MBG
Mekatek Business Group

Mekatek Limited

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27th September 2019

Regulated Industry Permitting Team
Natural Resources Wales
Ty Cambria
29 Newport Road
Cardiff
CF24 0TP

RE: Statutory Notice, permit reference EPR/YP3937SH

In response to a statutory notice dated 5th April 2019 please find our response on the following pages.

For the purpose of ease of reference this response has been generated in the numbered points as specified in Schedule 1 of the received notice.

If you have any queries regarding the supplied information please do not hesitate to contact me.

Your sincerely

Daniel Lewis
Mekatek Limited

1. **Confirm whether or not you currently comply with the requirements of the BAT Conclusions, including any associated emission levels, providing a description of the techniques in place and how they meet the standard.**

BAT1

It is the opinion of the operator that the site is compliant with BAT 1. Examples of the standards which are used to ensure compliance is achieved are included below:

The organisation holds monthly Health, Safety and Environmental Meetings. Attendees of these meetings include directors, members of the senior management team, members of the junior management team and employee representatives. These meetings provide an open forum for persons at all levels in the organisation to have input into environmental and health and safety matters whilst demonstrating the commitment of the senior management and directors of the organisation. This is also acts as the ideal opportunity to enhance and promote upward and downward communication within the organisation.

An 'open door' policy is also adopted by the organisation in that staff of all levels are welcome to discuss matters with supervisors, managers or directors, promoting a true employee involvement culture.

Formal organisational structure, Environmental Policy, training, recruitment and selection polices ensure that the structure and responsibilities are transparent, and recruitment, training, awareness and competences are clear. Key staff members are actively encouraged and sponsored to further develop themselves, examples include WAMITAB and IOSH qualifications. Whilst it is accepted that there is a direct and tangible benefit to the organisation there is also a significant indirect benefit in terms of added value to the organisation.

The site operates to a MCERTS management system to ensure that the discharge of treated effluent leaving the site is controlled. Various other in-house process controls are in place to ensure that operational and monitoring activities are carried out in a procedural manner.

Other relevant programmes, policies and procedures applicable to BAT 1 include the Environmental Management System and associated programmes, policies and procedures which are reviewed as necessary by management and directors, these include but are not limited to:

- Fire prevention and mitigation plan
- Pre-planned maintenance schedules
- Emergency procedure
- Complaints procedure
- Monthly sample preparation
- Pre assessment procedures
- Acceptance procedures
- Data management procedures

The operator strives to be 'best in class' in terms of technology used at the operating sites and where suitable using or even developing cleaner technologies to improve and enhance the treatment processes.

Other topics which are mentioned in BAT 1 of the BAT Conclusions Document are referred to again later on in this document so these will be dealt with separately – for example Odour Management Plan (BAT 12).

BAT 2

It is the opinion of the operator that the site is compliant with BAT 2. Example of the standards which are used to ensure this are included below:

Mekatek Limited operate a comprehensive pre-acceptance procedure which is both hard copy and electronic. All information relating to pre-acceptance of a waste stream is stored on the Microsoft NAV System and all key staff have access to this system.

Mekatek Limited operate a detailed waste acceptance procedure, this is a comprehensive procedure which captures plant capacity, job booking restrictions, sampling and testing strategy, waste transfer note and tracking information.

The site operates an MCERTs management system and is externally audited to ensure compliance. Quality output of materials consigned off site for further treatment or disposal is dependent on the material and the requirements of the downstream processing site.

Waste segregation starts at the pre-acceptance stages and follows through to waste booking and acceptance. Following acceptance and verification material is moved into a dedicated storage area.

There is currently no mechanical sorting of incoming solids waste as discussed in the BAT Conclusion document and only waste of a similar nature is bulked or blended on the site.

BAT 3

It is the opinion of the operator that the site is compliant with BAT 3. Wastewater flows and concentrations are detailed in a standard operating procedure which trends the average concentration values on the effluent treatment processes from data generated on the site.

BAT 4

It is the opinion of the operator that the EMS, site layout plans and acceptance procedure demonstrate that the site is compliant with BAT 4.

BAT 5

It is the opinion of the operator that the site is compliance with BAT 5. This can be demonstrated as by the following:

- Pre-acceptance and acceptance procedures
- Staff training, both internal and external to ensure competent
- Sampling and process monitoring
- Risk assessment and safe working procedures for specific tasks

BAT 6

The response to BAT 2 and BAT 3 (above) demonstrate that the site is compliant with BAT 6.

BAT 7

The site operator is currently undergoing extensive modelling work on the discharge of treated final effluent from the site.

There has been considerable discussion with NRW to date on this subject. Table 1 below provides a quick illustration of the progress made so far regarding this.

31st May 2018	Detailed modelling report generated on behalf of the operator was submitted to NRW.
21st June 2019	Draft response received from NRW.
Ongoing	Discussions with NRW ongoing.

Table 1

BAT 8

Not applicable

BAT 9

Not applicable

BAT 10

It is the opinion of the operator that the site is compliance with BAT 10 as the site operates an Odour Management Plan which has been generated in accordance with the relevant guidance:

- Natural Resources Wales Technical Horizontal Guidance Note 'H4: Odour Management: How to comply with your permit', Version 2.0.

BAT 11

It is the opinion of the operator that the site is compliant with BAT 11.

- Process water is measured on a daily basis as abstracted water from 2x licensed bore holes. The usage of this is monitored continuously and reported to NRW on an annual basis.
- Raw materials in terms of treatment additives are monitored continuously, there is no set budget for these materials as each individual order must be sanctioned by a director to ensure that the materials are not being overused.
- Energy is continuously monitored by the energy provider and HH (half hourly) reports are available for usage, trending and budgetary purposes.

BAT 12

It is the opinion of the operator that the site is compliant with BAT 12. Please see response to BAT 10.

BAT 13

It is the opinion of the operator that the steps a, b or c of BAT 13 are not applicable as there is no history of odour emissions from the site and an Odour Management Plan is operational on the site.

BAT 14

As BAT 13

BAT 15

Not applicable

BAT 16

Not applicable

BAT 17

It is the opinion of the site operator that the site is compliant with BAT 17.

There is a noise and vibration policy statement in operation on the site detailing that there is no significant noise and/or vibration generated on the site likely to cause significant noise beyond the site boundary. This line of approached is supported by 'How to Comply' and further supported by the BAT Conclusions Document under *'Applicability'*.

BAT 18

See BAT 17

BAT 19

It is the opinion of the operator that the site is compliant with BAT 19.

Abstracted water is used in process applications and cleaning before being treated on site via the effluent treatment operations.

Water re-use and re-circulation is optimised on site but not to a degree where it will impact on the treatment operations.

The processing area benefit from impermeable surfaces. All water from the impermeable areas is processed via the effluent treatment operations before being discharged as treated final effluent.

The treatment processes are subject to a monitoring programme.

Discharge of incoming material only takes place during operational hours which mitigates the risk of overflow of tanks and vessels. Level control and telemetry equipment is installed on tanks and vessels which have been identified, on risk basis as requiring the use of this type of technology.

Surface water from the site which is treated by the effluent treatment process acts as additional dilution water during periods of heavy rain to further reduce the risk of shock loading on the effluent treatment processes. During periods of heavy rain the rain water will take precedence over the pumping of abstracted water on the site.

Regular site inspections are carried out on the site to assess the condition of above ground pipework and storage infrastructure.

The site operates a service whereby all incoming waste material is imported onto site by means of road vehicles. It is at the discretion of the site to retain the option to 'turn away' incoming loads should the demand be overwhelming.

BAT 20

A number of the treatment processes detailed in BAT 20 are utilised on the site, therefore it is the opinion of the operator that the site is compliant with BAT 20. The treatment processes utilised on site include:

- Physical separation
- Activated sludge processes
- Nitrification / denitrification
- Coagulation and flocculation
- Sedimentation

A number of other techniques are currently being considered to enhance the treatment capability of the site.

BAT 21

It is the opinion of the site operator that the site is compliant with BAT 21.

Examples of measures in place to demonstrate compliance include:

- Fire prevention and mitigation plan
- Emergency plan
- Accident and incident reporting systems
- Communication – e.g monthly Health, Safety and Environmental meetings.

BAT 22

Where possible raw materials will be substituted with waste products providing there is no identified detrimental effect on the treatment processes.

BAT 23

Energy efficiency in the terms as detailed in the BAT Conclusion Document is not suited to the operation of the site. The ability to express energy consumption in terms of kWh/tonne of waste processed would provide no accurate data for plant operations as a whole. The design of the effluent plant especially requires specific processes to be run regardless of volume of incoming material. A hypothetical example being if the incoming waste imports needed to be stopped for an extended period of perhaps 10 days due to reasons outside of the operators control the reduction of units of electrical power consumed on the effluent plant would be negligible. This is due to the fact that a situation of returning treated effluent to the main balance tanks will need to be instigated to maintain hydraulic loading on the treatment systems in addition to increased recirculation, additional abstracted water would be required to keep the plant operating if dry weather is being experienced until such time when regular imports of waste re-commenced.

BAT 24

It is the opinion of the operator that the site is compliant with BAT 24.

Packaging is re-used where ever possible either for the use of site operations or for being returned to producers of waste for direct re-use for the packaging of the same categories of waste materials.

BAT 25

Not applicable

BAT 26

Not applicable

BAT 27

Not applicable

BAT 28

Not applicable

BAT 29

Not applicable

BAT 30

Not applicable

BAT 31

Not applicable

BAT 32

Not applicable

BAT 33

See BAT 2

BAT 34

Not applicable

BAT 35

It is the opinion of the operator that the site is compliant with BAT 35. Please see BAT 19, above.

BAT 36

Not applicable

BAT 37

Not application

BAT 38

Not applicable

BAT 39

Not applicable

BAT 40

Not applicable

BAT 41

Not applicable

BAT 42

Not applicable

BAT 43

Not applicable

BAT 44

Not applicable

BAT 45

Not applicable

BAT 46

Not applicable

BAT 47

Not applicable

BAT 48

Not applicable

BAT 49

Not applicable

BAT 50

Not applicable

BAT 51

Not applicable

BAT 52

Not applicable

BAT 53

Not applicable

2. If you do not comply with the BAT conclusion, describe how and when you intend to meet the standard, before the 17th August 2022, being the date which, hereafter in this Notice, is referred to as the 'compliance date'.

The information provided under this heading is not intended to suggest or otherwise be interpreted that the operator is not compliant with certain areas of the BAT Conclusion Document. There is an ongoing matter regarding the discharge of the treated final effluent from the site and as stated previously there is extensive work being carried out regarding this.

A detailed report was submitted by the operator to NRW on the 31st May 2018 providing the findings of the modelling work along with suggested consent limits. The report was the result of work carried out by a consultant on behalf of the operator. A draft response was received from NRW on the 21st June 2019 requesting some further work be done on the modelling which is being progressed.

There is some ambiguity regarding which emission limits would take precedence – the BREF limits or the limits discussed in the draft response from NRW. There is some variance in limits in both of these pieces of documentation. Based on table 2 below as an example, the BREF limits for metals in the discharge are fully achievable by the site, these are in fact significantly higher that the limits suggested in the report submitted to NRW.

Dialogue with NRW is ongoing regarding the detailed modelling work on the treated final effluent from the site.

	BREF TABLE 6.1			IC 20 Suggested Consent Limited
Substance	mg/l	ug/l		ug/l
Cadmium	0.05	50		2
Chromium	0.15	150		100
Copper	0.5	500		175
Lead	0.1	100		30
Nickel	0.5	500		175
Mercury	5	5		2.5
Zinc	1	1000		400

Table 2

3. **Confirm if you intend to continue operating in a manner which would not comply with the relevant new BAT Conclusion, after the compliance date, what your justification for being allowed to do so is, and by what date you intend to come into full compliance, or a description of alternative measures adopted that will provide equivalent environmental protection.**

Please refer to the response for 2, above.

4. **Where the BAT conclusion has a BAT Associated Emission Level (BAT-AEL) specified, with which you will not comply by the compliance date you should consider requesting a derogation. To do this you must provide sufficient technical and commercial information to demonstrate that achieving that BAT-AEL would lead to costs that are disproportionately high, compared with environmental benefits due to one of more of:**
   - **i) The geographical location of your installation;**
   - **ii) The local environmental conditions around your installation;**
   - **iii) The technical characteristics of your installation**

No other justification for a derogation can be considered

In response to the above the operator would confirm that following the continuation of the modelling work being carried out on the discharge of treated final effluent from the site then a derogation would only be requested if required subject to the above caveats.

As illustrated from the table 2 above the suggested consent limits for metals far exceeds the BAT-AEL's in the BAT Conclusions document. Other limits as relevant are included in the on-going monitoring works for due consideration.

5. **Please provide a current OPRA profile, upon which your variation fee, if applicable will be based. The OPRA spreadsheet is available on our website at the following link:**

Please see appendix 01 for a current OPRA profile base on OPRA Scheme for Installations – April 2017.

6. **Where your activity involves the use, production or release of relevant hazardous substances (as defined in Article 3(18) of the Industrial Emissions Directive) carry out a risk assessment considering the possibility of soil and groundwater contamination at the installation with these substances. Where any risk of such contamination is established either:**
    - **Prepare and submit a baseline repot containing information necessary to determine the current state of soil and groundwater contamination:**

      or

    - **Provide a summary report referring to information previously submitted where you are satisfied that such information represents the current state of the soil and groundwater contamination;**

      So as to enable a quantified comparison to be made with the state of soil and groundwater contamination upon cessation of activity.

      Where you have concluded that there are no risks of soil or groundwater contamination, provide a copy of the risk assessment.

Please see appendix 02 for a copy of the risk assessment carried out.

7. **For all discharges to surface waters and/or sewer from the site, you must provide information for priority hazardous substances and any other relevant substances. The emissions monitoring for these substances should be carried out using the methods and standards described in the M18 guidance on "Monitoring of discharges to water and sewer".**

As detailed in 2, 3 and 4 above the operator has contracted the assistance of a consultant for professional modelling work to be carried out. This work has previously been completed and submitted to NRW.

Dialogue with NRW is ongoing regarding the detailed modelling work on the treated final effluent from the site.

END

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Appendix 1

Current OPRA Profile

Operational Risk Appraisal (Opra) for Installations under EPR

Cyfoeth Naturiol Cymru Natural Resources Wales

Organisation Name	Mekatek Limited

Case Number	

Version	NRW v2 01 April 2019

Opra Scheme NRW v2 01 April 2019

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

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.

For EA Use

☐ Consolidated Permit

Listed Activities - Complexity Attribute

Organisation:	Mekatek Limited
Case Number:	0

	Description of Activity	Schedule 1 Reference	Regulatory Complexity
1	Biological Treatment	5.3 Part A (1) a) (i)	B
2	Physico-chemical treatment	5.3 Part A (1) a) (ii) (C)	A
3	Blending or mixing	5.3 Part A (1) a) (iii)	B
4	Repackaging	5.3 Part A (1) a) (iv)	B
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	3
C	0
D	0
E	0

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:	Mekatek Limited
Case Number:	0

If there is insufficient space please attach a paper record

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

	Aggregation Group	Description	Schedule 1 Ref	Complexity
1				
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

	Enter description of Activity	Schedule 1 Reference
1		
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	Mekatek Limited
Permit	0

	Description / Aggregation Group	Schedule 1 Ref	Complexity	Rule 3 Capping	Rule 5 not applied	Rule 6 not applied	Rule 7 Not Applied
1	Biological Treatment	5.3 Part A (1) a) (i)	B	B	B	B	B
2	Blending or mixing	5.3 Part A (1) a) (iii)	B	B	B	B	B
3	Repackaging	5.3 Part A (1) a) (iv)	B	B	B	B	B
4	Physico-chemical treatment	5.3 Part A (1) a) (ii) (C)	A	A	A	A	A
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	Total
A	1	0	1
B	3	0	3
C	0	0	0
D	0	0	0
E	0	0	0
Capped	0	0	0

Scores before rules applied (Used for summary of Risk)
1
3
0
0
0

Emissions Attribute - Releases to Air

Organisation Name:	Mekatek Limited
Case Number:	0

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

Emissions Attribute - Releases to Water

Orgnisation Name:	Meketek Limited	Please check that the data is entered in the correct units.
Case Number:	0	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
Zinc	Kg year	20	33.1182	2	

Emissions Attribute Releases to Land

Organisation Name:	Mekatek Limited
Case Number:	0

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 to Sewer

Orgasination Name:	Mekatek Limited	Please check that the data is entered in the correct units.
Case number:	0	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

Emissions Attribute - Off-site Disposals of Waste

Organisation Name:	Mekatek Limited
Case Number:	0

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 = 0.33)
		Weighted Total		0	

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

Company	Mekatek Limited
Permit	0

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		0	

The table below should only be completed for S5.3 or 5.4 activities. For these activities the Off-Site Waste tables above should be left blank

Emissions Attribute - Waste Input

Company	Mekatek Limited
Permit	0

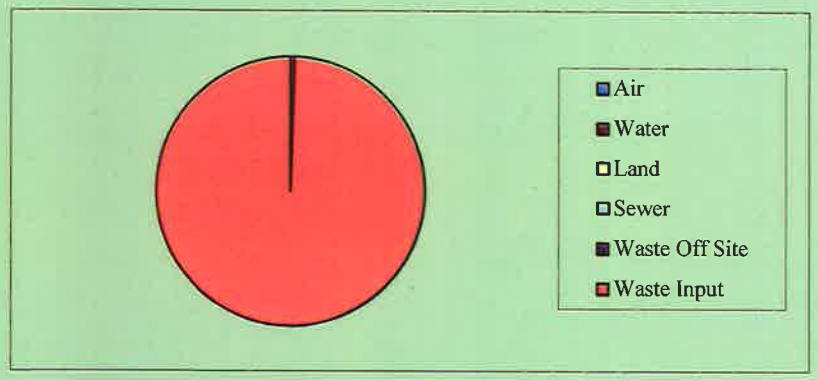
Please check that the data is entered in the correct units.
The Emission Index will only show if the data entered exceeds the threshold.

Substance	Units	Emission Threshold	Maximum Quantity	Emission Index	Notes
Inert waste	Tonnes year	1000		0	
Non hazardous waste (non biodegradable)	Tonnes year	750	10000	13	non hazardous sludges, non hazardous contaminated packaging and packaged goods for re packaging
Hazardous waste	Tonnes year	250	50000	200	Includes oil wastes for recovery, high strength hazardous liquid effluents for blending prior ro biological treatment, and wastes accepted for transfer.
Non hazardous waste (biodegradable)	Tonnes year	500	100000	200	Wastes accepted for biological treatment.
		Waste Input Total		413	

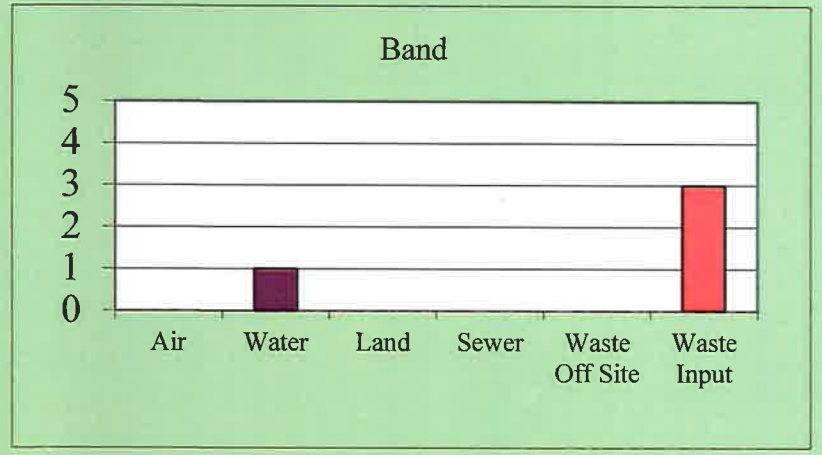
Emissions Attribute Summary Sheet

Organisation:	Mekatek Limited
Case Number:	0

Pathway	Overall Emission Index
Air	0
Water	2
Land	0
Sewer	0
Waste Off Site	0
Waste Input	413



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



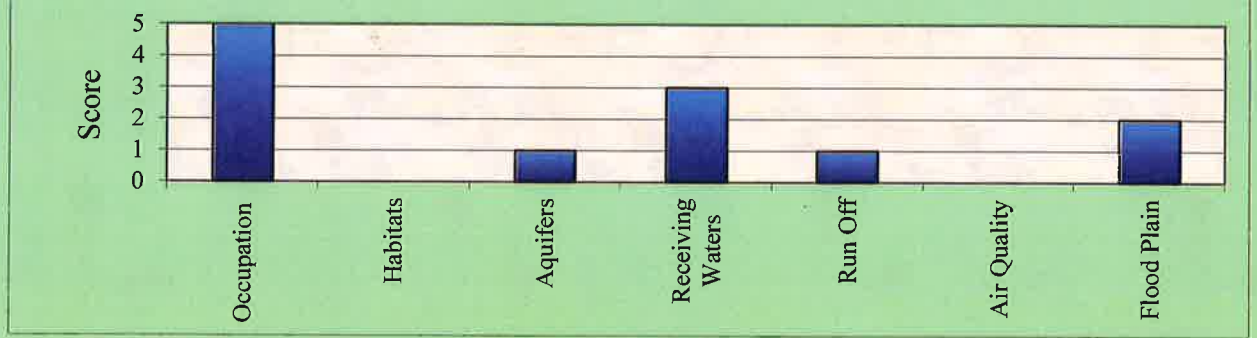
27/09/2019

Location Attribute

Organisation Name:	Mekatek Limited
Case Number:	0

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

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)
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: - Identifies all posts for which specific environmental awareness training is required; and - 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:					
	- the regulatory requirements associated with the Permit as they affect their work activities and responsibilities;	Yes	2.0	2.0		
	- 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		
	- reporting procedures to inform supervisors or managers of deviations from permit conditions;	Yes	1.0	1.0		
	- 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		
	- prevention of accidental emissions and action to be taken when accidental emissions occur?	Yes	2.0	2.0		

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)
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		
	Competance Training Total		**17.0**	**17.0**		

Emergency planning - 20%

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:

- **the likelihood of, and the actions to be taken to minimise, these potential occurrences;**
- **the environmental consequences and an action plan to deal with such occurrences;**
- **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.**
- **In the case of abnormal emissions the operator shall;**
  - **investigate and undertake remedial action immediately;**
  - **promptly record the events and actions taken; and**
  - **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?	No	1.0	0.0		
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.		-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		
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**	**11.0**		

Operator Performance

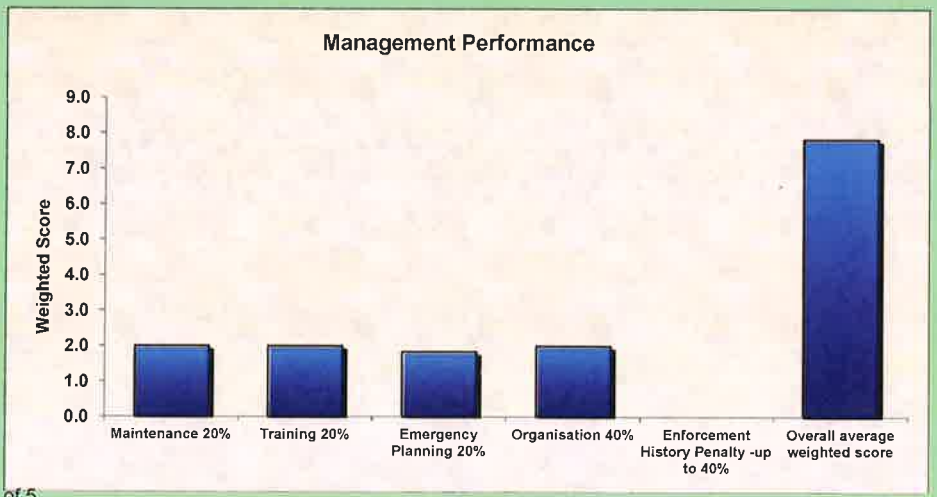
		Yes/No	Points available	Points scored	Post or group responsible for each requirement	Document reference (*) or date by which systems will be in place (*see para 4.4.2)
Organisation - 40%						
	The following aspects of site management procedures and controls may not be in the permit conditions but are 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.	No	15	0		
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**	**0.00**		
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 :					
	☐ includes a commitment to continual improvement and prevention of pollution?	Yes	1.0	1.0		
	☐ includes a commitment to comply with relevant legislation, and with other requirements that the organisation subscribes to?	Yes	1.0	1.0		
	☐ identifies, sets, monitors and reviews environmental objectives, independently of the permit?	Yes	1.0	1.0		
2.2	Are there procedures that incorporate environmental issues into the following areas (as supported by demonstrable evidence e.g. written procedures):					
	☐ the control of process change on the installation;	Yes	1.0	1.0		
	☐ design and review of new facilities (including provision for their decommisioning), engineering and other capital	Yes	1.0	1.0		
	☐ capital approval;	Yes	1.0	1.0		
	☐ purchasing policy;	Yes	1.0	1.0		
2.3	Are there audits, at least annually, to check that all activities are being carried out in conformity with the above requirements?	Yes	1.0	1.0		
2.4	Are they independent? (name the auditing body)	Yes	2.0	2.0	MCERTS audit is independent, all other audits are currently internal	
2.5	Are there reports annually on environmental performance, objectives and targets, future planned improvements and or facilitate (participate in) local community liaison meetings?	No	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		
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**	**10.00**		

Enforcement History (0 to -40% weighting)					
			Notice etc	**Date Issued**	**Date Spent**
1	**Enforcement , Improvement, Works, Compliance or Restoration Notices**	**0**	None 0 1st - 5		27/09/2019

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)
	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		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	
2	Formal Cautions etc	0	0	0	
3	Prohibition etc Notices	0	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)

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=	B

Company : Mekatek Limited	**Permit: 0**

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	11.00	9.17	20.00	1.8
Organisation 40%	20.00	10.00	5.00	40.00	2.0
Enforcement History Penalty -up to 40%	-40.00	0.00	0.00	40.00	0.0
Overall average weighted score					**7.8**

Opra Banded Profile

Organisation Name:	Mekatek Limited
Case Number:	0

Attribute		Profile before any rules or capping applied		Opra Banded Profile used for charging	
		Number	Band	Number	Band
Complexity		1	A	1	A
		3	B	3	B
		0	C	0	C
		0	D	0	D
		0	E	0	E
Emissions	Air		-		-
	Water		A		A
	Land		-		-
	Sewer		-		-
	Waste Off Site		-		-
	Waste Input		C		C
Location			C		C
Operator Performance			B		B

Organisation Name:	Mekatek Limited	Case Number:	0

EPR Installations Application Charge Calculation

(excludes Compliance Rating)

Scoring Summary - Financial

Attribute	Band		Score	Total Score
Complexity	A	1	2	2
	B	3	15	45
	C	0	45	0
	D	0	82	0
	E	0	110	0
Emissions to Air	-			0
Emissions to Water	A			3
Emissions to Land	-			0
Emissions to Sewer	-			0
Emissions to Off-site Waste	-			0
Emissions - Waste Input	C			20
Location	C			20
Operator Performance	B			25
			Total Opra charging score	**115.00**

Indicative Fees & Charges

Application Fee	£	**24,265.00**
Subsistence Charge*	£	**11,730.00**
Substantial Variation	£	**13,340.00**
Standard Variation	£	**6,670.00**
Partial Surrender	£	**11,500.00**
Full Surrender	£	**14,950.00**
Closure	£	-

** Does not take into account Compliance Rating*

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	211
Subsistence	102
Substantial Variation	116
Standard Variation	58
Partial Surrender	100
Full Surrender	130
Closure (Landfill only)	

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	115
Including Compliance Rating	109.25
Subsistence Fee:	**£ 11,143.50**

MBG
Mekatek Business Group

Mekatek Limited

Appendix 2

Environmental Risk Assessment

Carmarthen Groundwater and Soil Contamination

ENVIRONMENTAL RISK ASSESSMENT DOCUMENT
CARMARTHEN GROUNDWATER AND SOIL CONTAMINATION

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2. RISK ASSESSMENT OF SPECIFIC AREAS 2

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2.1. Waste Transfer Station 4

2.3. Biological Effluent Treatment Operations 5

3. Conclusion 6

ENVIRONMENTAL RISK ASSESSMENT DOCUMENT
CARMARTHEN GROUNDWATER AND SOIL CONTAMINATION

1 INTRODUCTION

This document has been prepared for the operation of a waste treatment and recycling facility located at Amex Park, Llanstephan Road, Johnstown, Carmarthen, SA31 3NF.

The document provides a structured framework and approach in effectively identifying the potential for soil and groundwater contamination on the site.

For the purpose of assessing the risk the site was broken down into five distinct areas, these being detailed below:

- Administration and other buildings used for the use of general storage
- Baling, shredding and sorting operations
- General roadway infrastructure
- Oil Treatment
- Waste Transfer Station
- Biological Effluent Treatment Operations

From this breakdown we were able to discount areas which are not subject to waste operations and posed no risk to soil and groundwater, in particular to the use, production or release of relevant hazardous substances (as defined in Article 3(18) of the Industrial Emissions Directive). The discounted areas namely being:

- Administration and other buildings used for general storage
- Baling, shredding and sorting operations
- General roadway infrastructure

2 SPECIFIC RISK ASSESSMENT OF AREAS

2.1 Oil Treatment

Oil treatment operations are carried out in bunded areas with a sealed drainage system, this includes all sampling, inspection and unloading areas.
The operational areas of the site are inspected regularly by site management and site operators to ensure the integrity of the processing areas are sound, particular attention is given to the following areas:

- Condition of the bunded area
- Condition of the pipes and pumping equipment (transfer infrastructure)
- Condition of the storage tanks
- Condition of the processing equipment
- Condition of packages containing waste materials
- Labelling of tanks and packages containing waste materials
- Evidence of spillages

Due to the fact that the operations, including sampling, inspection and unloading are carried out within an impermeably bunded area with the benefit of sealed drainage the likelihood for soil or groundwater contamination from this activity can be rated as less then negligible.

2.2 Hazardous Waste Transfer Station

The hazardous waste transfer station operations are located in covered buildings with impermeable surfaces to mitigate the risk of contaminating rainwater.

Containers holding liquid waste material are stored in areas with sealed drainage or benefit from secondary containment.

Skips and other transit containers are stored on site in closed or covered containers to remove the risk of any uncontrolled discharge of contents or leaching from the contamination of rainwater.

Unloading and loading operations are carried out on an impermeable area, the drainage of which is directed to the on site biological effluent treatment plant so uncontrolled release to the environment is avoided. Drain blockers are available should these be required.

The operational area of the transfer station is inspected daily by the site chemist or site management to ensure that the integrity of the processing areas are sound, particular attention is given to the following areas:

- Condition of the storage area
- Condition of the processing equipment
- Condition of the sealed drainage system
- Labelling of packages containing waste materials
- Condition of the packages containing waste materials
- Evidence of spillages
- Adequate segregation of incompatible materials
- Turnover of waste materials

Based on the above approach the risk of soil and / or groundwater contamination from these processes can be rated as less then negligible.

2.3 Biological Effluent Treatment Operations

The biological effluent treatment operation treats incoming waste materials and also the site foul drainage system.

The following protection is in place to ensure environmental protection

- Incoming high strength bulk storage vessels are either bunded or located in an area of secondary containment – i.e. a bunded area.
- Sampling and off-loading takes place on an impermeable area with drainage which is sealed from free release to the environment.
- Pipework in place to transfer raw effluents are routed over areas with sealed drainage or secondary containment to ensure that uncontrolled release to the environment is not possible.

Based on the above approach the risk of soil and / or groundwater contamination from these processes can be rated as less then negligible.

3 Conclusion

The findings of this risk-based exercise has identified that the potential for soil and / or groundwater contamination on the site is rated as less then negligible.

There is no permit condition which requires periodic monitoring to be carried out on site. However, in line with best practice it is the intention of the operator to introduce a 'Groundwater and Soil Monitoring Programme' within 12 months of this QP.

Following the initial baseline monitoring the ongoing frequency of the monitoring will be subject to the below programme:

Groundwater	-	Every five years
Soil	-	Every ten years