

Risk Assessment for Local Air Pollution Control

Name of permitted activity: DHL Exel Supply Chain "Inside Track" PG Note: PG6/34(11)

Discussed with: Mr Adam Norton LA Reference: B01/01

Inspector's Name: Dave Bass Date: 10/06/2014

Operator Performance Appraisal

| Component 1 - Compliance Assessment | | | | |
|--|-------------------|----|-----|----------------|
| Scale of Non-Compliance | Possible Scores | | | Scores Awarded |
| (A) Incident leading to justified complaint but no breach of specific permit condition or of general/residual BAT condition | 0 points | | | |
| (B) Incident leading to a justified complaint* | 5 per incident | | | |
| (C) Breach of permit not leading to formal action | 10 per incident | | | |
| (D) Incident leading to formal caution, Enforcement Notice or prosecution | 15 per incident | | | |
| (E) Incident leading to a Prohibition Notice | 20 per incident | | | |
| Total | (Max. 50) | | | 0 |
| * Unjustified complaints may be e.g. those considered by the inspector to be unreasonable or which cannot be clearly linked to an incident at the process. | | | | |
| Scoring for Component 2 - Assessment of Monitoring, Maintenance and Records | | | | |
| Criterion | Possible Scores | | | Scores Awarded |
| | Yes | No | N/A | |
| (A) Are emissions monitored as required in the permit? Are emissions and emissions monitoring recorded as required in the permit? | 0 | 40 | 0 | 0 |
| (B) Monitoring requirements reduced because results over time show consistent compliance? | 0 | 0 | 0 | 0 |
| (C) Is an appropriate maintenance schedule in place and available on request? | 0 | 5 | 0 | 0 |
| (D) Does the operator keep records of inspections, tests and monitoring in relation to the provisions of the permit and make them available to the regulator on request? | 0 | 5 | 0 | 0 |
| (E) Full documented records as required in permit available on-site? | 0 | 5 | 0 | 0 |
| (F) All relevant documents forwarded to the authority by date required? | -5 | 40 | 0 | 0 |
| Total score | (-5 to 35) | | | 0 |

| Component 3 - Assessment of Management, Training and Responsibility | | | | |
|---|-------------------------|----|-----|----------------|
| Criterion | Possible Scores | | | Scores Awarded |
| | Yes | No | N/A | |
| (A) Are procedures in place to ensure proper management, supervision and training for process operations, proper use of equipment and effective preventative maintenance on all plant and equipment concerned with the control of emissions to air? | 0 | 5 | 0 | 0 |
| (B) Specific responsibilities assigned to individual staff for these procedures? | 0 | 5 | 0 | 0 |
| (C) Does the operator maintain, and make available on request, a statement of training requirements for each operational post? | 0 | 5 | 0 | 0 |
| (D) Does the operator maintain a record of staff training and instruction and make it available to regulator on request? | 0 | 5 | 0 | 0 |
| (E) Trained staff on site throughout periods where potentially air-polluting activities take place? | 0 | 5 | 0 | 0 |
| (F) Is an 'appropriate' environmental management system in place? | -5 | 0 | 0 | -5 |
| Total | (-5 to 25) | | | -5 |
| Total Score for Operator Performance Appraisal | Range -10 to 110 | | | -5 |

| Overall scores | Score given |
|---|-------------|
| <i>Operator Performance Appraisal</i> | |
| Compliance Assessment | 0 |
| Assessment of Monitoring, Maintenance and Records | 0 |
| Assessment of Management, Training and Responsibility | -5 |
| Total score | -5 |

| | | |
|--|------------------|------------|
| OVERALL SCORE FOR THE PROCESS | Range -10 to 110 | -5 |
| REGULATORY EFFORT CATEGORY * high=score of >55, medium 30-55 and low <30 | LOW, MED, HIGH | LOW |

Comments

Solvent usage is currently under the 1 tonne threshold due to losing a major contract. Following discussion they will keep the permit as they still need to do all the permit requires to ensure the booths/staff are suitable and they are in discussion with other potential customers to bring in new contracts. Maintenance undertaken on the booths but due to less use filter changes are less frequent. No new staff have been taken on.

Paints Directive compliant: YES