

Operational Risk Appraisal (Opra) for Installations under EPR



MREC BJ5775IF H

Organisation Name
Neath Port Talbot Recycling Ltd

Case Number
BJ5775IF

Version
NRW V1

Opra Scheme
NRW V1

Full instructions for the use of this spreadsheet are contained in the accompanying documentation. It is recommended that the user fills in the spreadsheet following the order of worksheets listed below (click on the appropriate tab at the bottom of the screen). Not all worksheets require input, for those that do, the fields that may require input have no background colour. The sequence of worksheets is divided into two sections Sheets 1 to 11 are concerned with the input of data. Sheet 12 is the summary for the Opra Scores and Sheet 13 displays the charges.
If you cannot see the whole of this box or it is very small, please click 'View' and adjust 'Zoom' level.

1 Listed Activities

Please refer to the Opra Scheme for Installations for the look-up tables and guidance. Use abbreviated descriptions, select the Schedule 1 references and bands from the pick lists provided.

2 Other Activities

Please enter Part A(2), Part B and aggregated activities onto this sheet.

3 Complexities

Summary of complexities and rules applied

4 Emissions to Air

5 Emissions to Water

6 Emissions to Land

7 Emissions to Sewer

8 Emissions to Waste

For EA Use

9 Emissions Summary

No input is required. Output screen only. Summary of emissions.

10 Location

11 Operational Management

12 Opra Summary

No input is required. Output screen only. The emissions are shown separately.

13 Calculation

No input is required. Charges with separate emissions totals. It is possible to clear the scores and recalculate the charges to include any amendments.

Consolidated Permit

Listed Activities - Complexity Attribute

Organisation: Neath Port Talbot Recycling Ltd
Case Number: BJ5775IF

	Description of Activity	Schedule 1 Reference	Regulatory Complexity
1	Incineration of Non-hazardous Waste	5.1 Part A (1) b)	E
2	Incineration of Non-hazardous Waste	5.1 Part A (1) b)	E
3	Formation of Refuse Derived Fuel	5.4 Part A (1) a) (ii)	A
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			
16			
17			
18			
19			
20			
21			
22			
23			
24			
25			

Totals before any rules are applied	
A	1
B	0
C	0
D	0
E	2

If there is insufficient space please attach a paper record

If Rule 4 applies - please complete Other Activities sheet

Aggregation and Schedule1 Part A(2) and Part B Activities

Organisation Name:

Neath Port Talbot Recycling Ltd

Case Number:

BJ5775IF

If there is insufficient space
please attach a paper record

Schedule 1 Part A(1) - Rule 4 Aggregation Details

1	Aggregation Group	Description	Schedule 1 Ref	Complexity
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
24				
25				

Rule 4

Not Applied

List of Schedule 1 Part (A) 2 and Part B Activities included in the Installation

1	Enter description of Activity	Schedule 1 Reference
2		
3		
4		
5		
6		
7		
8		
9		
10		
11		
12		
13		
14		
15		
16		
17		
18		
19		
20		

EPR- Installations Charging Scheme Complexity - Application of Rules

Company Permit	Neath Port Talbot Recycling Ltd BJ5775IF
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	Description / Aggregation Group	Schedule 1 Ref	Complexity	Rule 3 Capping	Rule 5 not applied	Rule 6 not applied	Rule 7 Not Applied
1	Incineration of Non-hazardous Waste	5.1 Part A (1) b)	E	E	E	E	E
2	Incineration of Non-hazardous Waste	5.1 Part A (1) b)	E	E	E	E	E
3	Formation of Refuse Derived Fuel	5.4 Part A (1) a) (ii)	A	A	A	A	A
4							
5							
6							
7							
8							
9							
10							
11							
12							
13							
14							
15							
16							
17							
18							
19							
20							
21							
22							
23							
24							
25							
26							
27							
28							
29							
30							

Summary of Rules Applied	
Rule 3	No
Rule 4	No
Rule 5	No
Rule 6	No
Rule 7	No

These totals will be carried forward and used to calculate the Opra Risk Summary and Calculation of Charges

Scores after Rules applied (Used for calculation of Charges)		
Complexity	First 6 Complexities	Remaining complexities
A	1	0
B	0	0
C	0	0
D	0	0
E	2	0
Capped	0	0
	Total	Total
		1
		0
		0
		0
		2
		0

Scores before rules applied (Used for summary of Risk)	
	1
	0
	0
	0
	2

Emissions Attribute - Releases to Air

Organisation Name:	Neath Port Talbot Recycling Ltd
Case Number:	BJ5775IF

Please check that the data is entered in the correct units.
The Emission Index will only show if the data entered exceeds the threshold.

Please tick box if this sheet is applicable

Substance	Units	Emission Threshold	Maximum Quantity	Emission Index	Notes
Oxides of Sulphur	Tonnes Year	10	17	2	
Oxides of Nitrogen	Tonnes Year	10	62	6	
Dioxins and Furans	mg TEQ year	0.1	34	340	
Hydrogen Chloride	Kg year	1000	3500	4	
Ammonia	Kg year	100	3500	35	
Particulates	Kg year	100	5500	55	

Emissions Attribute - Releases to Water

Organisation Name:	Neath Port Talbot Recycling Ltd	Please check that the data is entered in the correct units. The Emission Index will only show if the data entered exceeds the threshold.
Case Number:	BJ5775IF	

Please tick box if this sheet is applicable

Substance	Units	Emission Threshold	Maximum Quantity	Emission Index	Notes

Emissions Attribute Releases to Land

Organisation Name: Port Talbot Recycling Ltd
Case Number: BJ5775IF

Please check that the data is entered in the correct units.
 The Emission Index will only show if the data entered exceeds the threshold.

Please tick box if this sheet is applicable

Substance/Landfill Type	Units	Emission Threshold	Maximum Quantity	Emission Index	Notes
Inert waste	Tonnes year	1000		0	
Non hazardous waste (non biodegradable)	Tonnes year	350		0	
Hazardous waste	Tonnes year	100		0	
Non hazardous waste (biodegradable)	Tonnes year	100		0	
Total				0	

Emissions Attribute - Off-site Disposals of Waste

Organisation Name: Port Talbot Recycling Ltd
 Case Number: BJ5775IF

Please check that the data is entered in the correct units.
 The Emission Index will only show if the data entered exceeds the threshold.

Substance	Units	Emission Threshold	Maximum Quantity	Emission Index	Notes
Inert waste	Tonnes year	1000		0	
Non hazardous waste (non biodegradable)	Tonnes year	350	1328.5		4 bottom ash
Hazardous waste	Tonnes year	100	471.8		5 fly ash
Non hazardous waste (biodegradable)	Tonnes year	100		0	
Total				9	
Weighting Factor					(Weighting factor = 0.33)
Weighted Total				3	

Emissions Attribute - Off-site Recovery, Recycling, Re-use of Waste

Company Permit: Port Talbot Recycling Ltd
 BJ5775IF

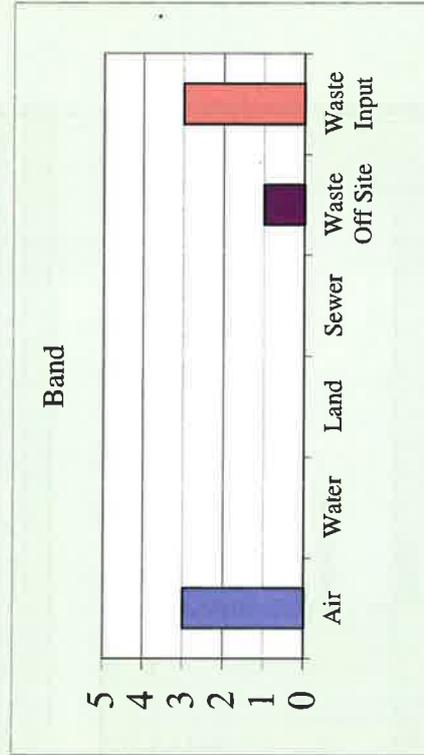
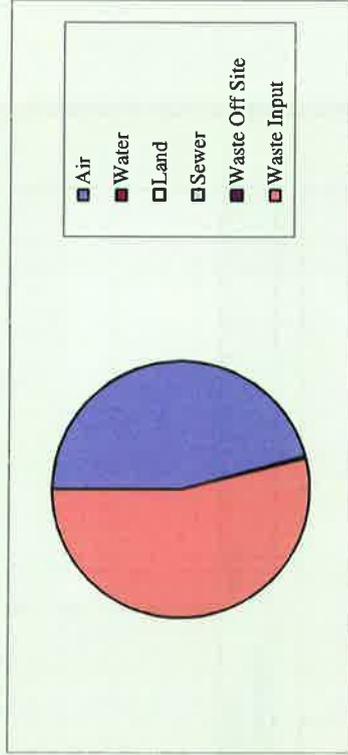
Please check that the data is entered in the correct units.
 The Emission Index will only show if the data entered exceeds the threshold.

Substance	Units	Emission Threshold	Maximum Quantity	Emission Index	Notes
Inert waste	Tonnes year	1000		0	
Non hazardous waste (non biodegradable)	Tonnes year	350		0	
Hazardous waste	Tonnes year	100		0	
Non hazardous waste (biodegradable)	Tonnes year	100		0	
Total				0	
Weighting Factor					(Weighting factor = 0.1)
Weighted Total				0	
Off-Site Total				3	

Emissions Attribute Summary Sheet

Organisation:	Math Port Talbot Recycling Ltd
Case Number:	BJ5775IF

Pathway	Overall Emission Index
Air	441
Water	0
Land	0
Sewer	0
Waste Off Site	3
Waste Input	520



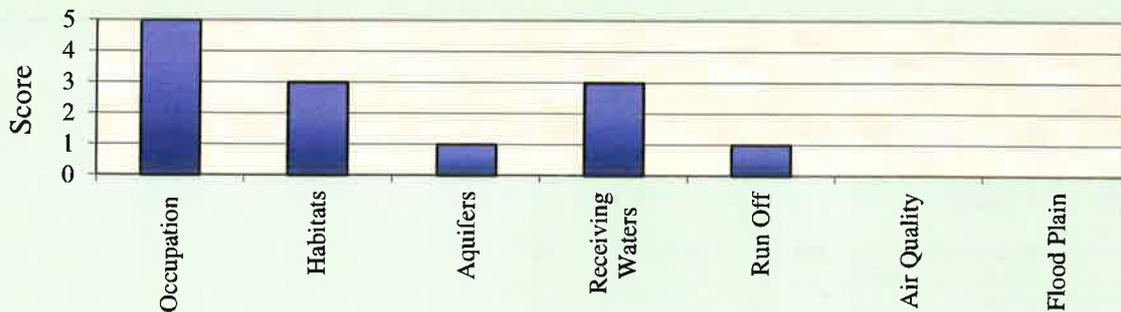
Pathway	Band
Air	3
Water	0
Land	0
Sewer	0
Waste Off Site	1
Waste Input	3

Location Attribute

Organisation Name:	Neath Port Talbot Recycling Ltd
Case Number:	BJ5775IF

Parameter	Yes/No	Available	Score
Human Occupation/Presence:			
a) if within 50m of the boundary	<input type="text" value="Yes"/>	5	5
or:			
b) if greater than 50m but less than 250m of boundary	<input type="text" value="No"/>	3	
or:			
c) if greater than 250m but less than 1km of boundary	<input type="text" value="No"/>	1	
Statutory sites designated under Habitats Directive or CROW Act 2000:			
a) if "relevant" under Habitats Directive	<input type="text" value="Yes"/>	3	3
or			
b) if CROW Act 2000 assessment required	<input type="text" value="No"/>	2	
a) if on an aquifer and within a Groundwater Protection Zone	<input type="text" value="No"/>	2	1
or			
b) if on an aquifer and not within a Groundwater Protection Zone	<input type="text" value="Yes"/>	1	
Sensitivity of receiving waters (information available from Agency's "What's in your backyard" webpages), if:			
a) grade 5	<input type="text" value="No"/>	1	3
b) river category grade 4 or 3	<input type="text" value="No"/>	2	
c) river category grade 2 or 1 or estuarine	<input type="text" value="Yes"/>	3	
a) If there is direct runoff from the site without interceptors or other active control measures	<input type="text" value="No"/>	2	1
or			
b) If as above but there are interceptors or active control measures	<input type="text" value="Yes"/>	1	
a) If within an Air Quality Management Zone (AQMZ) and emit pollutant that has been declared for that AQMZ	<input type="text" value="No"/>	3	0
or			
b) If within 2km of an Air Quality Management Zone (AQMZ) and emit pollutant that has been declared for that AQMZ	<input type="text" value="No"/>	2	
or			
c) as a) except do not emit pollutants that have be declared for the AQMZ	<input type="text" value="No"/>	1	
If within a flood plain		2	0
Maximum Score = 20	Total		13
Band A = 0 - 4, B = 5 - 8, C = 9 - 12, D = 13 - 17 and E = 18 - 20	Band		D

Location Attribute Profile



Operator Performance

		Yes/No	Points available	Points scored	Post or group responsible for each requirement	Document reference (*) or date by which systems will be in place (*see para 4.4.2)
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Operations and Maintenance section - 20%

Effective operational and prev maintenance systems shall be employed on all aspects of the process where any failure could impact on the environment.

1	Are there documented operating procedures for operations that may have an adverse impact on the environment?	Yes	2.0	2.0		
2	Is there a defined procedure for identifying, reviewing and prioritising items of plant for which a preventative maintenance regime is appropriate?	Yes	2.0	2.0		
3	Are there documented procedures for monitoring emissions or impacts?	Yes	2.0	2.0		
4	Is there a preventative maintenance programme for those items of plant whose failure could lead to impact on the environment?	Yes	1.0	1.0		
5	Does the preventative maintenance programme include regular checks and formal inspections of 'static' items such as tanks, pipework, retaining walls, bunds and ducts?	Yes	1.0	1.0		
6	Do the operations and maintenance systems include auditing environmental performance?	Yes	2.0	2.0		
7	Are the reports, results and recommendations arising from audits made available to senior management on a regular basis?	Yes	2.0	2.0		
8	In the last two years, has there been any notifiable incident or release for which lack of maintenance was a contributory cause ?	No	-2.0	0.0		
9	In the last two years, has there been any notifiable incident or release for which the root cause could not be identified?	No	-3.0	0.0		
Operations and Maintenance Total			12.0	12.0	100.0%	2.0

Competence and Training - 20%

The Operator shall ensure that all relevant management and operational staff (including contractors and those responsible for purchasing equipment and materials) receive adequate training with regard to their responsibilities under the Permit.

Particular attention should be given to the following:

- Minimisation of all potential environmental effects from operation under normal, abnormal, start up and shut down circumstances;**
- Prevention of accidental emissions and action to be taken when accidental emissions occur; and**
- The need to report deviation from the permit.**

1	Has a training needs assessment been carried out which: <input type="checkbox"/> Identifies all posts for which specific environmental awareness training is required; and <input type="checkbox"/> Identifies the scope and level to which such training is to be given?	Yes	3.0	3.0		
2	Are training systems in place for all relevant staff that cover the following factors:					
	<input type="checkbox"/> the regulatory requirements associated with the Permit as they affect their work activities and responsibilities;	Yes	2.0	2.0		
	<input type="checkbox"/> likely potential environmental impacts which may be caused by plant under their control. This should cover both normal and abnormal circumstances;	Yes	2.0	2.0		
	<input type="checkbox"/> reporting procedures to inform supervisors or managers of deviations from permit conditions;	Yes	1.0	1.0		
	<input type="checkbox"/> procedures to be used by supervisors or managers and for the reporting of deviations from permit conditions to the Agency; and	Yes	2.0	2.0		10/04/2019

Operator Performance

	Yes/No	Points available	Points scored	Post or group responsible for each requirement	Document reference (*) or date by which systems will be in place (*see para 4.4.2)
<input type="checkbox"/> prevention of accidental emissions and action to be taken when accidental emissions occur?	Yes	2.0	2.0		
3 Are the skills and competencies necessary for key posts documented and are records of training needs and training received maintained?	Yes	1.0	1.0		
4 Do the key posts include contractors, those responsible for liaising with contractors and those purchasing equipment and materials?	Yes	1.0	1.0		
5 Do you assess the potential environmental risks posed by the work of contractors and provide instructions to contractors about protecting the environment while working on site?	Yes	1.0	1.0		
6 In the last 2 years, have there been any notifiable incidents or releases, which it has been identified that lack of training was a contributory cause ?	No	-2.0	0.0		
7 Are there industry standards for training in this sector (e.g. WAMITAB) and if so do you apply them? (If no industry standards please leave blank)	Yes	-2.0	0.0		
8 Are individual and organisational training needs reviewed on a regular (e.g. annual) basis?	Yes	2.0	2.0		
Competence Training Total		17.0	17.0		

Emergency planning - 20%

<p>The Operator shall maintain an accident management plan which identifies potential events or failures which might lead to an environmental impact. The plan shall identify:</p> <ul style="list-style-type: none"> <input type="checkbox"/> the likelihood of, and the actions to be taken to minimise, these potential occurrences; <input type="checkbox"/> the environmental consequences and an action plan to deal with such occurrences; <input type="checkbox"/> The Operator shall have a written procedure for handling, investigating, communicating and reporting of incidents and actual or potential non-compliance with permit conditions including taking action to mitigate any impacts caused and for initiating and completing corrective action. <input type="checkbox"/> In the case of abnormal emissions the operator shall; <ul style="list-style-type: none"> <input type="checkbox"/> investigate and undertake remedial action immediately; <input type="checkbox"/> promptly record the events and actions taken; and <input type="checkbox"/> ensure the Regulator is made aware, as soon as practicable. 					
1 Is there an accident plan that complies with guidance covering the following aspects of foreseeable scenarios: likelihood, consequences, actions to prevent, action to take in the event it occurs?	Yes	4.0	4.0		
2 Has the plan identified areas where improvement is needed?	Yes	1.0	1.0		
3 Where improvement has been identified, does the plan include an implementation programme with acceptable timescales to the Agency? If not, 2 points will be deducted.	Yes	-2.0	0.0		
4 Are there written procedures for handling, investigating, communicating and reporting actual or potential non compliance with operating procedures or emission limits?	Yes	1.0	1.0		
5 Are there written procedures for handling, investigating, communicating and reporting environmental complaints?	Yes	1.0	1.0		
6 Are there written procedures for investigating incidents, (and near-misses) including identifying suitable corrective action and following up implementation of that action?	Yes	2.0	2.0		
7 In the last 2 years, have there been any notifiable incidents or releases for which it has been identified that lack of emergency planning was a contributory cause ?	No	-2.0	0.0		10/04/2019

Operator Performance

	Yes/No	Points available	Points scored	Post or group responsible for each requirement	Document reference (*) or date by which systems will be in place (*see para 4.4.2)
8: Are there audit records of investigations into non compliance, complaints and incidents? Does the audit cover follow up actions? Do the audit reports go to senior managers?	Yes	3.0	3.0		
Emergency planning Total		12.0	12.0		

Organisation - 40%

The following aspects of site management procedures and controls may not be in the permit conditions but are likely to have an impact on the Agency resources required to apply the Env Permitting Regulations.

1	Do you operate an externally audited environment management system, if so answer one of the following questions. N.B Please enter your Certificate Number, Name of certification body and their UKAS Registration Number in the space for document reference.				
1.1	Is your Environmental Management System EMAS registered? If yes select Y and go to question 4.	No	20	0	
1.2	Is your Environmental Management System certified to ISO 14001? If yes enter Y and go to questions 3 and 4.	Yes	15	15	
1.3	Is your system an Environmental Mangement System subject to external audit through a third party audit programme with a published methodology (excludes in-house company audit programme). If yes enter and go to questions 3 and 4.	No	12	0	
Sub Total			Max 20	15.00	
2	If you do not operate an externally audited environmental management system then assess your system against the criteria below:				
2.1	Has your company adopted an environmental policy and programme which :				
	<input type="checkbox"/> includes a commitment to continual improvement and prevention of pollution?		1.0	0.0	
	<input type="checkbox"/> includes a commitment to comply with relevant legislation, and with other requirements that the organisation subscribes to?		1.0	0.0	
	<input type="checkbox"/> identifies, sets, monitors and reviews environmental objectives, independently of the permit?		1.0	0.0	
2.2	Are there procedures that incorporate environmental issues into the following areas (as supported by demonstrable evidence e.g. written procedures):				
	<input type="checkbox"/> the control of process change on the installation;		1.0	0.0	
	<input type="checkbox"/> design and review of new facilities (including provision for their decommissioning), engineering and other capital projects;		1.0	0.0	
	<input type="checkbox"/> capital approval;		1.0	0.0	
	<input type="checkbox"/> purchasing policy;		1.0	0.0	
2.3	Are there audits, at least annually, to check that all activities are being carried out in conformity with the above requirements?		1.0	0.0	
2.4	Are they independent? (name the auditing body)		2.0	0.0	
2.5	Are there reports annually on environmental performance, objectives and targets, future planned improvements and or facilitate (participate in) local community liaison meetings?		1.0	0.0	
3	Does your company produce a public environmental statement? You may score in this box for ISO 14001 and industry systems but not for EMAS as this is a requiremen for EMAS.	No	1.0	0.0	

Operator Performance

	Yes/No	Points available	Points scored	Post or group responsible for each requirement	Document reference (*) or date by which systems will be in place (*see para 4.4.2)
4 Within the past 5 years have you failed to meet an improvement condition either set by the Agency in a Permit or Variation by the due date, without prior agreement? (minus 2 for each failure). ADD NUMBER OF FAILURES NOT Y OR N	0	-2.0	0.0		
Organisational Totals		20.0	15.00		

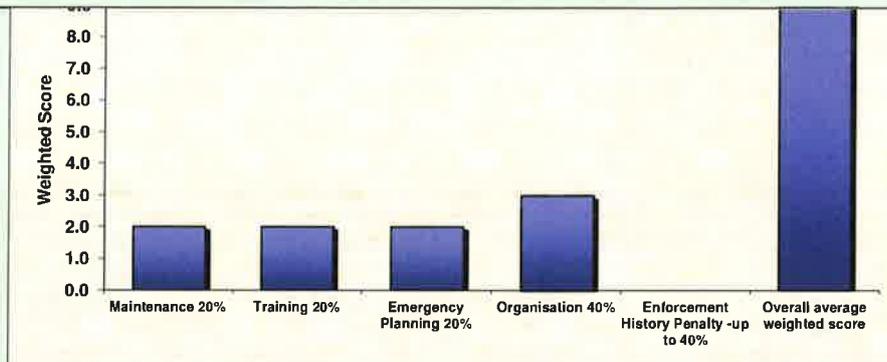
Enforcement History (0 to -40% weighting)

				Notice etc	Date Issued	Date Spent
1 Enforcement , Improvement, Works, Compliance or Restoration Notices issued in the past year by the Environment Agency under any legislation, by the Health and Safety Executive relevant to the COMAH Regulations or by local authorities under Part I of the Environmental Protection Act 1990 or relevant notice or Abatement Notices issued by local authorities or magistrates courts under Part III of the Environmental Protection Act 1990	0	None 0				
		1st - 5				
		2nd -10				
		3rd or more -40				
2 Formal cautions, Enforcement Undertakings or Fixed Monetary Penalties issued by the Environment Agency in respect of offences under any legislation in the last 3 years.	0	None 0				
		1st - 5				
		2nd -10				
		3rd or more -40				
3 Prohibition, Stop, Suspension or Revocation Notices issued by the Environment Agency under any legislation, by the Health and Safety Executive relevant to the COMAH Regulations or by local authorities under Part I of the Environmental Protection Act 1990 in the last 3 years	0	None 0				
		1st - 10				
		2nd or more -40				
4 Convictions on prosecutions brought by the Environment Agency under any legislation, by the Health and Safety Executive relevant to the COMAH regulations or by local authorities (in respect of offences under Parts I or III of the Environmental Protection Act 1990) in last 5 years (10 years where imprisonment was imposed). Or any Variable Monetary Penalty. [NB each individual offence counts separately].	0	None 0				
		1st - 15				
		2nd or more -40				

Enforcement History Total				
	Entered	Spent	Extant	Score
1 Enforcement etc Notices	0	0	0	0
2 Formal Cautions etc	0	0	0	
3 Prohibition etc Notices	0	0	0	
4 Convictions on Prosecutions etc	0	0	0	
Enforcement History Total (min -40)				0

Operator Performance

		Yes/No	Points available	Points scored	Post or group responsible for each requirement	Document reference (*) or date by which systems will be in place (*see para 4.4.2)
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Band E= less than 2
D= 2 to 3.99, C= 4 to 5.99, B= 6 to 7.99, A= 8 to 11

BAND=

A

Company : Neath Port Talbot Recycling Ltd

Permit: BJ5775IF

Data calculations generating the above graph

Summary	Max	Score from above	Normalised to scale out of 10	Weighting	Weighted score
Maintenance 20%	12.00	12.00	10.00	20.00	2.0
Training 20%	17.00	17.00	10.00	20.00	2.0
Emergency Planning 20%	12.00	12.00	10.00	20.00	2.0
Organisation 40%	20.00	15.00	7.50	40.00	3.0
Enforcement History Penalty -up to 40%	-40.00	0.00	0.00	40.00	0.0
Overall average weighted score					9.0

Opra Banded Profile

Organisation Name:	Neath Port Talbot Recycling Ltd
Case Number:	BJ5775IF

Attribute	Profile before any rules or capping applied		Opra Banded Profile used for charging	
	Number	Band	Number	Band
Complexity	1	A	1	A
	0	B	0	B
	0	C	0	C
	0	D	0	D
	2	E	2	E
Emissions	Air	C		C
	Water	-		-
	Land	-		-
	Sewer	-		-
	Waste Off Site	A		A
Location	Waste Input	C		C
Operator Performance		D		D
		A		A



EPR Installations Application Charge Calculation

(excludes Compliance Rating)
Scoring Summary - Financial

Attribute	Band	Score	Total Score
Complexity	A	1	2
	B	0	0
	C	0	15
	D	0	45
	E	2	82
			110
Emissions to Air	C		220
Emissions to Water	-		20
Emissions to Land	-		0
Emissions to Sewer	-		0
Emissions to Off-site Waste	A		0
Emissions - Waste Input	C		1
Location	D		20
Operator Performance	A		40
Total Opra charging score			313.00

Indicative Fees & Charges

Application Fee	£ 64,478.00
Subsistence Charge*	£ 31,300.00
Substantial Variation	£ 35,369.00
Standard Variation	£ 17,841.00
Partial Surrender	£ 30,674.00
Full Surrender	£ 39,751.00
Closure	£ -

Part A(2) and Part B Activities

Please ensure that you have completed these entries in the Listed Activities sheet. The charge shown will not include any charges associated with Local Authority Part A (2) or Part B activities that form part of the installation.
Refer to Installations Charging Scheme for further details.

Opra Charge Multipliers	
Application	206
Subsistence	100
Substantial Variation	113
Standard Variation	57
Partial Surrender	98
Full Surrender	127
Closure (Landfill only)	

* Does not take into account Compliance Rating

Compliance Rating

Breach Category*	Events	Score per event	Total
1	0	60	0
2	0	31	0
3	0	4	0
4	0	0.1	0
Compliance Index			0

Compliance Rating Band A

Compliance Rating Multiplier 95%

* Under Compliance Classification Scheme (CCS)

Opra Score

Without Compliance Rating 313
Including Compliance Rating 297.35

Subsistence Fee: £ 29,735.00

