

Risk Assessment for Local Air Pollution Control

Name of permitted activity: TW Garment Care PG Note: PG6/46

Discussed with: Pippa Granger LA Reference: B06/09

Inspector's Name: Claire Braybrook Date: 14/05/2019

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 | | | |
| 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 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 | 40 | 0 | 0 |
| (B) Monitoring requirements reduced because results over time show consistent compliance? | 0 | 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? | -5 | 10 | 0 | 10 |
| Total score | (-5 to 35) | | | 10 |

| 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 | 0 |
| (B) Are nominated trained members of staff exclusively permitted to operate the machines? | 0 | 5 | 0 | 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 | 0 |
| (D) Are records kept of training received by operating staff? | 0 | 5 | 0 | 0 |
| (E) Are suitably trained or experienced staff on site while machines are operating? | 0 | 5 | 0 | 0 |
| (F) Is an 'appropriate' environmental management system in place? | -5 | 0 | 0 | 0 |
| Total | (-5 to 25) | | | 0 |
| Total Score for Operator Performance Appraisal | Range -10 to 110 | | 10 | |

| Overall scores | Score given |
|---|--------------------|
| <i>Operator Performance Appraisal</i> | |
| Compliance Assessment | 0 |
| Assessment of Monitoring, Maintenance and Records | 10 |
| Assessment of Management, Training and Responsibility | 0 |
| Total score | 10 |

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

Comments

Annual service contract with installer, Dane Realstar, who is also available at short notice if any issues arise. Last service completed on 28th January 2019. No solvents stored on site – Perc is ordered when required and emptied straight into the machine. 'Waste Care' collect the waste as and when required. Machine not in operation – no odour detected. All records seen, including training records. No change in staff or machine. Only Pippa operates the machine. Scales checked monthly. Annual solvent usage records provided and indicate compliance – discussed the requirement for data to be submitted annually (in line with condition 3). Permit due to be reviewed.