

## Risk Assessment for Local Air Pollution Control

Name of permitted activity: Sundown Straw Products PG Note: PG6/26(11)

Discussed with: Andy LA Reference: B03/94

Inspector's Name: Dave, Natalie and Darren Date: 15/01/2016

### Environmental Impact Appraisal

Component 1 - Inherent Environmental Impact Potential			
APRR Risk Rating Category	Possible Scores	Score Awarded	
(A) Category 1	40		
(B) Category 2	20	20	
(C) Category 3	30		
Component 2 - Progress with Upgrading			
Status of Upgrading	Possible Scores	Score Awarded	
(A) Upgrading not complete but PG Note deadline has yet to be reached	5		
(B) Upgrading not yet complete and PG Note deadline has passed	40		
(C) Upgrading complete and meets BAT Requirements	0	0	
(D) Emissions control exceeds BAT Requirements	-40		
Component 3 - Sensitivity and Proximity of Receptors			
	Sensitivity of Receptors		
Proximity to Emission Source	High	Medium	Low
(A) < 100m*	20	12	5
(B) 100 - 250m*	42	40	3
(C) 250 - 500m*	5	3	4
(D) >500m*	0	0	0
<p>* All distances should be multiplied by a factor of 2 for mineral and cement &amp; lime processes and by a factor of 4 for combustion, incineration (not cremation), iron &amp; steel and non-ferrous metal processes.            Note: Distances should be measured from the process itself, rather than the site boundary.</p>			
Component 4 - Other Targets			
	Possible Scores	Score Awarded	
(A) Other air pollution problems in the local area to which process is a potential contributor	40		
(B) No such air pollution problems	0	0	
<b>Total Score for Environmental Impact Appraisal</b>	<b>Range 0 to 70</b>	<b>32</b>	

## Operator Performance Appraisal

Component 5 - 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			0
(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>			
* 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.				
Where facility has been on Reduced Charge due to Mothballing or Reduced Operating Levels				
(f) Failure to notify the regulator or restart or increase in level of operation to above the threshold requiring a permit at the installation in accordance with the acceptance letter	25			
<b>Total (applies only when condition F has been breached)</b>	<b>(Max 75)</b>			
Scoring for Component 6 - 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) Monitoring requirements reduced because results over time show consistent compliance?	5	0	0	0
(C) Process operation modified where any problems indicated by monitoring?	0	5	0	0
(D) Fully documented and adhered to maintenance programme, in line with permit?	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?	0	5	0	0
<b>Total score</b>	<b>(-5 to 30)</b>			<b>0</b>
Component 7 - Assessment of Management, Training and Responsibility				
Criterion	Possible Scores			Scores Awarded
	Yes	No	N/A	
(A) Documented procedures in place for implementing all aspects of the permit?	0	5	0	0
(B) Specific responsibilities assigned to individual staff for these procedures?	0	5	0	0
(C) Completion of individual responsibilities checked and recorded by the company?	0	5	0	0
(D) Documented training records for all staff with air pollution control responsibilities?	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	0
<b>Total</b>	<b>(-5 to 25)</b>			<b>0</b>
<b>Total Score for Operator Performance Appraisal</b>	<b>Range -10 to 105 (130)</b>			<b>0</b>

Overall scores	Score given
<i>Environmental Impact Appraisal</i>	
Inherent Environmental Impact Potential	20
Progress with Upgrading	0
Sensitivity and Proximity of Receptors	12
Other Targets	0
<i>Operator Performance Appraisal</i>	
Compliance Assessment	0
Assessment of Monitoring, Maintenance and Records	0
Assessment of Management, Training and Responsibility	0
Total score	32

OVERALL SCORE FOR THE PROCESS	Range -10 to 175 (200)	32
REGULATORY EFFORT CATEGORY * high=score of >80, medium 40-80 and low <40	LOW, MED, HIGH	LOW

## Comments

The site had a major fire but the was caused by a stray ember from the adjacent factory (also under their control) so not a breach related to this permit. The fire severely damaged the straw storage shed and also caused damage to the main process/engineering buildings. Following the fire the operator has instigated various actions to prevent it happening again e.g. improving spark detection and building concrete walls. This part of the site has a constant problem with straw debris on the floor. The 2015-16 emission test has not been undertaken yet. Operator has been updating their Standard Operating Procedures.

## DRY CLEANERS

### 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>			
* 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 loads weighed & weights recorded for all loads? Does the operator maintain a weekly inventory of solvent usage, product cleaned, and solvent waste sent for recovery or disposal?	0	10	0	
(B) Monitoring requirements reduced because results over time show consistent compliance?	0	0	0	
(C) Process operation modified where any problems indicated by monitoring?	0	5	0	
(D) Fully documented and adhered to maintenance programme, in line with permit?	0	5	0	
(E) Full documented records as required in permit available on-site?	0	5	0	
(F) All relevant documents forwarded to the authority by date required?	-5	10	0	
<b>Total score</b>	<b>(-5 to 35)</b>			
Component 3 - Assessment of Management, Training and Responsibility				
Criterion	Possible Scores			Scores Awarded
	Yes	No	N/A	
(A) Are all operating staff aware of where the operating manual for each dry cleaning machine can be found and do they have ready access to it?	0	5	0	
(B) Are nominated trained members of staff exclusively permitted to operate the machines?	0	5	0	
(C) Are all operating staff trained in the operation of each dry cleaning machine and the control and use of dry cleaning solvents?	0	5	0	
(D) Are records kept of training received by operating staff?	0	5	0	
(E) Are suitably trained or experienced staff on site while machines are operating?	0	5	0	
(F) Is an 'appropriate' environmental management system in place?	-5	0	0	
<b>Total</b>	<b>(-5 to 25)</b>			
<b>Total Score for Operator Performance Appraisal</b>	<b>Range -10 to 110</b>			



Total (applies only when condition F has been breached)		(Max 75)		
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	10	0	
(B) Monitoring requirements reduced because results over time show consistent compliance?	0	0	0	
(C) Is an appropriate maintenance schedule in place and available on request?	0	5	0	
(D) Fully documented and adhered to maintenance programme, in line with permit?	0	5	0	
(E) Full documented records as required in permit available on-site?	0	5	0	
(F) Has the operator notified the regulator promptly of all relocations of all plant?	-5	10	0	
Total score	(-5 to 35)			
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	
(B) Specific responsibilities assigned to individual staff for these procedures?	0	5	0	
(C) Does the operator maintain, and make available on request, a statement of training requirements for each operational post?	0	5	0	
(D) Are all staff with responsibility for operating the process sufficiently trained to be aware of their responsibilities under the permit, minimising emissions on start up and shut down and taking action to minimise emissions during abnormal conditions?	0	5	0	
(E) Trained staff on site throughout periods where potentially air-polluting activities take place?	0	5	0	
(F) Is an 'appropriate' environmental management system in place?	-5	0	0	
Total	(-5 to 25)			
Total Score for Operator Performance Appraisal		Range -10 to 110 (135)		

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

<b>OVERALL SCORE FOR THE PROCESS</b>	Range -10 to 110 (135)	
<b>REGULATORY EFFORT CATEGORY</b>		
* high=score of >55, medium 30-55 and low <30	LOW, MED, HIGH	

## Comments

## Petrol Stations

### 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>			
* 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	10	0	
(B) Monitoring requirements reduced because results over time show consistent compliance?	0	0	0	
(C) Has a written maintenance programme been provided to the regulator with respect to pollution control equipment?	0	5	0	
(D) Is there a log book at the authorised premises incorporating details of all maintenance, examination and testing, inventory checking, installation and repair work carried out?	0	5	0	
(E) Full documented records as required in permit available on-site?	0	5	0	
(F) All relevant documents forwarded to the authority by date required?	-5	10	0	
<b>Total score</b>	<b>(-5 to 35)</b>			

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	
(B) Are all staff with responsibility for operating the installation trained to be aware of their responsibilities under the permit?	0	5	0	
(C) Does the operator maintain, and make available on request, a statement of training requirements for each operational post?	0	5	0	
(D) Does the operator keep, and make available, a record of the training received by each person whose actions may have an impact on the environment?	0	5	0	
(E) Is there a competent trained person who remains near the tanker during unloading? (Delivery drivers may be trained as the competent person)	0	5	0	
(F) Is an 'appropriate' environmental management system in place?	-5	0	0	
<b>Total</b>	<b>(-5 to 25)</b>			
<b>Total Score for Operator Performance Appraisal</b>	<b>Range -10 to 110</b>			

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

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

### Comments

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## Waste Oil Burners

### 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>			
* 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	10	0	
(B) Monitoring requirements reduced because results over time show consistent compliance?	0	0	0	
(C) Does the operator have records showing that each appliance has been serviced regularly in accordance with manufacturer's instructions?	0	5	0	
(D) Are there records of servicing for a minimum of two years prior to inspection?	0	5	0	
(E) Full documented records as required in permit available on-site?	0	5	0	
(F) All relevant documents forwarded to the authority by date required?	-5	10	0	
<b>Total score</b>	<b>(-5 to 35)</b>			

Component 3 - Assessment of Management, Training and Responsibility				
Criterion	Possible Scores			Scores Awarded
	Yes	No	N/A	
(A) Are clear instructions available at all times on or near the appliance detailing the correct operation and maintenance of the equipment?	0	5	0	
(B) Are nominated members of staff exclusively permitted to operate the appliance?	0	5	0	
(C) Is the list of staff permitted to operate the appliance available?	0	5	0	
(D) Are all nominated SWOB operating staff trained in, and conversant with, its operation? (Staff operating vapourising burners should be particularly conversant with the correct procedure for lighting from cold)	0	5	0	
(E) Are staff nominated to operate the alliance on site while the appliance is in use?	0	5	0	
(F) Is an 'appropriate' environmental management system in place?	-5	0	0	
<b>Total</b>	<b>(-5 to 25)</b>			
<b>Total Score for Operator Performance Appraisal</b>		<b>Range -10 to 110</b>		

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

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

### Comments

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## Vehicle Re-sprayer

### 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>			
* 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	10	0	
(B) Monitoring requirements reduced because results over time show consistent compliance?	0	0	0	
(C) Is an appropriate maintenance schedule in place and available on request?	0	5	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	
(E) Full documented records as required in permit available on-site?	0	5	0	
(F) All relevant documents forwarded to the authority by date required?	-5	10	0	
<b>Total score</b>	<b>(-5 to 35)</b>			
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	
(B) Specific responsibilities assigned to individual staff for these procedures?	0	5	0	
(C) Does the operator maintain, and make available on request, a statement of training requirements for each operational post?	0	5	0	
(D) Does the operator maintain a record of staff training and instruction and make it available to regulator on request?	0	5	0	
(E) Trained staff on site throughout periods where potentially air-polluting activities take place?	0	5	0	
(F) Is an 'appropriate' environmental management system in place?	-5	0	0	
<b>Total</b>	<b>(-5 to 25)</b>			
<b>Total Score for Operator Performance Appraisal</b>	<b>Range -10 to 110</b>			

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

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

### Comments

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### Paints Directive compliant:

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## Cement Batching

### Operator Performance Appraisal

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)			
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	
(B) Process operation modified where any problems indicated by monitoring?	0	5	0	
(C) Fully documented and adhered to maintenance programme, in line with permit?	0	5	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	
(E) All relevant notifications forwarded to the authority by date required?	0	10	0	
Total score	(0 to 35)			
Component 3 - Assessment of Management, Training and Responsibility				
Criterion	Possible Scores			Scores Awarded
	Yes	No	N/A	
(A) Documented procedures in place for implementing all aspects of the permit?	0	5	0	
(B) Specific responsibilities assigned to individual staff for these procedures?	0	5	0	
(C) Completion of individual responsibilities checked and recorded by the company?	0	5	0	
(D) Documented training records for all staff with air pollution control responsibilities?	0	5	0	
(E) Trained staff on site throughout periods where potentially air-polluting activities take place?	0	5	0	
(F) Is an 'appropriate' environmental management system in place?	-5	5	0	
Total	(-5 to 30)			
Total Score for Operator Performance Appraisal		Range -5 to 115 (130)		

