

Operational Risk Appraisal (Opra) for Installations under EPR



Organisation Name	TRW Automotive, New Inn, Pontypool
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Case Number	EPR/DP3430LX/V002
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Version	3.9
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Opra Scheme Version 3.9

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 queries about the scheme or the operation of the spreadsheet,
please contact the Environment Agency by email:
opra@environment-agency.gov.uk

For EA Use

☐ Consolidated Permit

Listed Activities - Complexity Attribute

Organisation: RW Automotive, New Inn, Pontypool
Case Number: EPR/DP3430LX/V002

	Description of Activity	Schedule 1 Reference	Regulatory Complexity
1	Acid Zinc Line	2.3 Part A (1) a)	A
2	Acid Zinc Nickel Line	2.3 Part A (1) a)	A
3	Effluent Treatment Process	5.3 Part A (1) a) (ii)	B
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	2
B	1
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:	TRW Automotive, New Inn, Pontypool	If there is insufficient space please attach a paper record
Case Number:	EPR/DP3430LX/V002	

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
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List of Schedule 1 Part (A) 2 and Part B Activities included in the Installation		
	Enter description of Activity	Schedule 1 Reference
1	Anodising Process (Caliper)	2.3 Part B a)
2	Anodising (Acid Etch Tank)	2.3 Part B a)
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	TRW Automotive, New Inn, Pontypool
Permit	EPR/DP3430LX/V002

	Description / Aggregation Group	Schedule 1 Ref	Complexity	Rule 3 Capping	Rule 5 not applied	Rule 6 not applied	Rule 7 Not Applied
1	Effluent Treatment Process	5.3 Part A (1) a) (ii)	B	B	B	B	B
2	Acid Zinc Line	2.3 Part A (1) a)	A	A	A	A	A
3	Acid Zinc Nickel Line	2.3 Part A (1) a)	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	Total
A	2	0	2
B	1	0	1
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)
2
1
0
0
0

Emissions Attribute - Releases to Air

Organisation Name:	TRW Automotive, New Inn, Pontypool
Case Number:	EPR/DP3430LX/V002

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		0	
Oxides of Nitrogen	Tonnes Year	10		0	
Carbon Monoxide	Tonnes Year	1000		0	
Beryllium	Kg year	1		0	
Cadmium	Kg year	1		0	
Lead	Kg year	1		0	
Mercury	Kg year	1		0	
Antimony	Kg year	10		0	
Arsenic	Kg year	10		0	
Chromium	Kg year	10		0	
Nickel	Kg year	10		0	
Selenium	Kg year	10		0	
Other Metals Specify					
	Kg year	100		0	
	Kg year	100		0	
	Kg year	100		0	
	Kg year	100		0	
	Kg year	100		0	
Organic Compounds					
Dioxins and Furans	mg TEQ year	0.1		0	
PCBs	mg TEF year	0.1		0	
PAHs as benzo(a)pyrene	Kg year	1		0	
Phosgene	Kg year	1		0	
Isocyanates	Kg year	1		0	
Di-ethyl sulphate	Kg year	1		0	
Di-methyl sulphate	Kg year	1		0	
Acrylonitrile	Kg year	10		0	
Aniline	Kg year	10		0	
Benzene	Kg year	10		0	
Benzyl Chloride	Kg year	10		0	
1-chloro-2,3-epoxypropane	Kg year	10		0	
Chloroform	Kg year	10		0	
Cyanamide	Kg year	10		0	
Ethylene oxide	Kg year	10		0	
Formaldehyde	Kg year	10		0	
Maleic anhydride	Kg year	10		0	
Nitrobenzene	Kg year	10		0	
Allyl alcohol	Kg year	10		0	
Acetaldehyde	Kg year	100		0	
Acetonitrile	Kg year	100		0	
Benzene-1,2,4-tricarboxylic acid,1,2-anhydride	Kg year	100		0	
1,3-butadiene	Kg year	100		0	
Chloroethene	Kg year	100		0	
1,2-dichloroethane	Kg year	100		0	
Dimethylformamide	Kg year	100		0	
1,4-dioxane	Kg year	100		0	
2-ethoxyethanol	Kg year	100		0	
2-ethoxyethylecetate	Kg year	100		0	
Ethyl acrylate	Kg year	100		0	
Iodomethane	Kg year	100		0	
Methylamine	Kg year	100		0	
2-nitropropane	Kg year	100		0	
Phenol	Kg year	100		0	

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Propylene oxide	Kg year	100		0	
HFC's	Kg year	100		0	
HCFC's	Kg year	100	missions to Air	0	
PFC's	Kg year	100		0	
	Kg year				
Benzaldehyde	Kg year	500		0	
Benzo(a)pyrene	Kg year	500		0	
Butene	Kg year	500		0	
Chloromethane	Kg year	500		0	
1,4-dichlorobenzene	Kg year	500		0	
Dichloromethane	Kg year	500		0	
Ethyl toluene	Kg year	500		0	
Ethylene	Kg year	500		0	
i-butyraldehyde	Kg year	500		0	
Methyl bromide	Kg year	500		0	
Pentene	Kg year	500		0	
Propene	Kg year	500		0	
Styrene	Kg year	500		0	
Tetrachloroethane	Kg year	500		0	
Tetrachloroethene	Kg year	500		0	
Toluene diamine	Kg year	500		0	
1,1,1-trichloroethane	Kg year	500		0	
Trichloroethylene	Kg year	500		0	
Trichlorotoluene	Kg year	500		0	
Trimethylbenzene	Kg year	500		0	
Xylene	Kg year	500		0	
Other VOCs specify					
	Kg year	1000		0	
	Kg year	1000		0	
	Kg year	1000		0	
	Kg year	1000		0	
	Kg year	1000		0	
Inorganics					
Fluorine	Kg year	10		0	
Chlorine	Kg year	10		0	
Bromine	Kg year	10		0	
Iodine	Kg year	10		0	
Hydrogen Fluoride	Kg year	10		0	
Hydrogen Bromide	Kg year	10		0	
Hydrogen Iodide	Kg year	10		0	
Hydrogen Chloride	Kg year	1000		0	
Hydrogen Sulphide	Kg year	10		0	
Ammonia	Kg year	100		0	
Carbon Disulphide	Kg year	100		0	
Particulates	Kg year	100		0	
Other inorganic compounds specify					
Table A1 Substances	Kg year	0.1		0	
Table A2 Substances	Kg year	1		0	
Table A3 Substances	Kg year	10		0	
Table A4 Substances	Kg year	100		0	
Table A5 Substances	Kg year	1000		0	
Commercial in Confidence					
If you need to use these entries please contact your local EA office					
				0	
				0	
				0	
				0	
			Total	0	

Emissions Attribute - Releases to Water

Organisation Name:	V Automotive, New Inn, Ponty	Please check that the data is entered in the correct units.
Case Number:	EPR/DP3430LX/V002	The Emission Index will only show if the data entered exceeds the threshold.

Please tick box if this sheet is applicable

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Substance	Units	Emission Threshold	Maximum Quantity	Emission Index	Notes
Aldrin	Kg year	0.001		0	
Azinphos-ethyl	Kg year	0.001		0	
DDT all isomers	Kg year	0.001		0	
Endosulfan	Kg year	0.001		0	
Endrin	Kg year	0.001		0	
Fenitrothion	Kg year	0.001		0	
Fenthion	Kg year	0.001		0	
Isodrin	Kg year	0.001		0	
Malathion	Kg year	0.001		0	
Parathion	Kg year	0.001		0	
Azinphos-methyl	Kg year	0.01		0	
Chlorfenvinphos	Kg year	0.01		0	
Diazinon	Kg year	0.01		0	
Dieldrin	Kg year	0.01		0	
Hexachlorobenzene	Kg year	0.01		0	
Hexachlorocyclohexanes	Kg year	0.01		0	
Hexachlorobutadiene	Kg year	0.01		0	
Mevinphos	Kg year	0.01		0	
Omethoate	Kg year	0.01		0	
Parathion methyl	Kg year	0.01		0	
Permethrin	Kg year	0.01		0	
Polychlorinated biphenyls	Kg year	0.01		0	
Triazophos	Kg year	0.01		0	
Tributyltin compounds	Kg year	0.01		0	
Trifluralin	Kg year	0.01		0	
Triphenyltin compounds	Kg year	0.01		0	
Atrazin	Kg year	0.1		0	
Pentachlorophenol and its compound	Kg year	0.1		0	
Simazine	Kg year	0.1		0	
Trichlorobenzene all isomers	Kg year	0.1		0	
Benzene	Kg year	1		0	
Bentazone	Kg year	1		0	
Biphenyl	Kg year	1		0	
Carbon Tetrachloride	Kg year	1		0	
Chloroform	Kg year	1		0	
Chloronitrotoluenes	Kg year	1		0	
4-Chloro-3-Methylphenol	Kg year	1		0	
2-Chlorophenol	Kg year	1		0	
2,4 D non-ester	Kg year	1		0	
2,4 D ester	Kg year	1		0	
Demeton	Kg year	1		0	
1,2-Dichloroethane	Kg year	1		0	
Dimethoate	Kg year	1		0	
Linuron	Kg year	1		0	
Mecoprop	Kg year	1		0	
Napthalene	Kg year	1		0	
Tetrachloroethylene	Kg year	1		0	
1,1,1-Trichloroethane	Kg year	1		0	
1,1,2-Trichloroethane	Kg year	1		0	
Cadmium	Kg year	1		0	
Mercury	Kg year	1		0	
Nonylphenol Ethoxylate	Kg year	20		0	
Nonylphenols	Kg year	20		0	
Octylphenols	Kg year	20		0	
Toluene	Kg year	20		0	
1,2-Dichloroethylene	Kg year	20		0	
Xylenes	Kg year	20		0	
Arsenic	Kg year	20		0	
Chromium	Kg year	20		0	

Copper	Kg year	20		0	
Lead	Kg year	20		0	
Nickel	Kg year	20	sions to wat	0	
Zinc	Kg year	20		0	
All consented substances not listed above					
specify					
Table W1 Substances	Kg year	0.01		0	
Table W2 Substances	Kg year	0.1		0	
Table W3 Substances	Kg year	1		0	
Table W4 Substances	Kg year	20		0	
Table W5 Substances	Kg year	100		0	
	Kg year			0	
	Kg year			0	
	Kg year			0	
Commercial in Confidence					
If you need to use these entries please contact your local EA office					
				0	
				0	
				0	
				0	
			Total	0	

Emissions Attribute Releases to Land

Organisation Name: bomotive, New Inn, Pontypool
Case Number: PR/DP3430LX/V002

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

Organisation Name:	W Automotive, New Inn, Pontypool	Please check that the data is entered in the correct units.
Case number:	EPR/DP3430LX/V002	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
Aldrin	Kg year	0.001		0	
Azinphos-ethyl	Kg year	0.001		0	
DDT all isomers	Kg year	0.001		0	
Endosulfan	Kg year	0.001		0	
Endrin	Kg year	0.001		0	
Fenitrothion	Kg year	0.001		0	
Fenthion	Kg year	0.001		0	
Isodrin	Kg year	0.001		0	
Malathion	Kg year	0.001		0	
Parathion	Kg year	0.001		0	
Azinphos-methyl	Kg year	0.01		0	
chlorfenvinphos	Kg year	0.01		0	
Diazinon	Kg year	0.01		0	
Dieldrin	Kg year	0.01		0	
Hexachlorobenzene	Kg year	0.01		0	
Hexachlorocyclohexanes	Kg year	0.01		0	
Hexachlorobutadiene	Kg year	0.01		0	
Mevinphos	Kg year	0.01		0	
Omethoate	Kg year	0.01		0	
Parathion methyl	Kg year	0.01		0	
Permethrin	Kg year	0.01		0	
Polychlorinated biphenyls	Kg year	0.01		0	
Triazophos	Kg year	0.01		0	
Tributyltin compounds	Kg year	0.01		0	
Trifluralin	Kg year	0.01		0	
Triphenyltin compounds	Kg year	0.01		0	
Atrazin	Kg year	0.1		0	
Pentachlorophenol and its compound	Kg year	0.1		0	
Simazine	Kg year	0.1		0	
Trichlorobenzene all isomers	Kg year	0.1		0	
Benzene	Kg year	1		0	
Bentazone	Kg year	1		0	
Biphenyl	Kg year	1		0	
Carbon Tetrachloride	Kg year	1		0	
Chloroform	Kg year	1		0	
Chloronitrotoluenes	Kg year	1		0	
4-Chloro-3-Methylphenol	Kg year	1		0	
2-Chlorophenol	Kg year	1		0	
2,4 D non-ester	Kg year	1		0	
2,4 D ester	Kg year	1		0	
Demeton	Kg year	1		0	
1,2-Dichloroethane	Kg year	1		0	
Dimethoate	Kg year	1		0	
Linuron	Kg year	1		0	
Mecoprop	Kg year	1		0	
Napthalene	Kg year	1		0	
Tetrachloroethylene	Kg year	1		0	
1,1,1-Trichloroethane	Kg year	1		0	
1,1,2-Trichloroethane	Kg year	1		0	
Cadmium	Kg year	1		0	
Mercury	Kg year	1		0	
Nonylphenol Ethoxylate	Kg year	20		0	
Nonylphenols	Kg year	20		0	
Octylphenols	Kg year	20		0	
Toluene	Kg year	20		0	
Trichloroethylene	Kg year	20		0	
Xylenes	Kg year	20		0	
Arsenic	Kg year	20		0	
Chromium	Kg year	20		0	
Copper	Kg year	20		0	
Lead	Kg year	20		0	
Nickel	Kg year	20		0	
Zinc	Kg year	20	128	6	Based on average concentration of 3.45 throughout 2014 with an annual effluent usage of 37204m3
All consented substances not listed above specify					
Chemical Oxygen Demand	Kg year	10000		0	
Suspended Solids	Kg year	10000		0	
Table S1 Substances	Kg year	0.01		0	
Table S2 Substances	Kg year	0.1		0	
Table S3 Substances	Kg year	1		0	
Table S4 Substances	Kg year	20		0	
Table S5 Substances	Kg year	100		0	
Commercial in Confidence					
If you need to use these entries please contact your local EA office					
				0	
				0	
				0	
				0	
		Total		6	
		Weighting Factor			(Weighting factor = 0.33)
		Weighted Total		2	

Emissions Attribute - Off-site Disposals of Waste

Organisation Name: omotive, New Inn, Pontypool
Case Number: PR/DP3430LX/V002

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	386.76	4	381.72 tonnes of hazardous liquids process chemicals & 4.98 tonnes solid haz waste
Non hazardous waste (biodegradable)	Tonnes year	100		0	
		Total		4	
		Weighting Factor			(Weighting factor = 0.33)
		Weighted Total		1	

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

Company omotive, New Inn, Pontypool
Permit PR/DP3430LX/V002

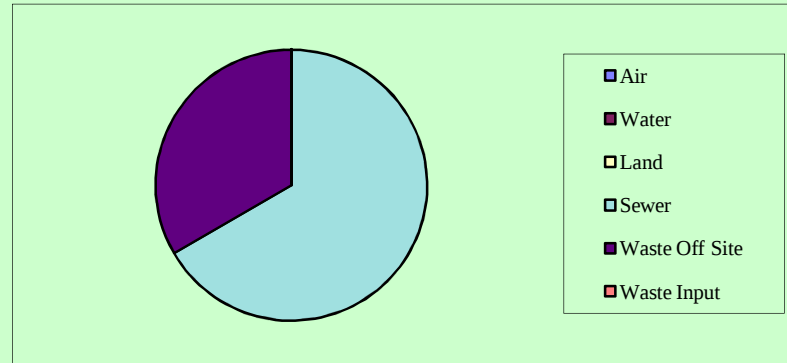
Please check that the data is entered in the correct units.
 The Emission Index will only show if the data entered exceeds the threshold.

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				1	

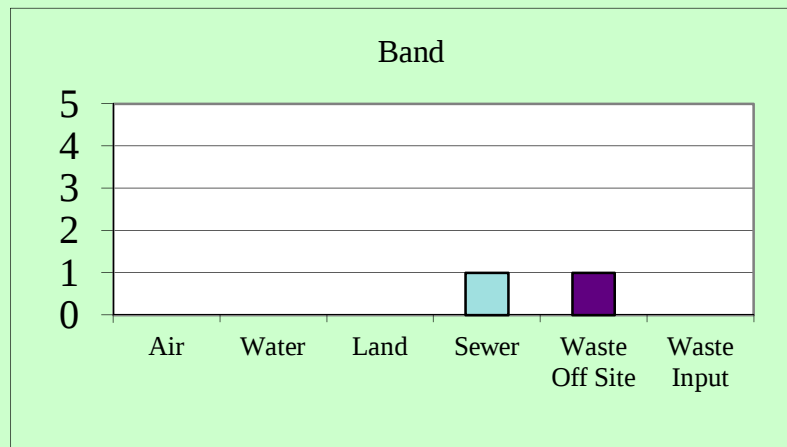
Emissions Attribute Summary Sheet

Organisation: Automotive, New Inn, Pontypool
Case Number: EPR/DP3430LX/V002

Pathway	Overall Emission Index
Air	0
Water	0
Land	0
Sewer	2
Waste Off Site	1
Waste Input	0



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

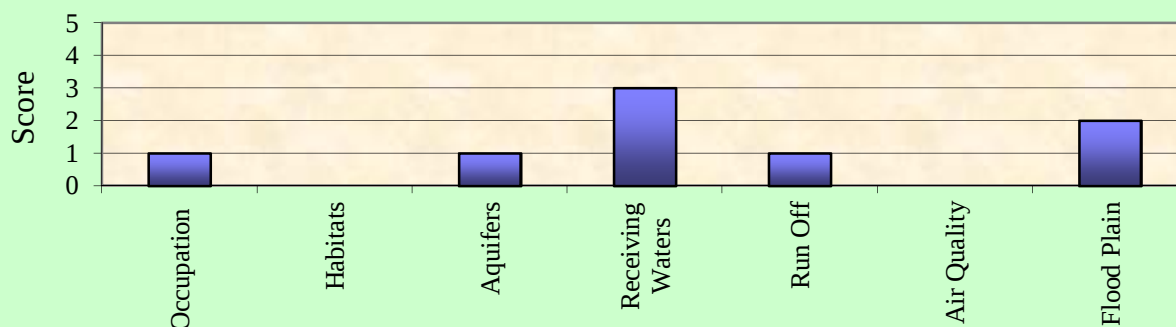


Location Attribute

Organisation Name:	RW Automotive, New Inn, Pontypool
Case Number:	EPR/DP3430LX/V002

Parameter	Yes/No	Available	Score
Human Occupation/Presence:			
a) if within 50m of the boundary	No	5	1
or:			
b) if greater than 50m but less than 250m of boundary	No	3	
or:			
c) if greater than 250m but less than 1km of boundary	Yes	1	
Statutory sites designated under Habitats Directive or CROW Act 2000:			
a) if "relevant" under Habitats Directive	No	3	0
or			
b) if CROW Act 2000 assessment required	No	2	
a) if on an aquifer and within a Groundwater Protection Zone	No	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:			
a) grade 5	No	1	3
b) river category grade 4 or 3	No	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	No	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	No	2	
or			
c) as a) except do not emit pollutants that have been declared for the AQMZ	No	1	
If within a flood plain	Yes	2	2
Maximum Score = 20	Total		8
Band A = 0 - 4, B = 5 - 8, C = 9 - 12, D = 13 - 17 and E = 18 - 20	Band		B

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	Refer to TRW Corporate EMS and section 2.1 of main application - Responsibility of HS&E Manager	
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	Refer to TRW Corporate EMS and section 2.1 of main application - Responsibility of HS&E Manager	
3	Are there documented procedures for monitoring emissions or impacts?	Yes	2.0	2.0	Refer to TRW Corporate EMS and section 2.1 of main application - Responsibility of HS&E	
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	Refer to TRW Corporate EMS and section 2.1 of main application - Responsibility of HS&E Manager	
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	Refer to TRW Corporate EMS and section 2.1 of main application - Responsibility of HS&E Manager	
6	Do the operations and maintenance systems include auditing environmental performance?	Yes	2.0	2.0	Refer to TRW Corporate EMS and section 2.1 of main application - Responsibility of HS&E Manager	
7	Are the reports, results and recommendations arising from audits made available to senior management on a regular basis?	Yes	2.0	2.0	Refer to TRW Corporate EMS and section 2.1 of main application - Responsibility of HS&E Manager	
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?	Yes	-3.0	-3.0	Release in Dec '14	
Operations and Maintenance Total			12.0	9.0	75.0%	1.5

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	Refer to TRW Corporate EMS and section 2.1 of main application - Responsibility of HS&E Manager	
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; ☐ likely potential environmental impacts which may be caused by plant under their control. This should cover both normal and abnormal circumstances; ☐ reporting procedures to inform supervisors or managers of deviations from permit conditions;	Yes	2.0	2.0	Refer to TRW Corporate EMS and section 2.1 of main application - Responsibility of HS&E Manager	
	☐ 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	Refer to TRW Corporate EMS and section 2.1 of main application - Responsibility of HS&E Manager	09/12/2015

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)
	☐ prevention of accidental emissions and action to be taken when accidental emissions occur?	Yes	2.0	2.0	Refer to TRW Corporate EMS and section 2.1 of main application - Responsibility of HS&E Manager	
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	Refer to TRW Corporate EMS and section 2.1 of main application - Responsibility of HS&E Manager	
4	Do the key posts include contractors, those responsible for liaising with contractors and those purchasing equipment and materials?	Yes	1.0	1.0	Refer to TRW Corporate EMS and section 2.1 of main application - Responsibility of HS&E Manager	
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	Refer to TRW Corporate EMS and section 2.1 of main application - Responsibility of HS&E Manager	
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)		-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%

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	Refer to TRW Corporate EMS and section 2.9 of main application - Responsibility of HS&E Manager	
2	Has the plan identified areas where improvement is needed?	Yes	1.0	1.0	Refer to TRW Corporate EMS and section 2.9 of main application - Responsibility of HS&E	
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	Refer to TRW Corporate EMS and section 2.9 of main application - Responsibility of HS&E Manager	
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	Refer to TRW Corporate EMS and section 2.9 of main application - Responsibility of HS&E Manager	
5	Are there written procedures for handling, investigating, communicating and reporting environmental complaints?	Yes	1.0	1.0	Refer to TRW Corporate EMS and section 2.9 of main application - Responsibility of HS&E Manager	
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	Refer to TRW Corporate EMS and section 2.9 of main application - Responsibility of HS&E Manager	
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		09/12/2015

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	Refer to TRW Corporate EMS and section 2.9 of main application - Responsibility of HS&E Manager	
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	Cert. No. 002679UM Valid from 08/05/15 to 07/05/18	
1.3	Is your system an Environmental Management 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 :					
	☐ includes a commitment to continual improvement and prevention of pollution?		1.0	0.0		
	☐ includes a commitment to comply with relevant legislation, and with other requirements that the organisation subscribes to?		1.0	0.0		
	☐ 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):					
	☐ the control of process change on the installation;		1.0	0.0		
	☐ design and review of new facilities (including provision for their decommissioning), engineering and other capital projects;		1.0	0.0		
	☐ capital approval;		1.0	0.0		
	☐ 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 requirement for EMAS.	Yes	1.0	1.0		

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	16.00		

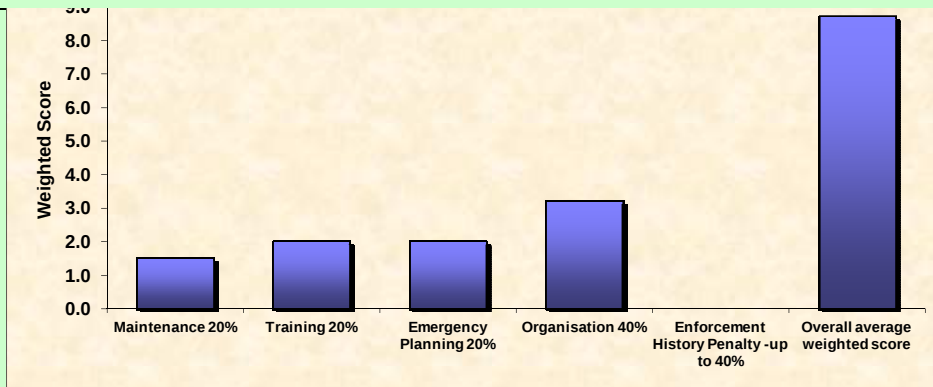
Enforcement History (0 to -40% weighting)

					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					0	
	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			
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 : TRW Automotive, New Inn, Pontypool

Permit: EPR/DP3430LX/V002

Data calculations generating the above graph

Summary	Max	Score from above	Normalised to scale out of 10	Weighting	Weighted score
Maintenance 20%	12.00	9.00	7.50	20.00	1.5
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	16.00	8.00	40.00	3.2
Enforcement History Penalty -up to 40%	-40.00	0.00	0.00	40.00	0.0
Overall average weighted score					8.7

Opra Banded Profile

Organisation Name:	TRW Automotive, New Inn, Pontypool
Case Number:	EPR/DP3430LX/V002

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

Organisation Name: TRW Automotive, New Inn, Pontypool Case Number: EPR/DP3430LX/V002

EPR Installations Application Charge Calculation

(excludes Compliance Rating)

Scoring Summary - Financial



Attribute	Band	Score	Total Score
Complexity	A	2	4
	B	1	15
	C	0	0
	D	0	0
	E	0	0
Emissions to Air	-		0
Emissions to Water	-		0
Emissions to Land	-		0
Emissions to Sewer	A		1
Emissions to Off-site Waste	A		1
Emissions - Waste Input	-		0
Location	B		10
Operator Performance	A		10
Total Opra charging score			41.00

Indicative Fees & Charges

☒ England ☐ Wales

Application Fee	£	8,241.00
Subsistence Charge*	£	4,018.00
Substantial Variation	£	4,510.00
Standard Variation	£	2,296.00
Partial Surrender	£	3,936.00
Full Surrender	£	5,084.00
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	201
Subsistence	98
Substantial Variation	110
Standard Variation	56
Partial Surrender	96
Full Surrender	124
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	41
Including Compliance Rating	38.95

Subsistence Fee:	£ 3,817.10
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