
| Waste types                                                   | <p>We have specified the permitted waste types, descriptions and quantities, which can be accepted at the regulated facility.</p> <p>See <b>key issues</b> section.</p>                                                                                                                              |
| Incorporating the application                                 | <p>We have specified that the applicant must operate the permit in accordance with descriptions in the application, including all additional information received as part of the determination process.</p> <p>These descriptions are specified in the Operating Techniques table in the permit.</p> |
| <b>Operator Competence</b>                                    |                                                                                                                                                                                                                                                                                                      |
| Environment management system                                 | <p>There is no known reason to consider that the operator will not have the management systems to enable it to comply with the permit conditions. The decision was taken in accordance with RGN 5 on Operator Competence.</p> <p>See <b>key issues</b> section.</p>                                  |