

# Operational Risk Appraisal (Opra) for Installations under EPR



**Organisation Name** **MVV Environment  
Devonport Ltd**

**Case Number** **EPR/WP3833FT/A001**

**Version** **3.6**

**Opra Scheme Version 3.6**

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](mailto:opra@environment-agency.gov.uk)

For EA Use

Consolidated Permit

### Listed Activities - Complexity Attribute

**Organisation:** MVV Environment Devonport Ltd  
**Case Number:** EPR/WP3833FT/A001

	Description of Activity	Schedule 1 Reference	Regulatory Complexity
1	Energy From Waste CHP Plant	5.1 Part A (1) c)	E
2			
3			
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	0
B	0
C	0
D	0
E	1

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 - see Chapter 4**

<b>Organisation Name:</b>	MVV Environment Devonport Ltd	If there is insufficient space please attach a paper record
<b>Case Number:</b>	EPR/WP3833FT/A001	

**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				

<b>Rule 4</b>	<b>Not Applied</b>
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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		
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**

<b>Company</b>	MVV Environment Devonport Ltd
<b>Permit</b>	EPR/WP3833FT/A001

	Description / Aggregation Group	Schedule 1 Ref	Complexity	Rule 3 Capping	Rule 5 not applied	Rule 6 not applied	Rule 7 Not Applied
1	Energy From Waste CHP Plant	5.1 Part A (1) c)	E	E	E	E	E
2							
3							
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	0	0	0
B	0	0	0
C	0	0	0
D	0	0	0
E	1	0	1
Capped	0	0	0

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

## Emissions Attribute - Releases to Air

<b>Organisation Name:</b>	MVV Environment Devonport Ltd
<b>Case Number:</b>	EPR/WP3833FT/A001

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	88.06	9	All emissions calculated at WID limits assuming 8760hr operations and max discharge rate of 55.85 m3/s (standardised, dry basis)
Oxides of Nitrogen	Tonnes Year	10	352.26	35	
Carbon Monoxide	Tonnes Year	1000		0	
Beryllium	Kg year	1		0	
Cadmium	Kg year	1	88.06	88	
Lead	Kg year	1	880.64	881	
Mercury	Kg year	1	88.06	88	
Antimony	Kg year	10	880.64	88	
Arsenic	Kg year	10	880.64	88	
Chromium	Kg year	10	880.64	88	
Nickel	Kg year	10	880.64	88	
Selenium	Kg year	10		0	
<b>Other Metals Specify</b>					
	Kg year	100		0	
	Kg year	100		0	
	Kg year	100		0	
	Kg year	100		0	
	Kg year	100		0	
<b>Organic Compounds</b>					
Dioxins and Furans	mg TEQ year	0.1		0	
PCBs	mg TEF year	0.1		0	
PAHs as benzo(a)pyrene	Kg year	1	1.76	2	
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-ethoxyethylacetate	Kg year	100		0	
Ethyl acrylate	Kg year	100		0	
Iodomethane	Kg year	100		0	

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Methylamine	Kg year	100		0
2-nitropropane	Kg year	100		0
Phenol	Kg year	100	missions to Air	0
Propylene oxide	Kg year	100		0
HFC's	Kg year	100		0
HCFC's	Kg year	100		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
<b>Other VOCs specify</b>				
Total VOCs	Kg year	1000	17613	18
	Kg year	1000		0
	Kg year	1000		0
	Kg year	1000		0
	Kg year	1000		0
<b>Inorganics</b>				
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	1761	176
Hydrogen Bromide	Kg year	10		0
Hydrogen Iodide	Kg year	10		0
Hydrogen Chloride	Kg year	1000	17613	18
Hydrogen Sulphide	Kg year	10		0
Ammonia	Kg year	100	17613	176
Carbon Disulphide	Kg year	100		0
Particulates	Kg year	100	17613	176
<b>Other inorganic compounds specify</b>				
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
<b>Comercial in Confidence</b>				
<b>If you need to use these entries please contact your local EA office</b>				
				0
				0
				0
				0
			<b>Total</b>	<b>2018</b>

## Emissions Attribute - Releases to Water

<b>Organisation Name:</b>	VV Environment Devonport	Please check that the data is entered in the correct units.
<b>Case Number:</b>	EPR/WP3833FT/A001	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	sions to wa	0
Zinc	Kg year	20		0
<b>All consented substances not listed above specify</b>				
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
<b>Comercial in Confidence</b>				
<b>If you need to use these entries please contact your local EA office</b>				
				0
				0
				0
				0
			<b>Total</b>	<b>0</b>



## Emissions Attribute Releases to Land

**Organisation Name:** Environment Devonport Ltd  
**Case Number:** PR/WP3833FT/A001

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	
			<b>Total</b>	<b>0</b>	



### Emissions Attribute - Off-site Disposals of Waste

<b>Organisation Name:</b>	nvironment Devonport 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.
<b>Case Number:</b>	PR/WP3833FT/A001	

Substance	Units	Emission Threshold	Maximum Quantity	Emission Index	Notes
Inert waste	Tonnes year	1000		0	
Non hazardous waste (non biodegradable)	Tonnes year	350	2671	8	Bottom Ash to landfill
Hazardous waste	Tonnes year	100	8745	87	APC residue
Non hazardous waste (biodegradable)	Tonnes year	100		0	
Total				95	
Weighting Factor					(Weighting factor = 0.33)
<b>Weighted Total</b>				<b>31</b>	

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

<b>Company</b>	nvironment Devonport 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.
<b>Permit</b>	PR/WP3833FT/A001	

Substance	Units	Emission Threshold	Maximum Quantity	Emission Index	Notes
Inert waste	Tonnes year	1000		0	
Non hazardous waste (non biodegradable)	Tonnes year	350	59584	170	Bottom Ash = 50759 T sent for aggregate recycling and 8825 tonnes metals
Hazardous waste	Tonnes year	100		0	
Non hazardous waste (biodegradable)	Tonnes year	100		0	
Total				170	
Weighting Factor					(Weighting factor = 0.1)
<b>Weighted Total</b>				<b>17</b>	
<b>Off-Site Total</b>				<b>48</b>	

The table below should only be completed for operations which are specified waste management activities other than landfill. For these activities the Off-Site Waste tables above should be left blank

### Emissions Attribute - Waste Input

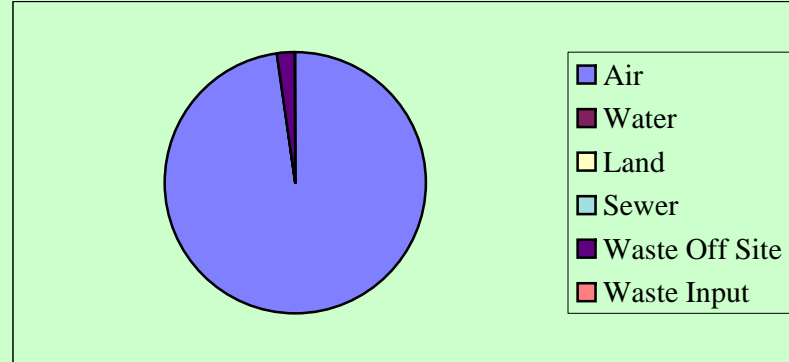
<b>Company</b>	nvironment Devonport Ltd	Please check that the data is entered in the correct units. The Emission Index will only show if the data entered exceeds the threshold.
<b>Permit</b>	PR/WP3833FT/A001	

Substance	Units	Emission Threshold	Maximum Quantity	Emission Index	Notes
Inert waste	Tonnes year	1000		0	
Non hazardous waste (non biodegradable)	Tonnes year	750		0	Other Waste (commercial, household bulky litter, fly-tipped and other waste)
Hazardous waste	Tonnes year	250		0	
Non hazardous waste (biodegradable)	Tonnes year	500		0	Contract Waste (household residual, HWRC residual and composting residues)
<b>Waste Input Total</b>				<b>0</b>	

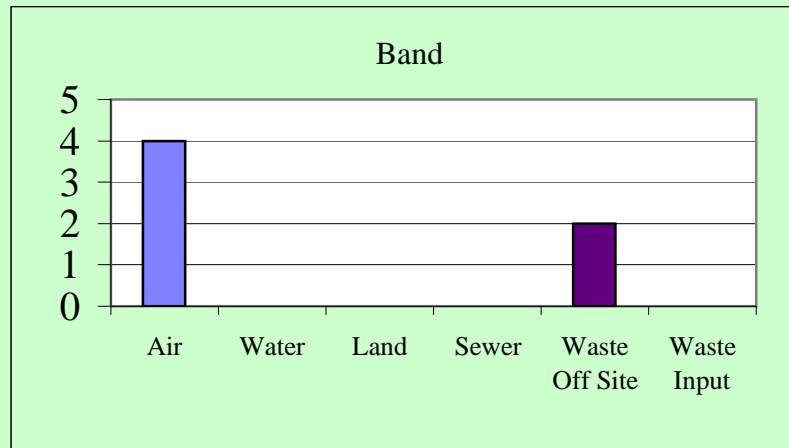
## Emissions Attribute Summary Sheet

**Organisation:** V Environment Devonport Ltd  
**Case Number:** EPR/WP3833FT/A001

Pathway	Overall Emission Index
Air	2018
Water	0
Land	0
Sewer	0
Waste Off Site	48
Waste Input	0



Pathway	Band	
	Band 1	Band 2
Air	4	D
Water	0	-
Land	0	-
Sewer	0	-
Waste Off Site	2	B
Waste Input	0	-

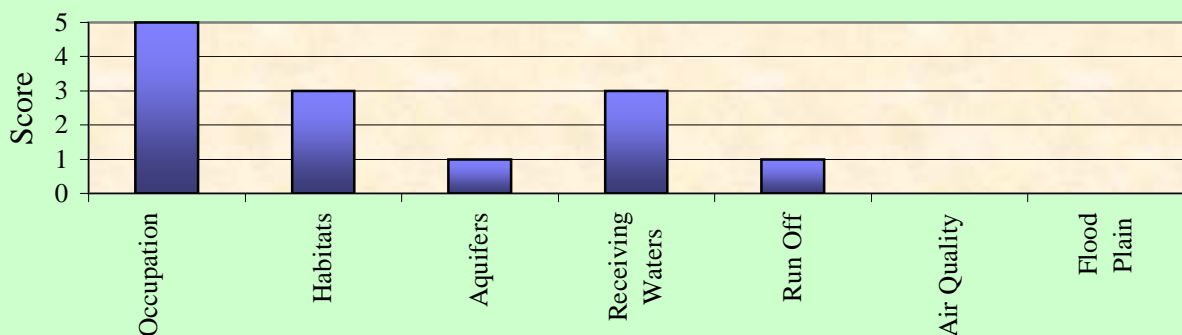


## Location Attribute

<b>Organisation Name:</b>	MVV Environment Devonport Ltd
<b>Case Number:</b>	EPR/WP3833FT/A001

Parameter	Yes/No	Available	Score
<b>Human Occupation/Presence:</b>			
a) if within 50m of the installation site boundary	<input type="text" value="Yes"/>	5	5
<b>or:</b>			
b) if greater than 50m but less than 250m of boundary	<input type="text"/>	3	
<b>or:</b>			
c) if greater than 250m but less than 1km of boundary	<input type="text"/>	1	
<b>Statutory sites designated under Wildlife and Countryside, Habitats legislation:</b>			
a) if a Habitats "appropriate assessment" is required	<input type="text" value="Yes"/>	3	3
<b>or</b>			
b) if only CROW Act 2000 assessment required	<input type="text"/>	2	
a) if on an aquifer and within a Groundwater Protection Zone	<input type="text"/>	2	1
<b>or</b>			
b) if on an aquifer and not within a Groundwater Protection Zone (Data obtained from Agency Published Guidance)	<input type="text" value="Yes"/>	1	
<b>Sensitivity of receiving waters (information available from Agency's "Whats in my back yard" web site), if:</b>			
	<a href="#">Whats in my back yard</a>		
a) grade 5	<input type="text"/>	1	3
b) river category grade 4 or 3	<input type="text"/>	2	
c) river category grade 2 or 1 or estorial	<input type="text" value="Yes"/>	3	
a) If there are direct runs off to water without interceptors or other active control measures	<input type="text"/>	2	1
<b>or</b>			
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
<b>or</b>			
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	
<b>or</b>			
c) as a) except do not emit pollutants that have been declared for the AQMZ	<input type="text" value="No"/>	1	
If within a flood plain	<input type="text" value="No"/>	2	0
Maximum Score = 20		<b>Total</b>	<b>13</b>
Band A = 0 - 4, B = 5 - 8, C = 9 - 12, D = 13 - 17 and E = 18 - 20		<b>Band</b>	<b>D</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 sys 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	IMS Manual supported by individual working and operating instructions	
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	MVV Maintenance Strategy supported by Preventative Maintenance Plans and Schedules	
3	Are there documented procedures for monitoring emissions or impacts?	Yes	2.0	2.0	IMS Manual supported by individual working and operating instructions	
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	MVV Maintenance Strategy supported by Preventative Maintenance Plans and Schedules	
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	MVV Maintenance Strategy supported by Preventative Maintenance Plans and Schedules	
6	Do the operations and maintenance systems include auditing environmental performance?	Yes	2.0	2.0	MVV Environmental Protection Audit	
7	Are the reports, results and recommendations arising from audits made available to senior management on a regular basis?	Yes	2.0	2.0	IMS Records	
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		
<b>Operations and Maintenance Tota</b>			<b>12.0</b>	<b>12.0</b>	<b>100.0%</b>	<b>2.0</b>

### 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: <ul style="list-style-type: none"> <li><input type="checkbox"/> Identifies all posts for which specific environmental awareness training is required; and</li> <li><input type="checkbox"/> Identifies the scope and level to which such training is to be given?</li> </ul>	Yes	3.0	3.0	Organisation Manual - Training Needs Matrix	
2	Are training systems in place for all relevant staff that cover the following factors: <ul style="list-style-type: none"> <li><input type="checkbox"/> the regulatory requirements associated with the Permit as they affect their work activities and responsibilities;</li> <li><input type="checkbox"/> likely potential environmental impacts which may be caused by plant under their control. This should cover both normal and abnormal circumstances;</li> <li><input type="checkbox"/> reporting procedures to inform supervisors or managers of deviations from permit conditions;</li> <li><input type="checkbox"/> procedures to be used by supervisors or managers and for the reporting of deviations from permit conditions to the Agency; and</li> </ul>	Yes	2.0	2.0	Organisation Manual - supported by relevant training programmes	
		Yes	2.0	2.0	Organisation Manual - supported by relevant training programmes	
		Yes	1.0	1.0	Organisation Manual - supported by relevant training programmes	
		Yes	2.0	2.0	Organisation Manual - supported by relevant training programmes	06/06/2011

## 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	Organisation Manual - supported by relevant training programmes	
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	Detailed Job Descriptions, competency matrix and training records	
4 Do the key posts include contractors, those responsible for liaising with contractors and those purchasing equipment and materials?	Yes	1.0	1.0	Organisation Manual	
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	Organisation Manual	
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 If there industry standards for training in this sector (e.g. WAMITAB) if so do you apply them? (If no industry standards please leave blank)	Yes	-2.0	0.0	WAMITAB	To be in place prior to plant operation commencing
8 Are individual and organisational training needs reviewed on a regular (e.g. annual) basis?	Yes	2.0	2.0	Organisation Manual	
<b>Competence Training Total</b>		<b>17.0</b>	<b>17.0</b>		

### Emergency planning - 20%

<p><b>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:</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> the likelihood of, and the actions to be taken to minimise, these potential occurrences;</li> <li><input type="checkbox"/> the environmental consequences and an action plan to deal with such occurrences;</li> <li><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.</li> <li><input type="checkbox"/> In the case of abnormal emissions the operator shall               <ul style="list-style-type: none"> <li><input type="checkbox"/> investigate and undertake remedial action immediately;</li> <li><input type="checkbox"/> promptly record the events and actions taken; and</li> <li><input type="checkbox"/> ensure the Regulator is made aware, as soon as practicable.</li> </ul> </li> </ul>					
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	Emergency Plan	
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	IMS Manual	
5 Are there written procedures for handling, investigating, communicating and reporting environmental complaints?	Yes	1.0	1.0	IMS Manual	
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	IMS Manual	
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 ?	Yes	-2.0	-2.0		06/06/2011



## 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	IMS Manual	
<b>Emergency planning Total</b>			<b>12.0</b>	<b>9.0</b>		

### 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	<b>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.</b>				
1.1	Is your Environmental Management System EMAS registered? If yes select Y and go to question 4.		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	Certification due to be achieved within 18 months of the facility becoming operational
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.		12	0	
<b>Sub Total</b>			<b>Max 20</b>	<b>15.00</b>	
2	<b>If you do not operate an externally audited environmental management system then assess your system against the criteria below:</b>				
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? <b>You may score in this box for ISO 14001 and industry systems but not for EMAS as this is a requirement for EMAS.</b>		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		-2.0	0.0	
<b>Organisational Totals</b>			<b>20.0</b>	<b>15.00</b>	

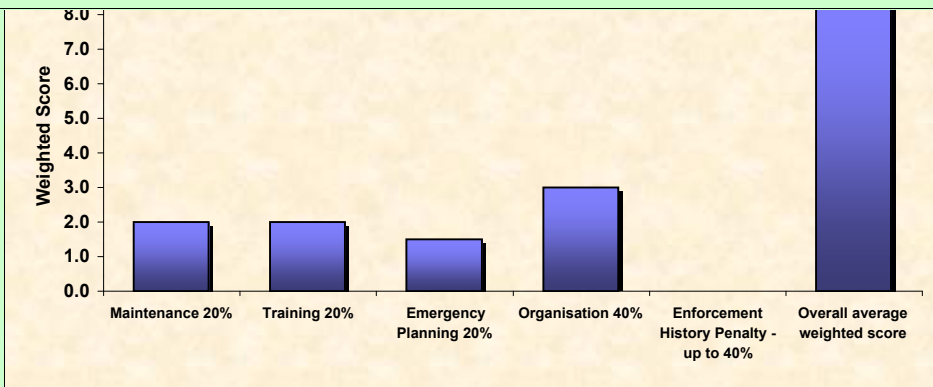
### Enforcement History (0 to -40% weighting)

				Notice etc	Date Issued	Date Spent
1	Enforcement , Improvement or Works 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 (in all cases, other than any overturned on appeal by the Operator)	0	None 0 1st - 5 2nd -10 3rd or more -40			
2	Formal cautions issued by the Environment Agency in respect offences under any legislation in the last 3 years.	0	None 0 1st - 5 2nd -10 3rd or more -40			
3	Prohibition, 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, (other than any overturned on appealed by the Operator) 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 (in last 10 years where a term of imprisonment was imposed on the Operator) (other than any overturned on appeal) [NB each individual offence counts separately].	0	None 0 1st - 15 2nd or more -40			

Enforcement History Total					If score is -40 please refer to Methodology page 24	
	Entered	Spent	Extant	Score		
1	Enforcement or Works Notices	0	0	0		0
2	Formal Cautions	0	0	0		
3	Prohibition, Suspension or Revocation Notices	0	0	0		
4	Convictions on Prosecutions	0	0	0		
<b>Enforcement History Total (min -40)</b>					<b>0</b>	

## 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 : MVV Environment Devonport Ltd

Permit: EPR/WP3833FT/A001

### 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	9.00	7.50	20.00	1.5
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
<b>Overall average weighted score</b>					<b>8.5</b>

## Opra Banded Profile

<b>Organisation Name:</b>	MVV Environment Devonport Ltd
<b>Case Number:</b>	EPR/WP3833FT/A001

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

Organisation Name: **MVV Environment Devonport Ltd** Case Number: **EPR/WP3833FT/A001**

**EPR Installations Application Charge Calculation**  
 (excludes Compliance Rating)  
**Scoring Summary - Financial**



Attribute	Band	Score	Total Score
<i>Complexity</i>	A	0	0
	B	0	15
	C	0	45
	D	0	82
	E	1	110
<i>Emissions to Air</i>	D		35
<i>Emissions to Water</i>	-		0
<i>Emissions to Land</i>	-		0
<i>Emissions to Sewer</i>	-		0
<i>Emissions to Off-site Waste</i>	B		2
<i>Emissions - Waste Input</i>	-		0
<i>Location</i>	D		40
<i>Operator Performance</i>	A		10
<b>Total Opra charging score</b>			<b>197.00</b>

**Indicative Fees & Charges**

<b>Application Fee</b>	£	<b>39,597.00</b>
<b>Subsistence Charge*</b>	£	<b>19,306.00</b>
<b>Substantial Variation</b>	£	<b>21,670.00</b>
<b>Standard Variation</b>	£	<b>11,032.00</b>
<b>Partial Surrender</b>	£	<b>18,912.00</b>
<b>Full Surrender</b>	£	<b>24,428.00</b>
<b>Closure</b>	£	<b>-</b>

**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.

<b>Opra Charge Multipliers</b>	
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

Category*	Events	Score per event	Total
1	0	60	0
2	0	31	0
3	0	4	0
4	0	0.1	0
		<b>Compliance Index</b>	<b>0</b>

**Compliance Rating Band**

A

**Compliance Rating Multiplier**

95%

\* Under Compliance Classification Scheme (CCS)

### Opra Score

Without Compliance Rating	197
Including Compliance Rating	187.15

<b>Subsistence Fee:</b>	<b>£ 18,340.70</b>
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