

## Risk Assessment for Local Air Pollution Control

Name of permitted activity: St Ives Asphalt Plant PG Note: PG3/15

Discussed with: Alex Smiles LA Reference: B02/97

Inspector's Name: Claire Braybrook Date: 22/08/2019

### 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			
<b>Total</b>	<b>(Max. 50)</b>			<b>0</b>
Scoring for Component 2 - Assessment of Monitoring, Maintenance and Records				
Criterion	Possible Scores			Scores Awarded
	Yes	No	N/A	
(A) All monitoring undertaken to the degree required in the permit?	0	10	0	0
(B) Process operation modified where any problems indicated by monitoring?	0	5	0	0
(C) Fully documented and adhered to maintenance programme, in line with permit?	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) All relevant notifications forwarded to the authority by date required?	0	10	0	0
<b>Total score</b>	<b>(0 to 35)</b>			<b>0</b>

<b>Component 3 - Assessment of Management, Training and Responsibility</b>				
<b>Criterion</b>	<b>Possible Scores</b>			<b>Scores Awarded</b>
	<b>Yes</b>	<b>No</b>	<b>N/A</b>	
(A) Documented procedures in place for implementing all aspects of the permit?	<b>0</b>	5	0	<b>0</b>
(B) Specific responsibilities assigned to individual staff for these procedures?	<b>0</b>	5	0	<b>0</b>
(C) Completion of individual responsibilities checked and recorded by the company?	<b>0</b>	5	0	<b>0</b>
(D) Documented training records for all staff with air pollution control responsibilities?	<b>0</b>	5	0	<b>0</b>
(E) Trained staff on site throughout periods where potentially air-polluting activities take place?	<b>0</b>	5	0	<b>0</b>
(F) Is an 'appropriate' environmental management system in place?	<b>-5</b>	5	0	<b>-5</b>
<b>Total</b>	<b>(-5 to 30)</b>			<b>-5</b>
<b>Total Score for Operator Performance Appraisal</b>	<b>Range -5 to 115 (130)</b>			<b>-5</b>

<b>Overall scores</b>	<b>Score given</b>
<i>Operator Performance Appraisal</i>	
Component 1: Compliance Assessment	<b>0</b>
Component 2: Assessment of Monitoring, Maintenance and Records	<b>0</b>
Component 3: Assessment of Management, Training and Responsibility	<b>-5</b>
Total score	<b>-5</b>

<b>OVERALL SCORE FOR THE PROCESS</b>	Range -10 to 175 (200)	<b>-5</b>
<b>REGULATORY EFFORT CATEGORY</b> * high=score of >80, medium 40-80 and low <40	LOW, MED, HIGH	<b>LOW</b>

## Comments

Deliveries limited to a rate of 1 bar. Overfilling level sensors serviced every 3 months. Silo Services service the silos on a 6 monthly basis, completed on 27<sup>th</sup> June 2019. Fine dust is collected within the plant & used as filler, to reduce amount imported. PAK test completed on plainings received to check for tar, if present product is rejected (usually just receive plant waste and returned un-used material, which is stored for approx. 6 months, crushed and re-used). Company looking to move from Zeta to PCME for continuous monitoring system as Zeta will be unsupported shortly. Company also investigating a 'fogging system' to reduce dust & heat – planning for installation this year. This uses a misting system and is being installed to reduce the impact of Respirable Crystalline Silica (RCS) due to HSE drive. Properly fitted facemasks must be worn when entering the plant or going on to the top of the silos. Photos of PR valves seen (location & date correspond). Site inspection checklist seen. Dye testing completed on bag filters to check integrity. Bags usually last 3 years and should be changed in April. Emission test due to take place imminently. Maintenance programme and all paperwork seen. No issues noted during inspection. Company has ISO 14001.