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## **Risk Assessment for Local Air Pollution Control**

Name of permitted activity:	VIP Polymers Ltd	PG No	te: PG6	/28
Discussed with:	Mr Nick Lucken	_LA Reference	:e: <u>B11</u>	/94
Inspector's Name:	Dave Bass	Da	Date: 24/09/2013	
Environmental Impact Ap	praisal			
Component 1 - Inherent Environ	mental Impact Potential			
APRR Risk Rating Category		Possible S	cores	Score Awarded
(A) Category 1		10		
(B) Category 2		<del>20</del>		
(C) Category 3		30		30
Component 2 - Progress with Up	ograding			
Status of Upgrading		Possible S	cores	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		10		
(C) Upgrading complete and meets BAT Requirements		0		0
(D) Emissions control exceeds BAT Requirements		-10		
Component 3 - Sensitivity and P	roximity of Receptors			
		Sensit	Sensitivity of Receptors	
Proximity to Emission Source		High	Medium	Low
(A) < 100m <sup>*</sup>		<del>20</del>	12	5
(B) 100 - 250m <sup>*</sup>		<del>12</del>	<del>10</del>	3
(C) 250 - 500m <sup>*</sup>		5	3	4

<sup>\*</sup> All distances should be multiplied by a factor of 2 for mineral and cement & lime processes and by a factor of 4 for combustion, incineration (not cremation), iron & steel and non-ferrous metal processes. Note: Distances should be measured from the process itself, rather than the site boundary.

(D) >500m\*

Component 4 - Other Targets		
	Possible Scores	Score Awarded
(A) Other air pollution problems in the local area to which process is a potential contributor	<del>10</del>	
(B) No such air pollution problems	0	0
Total Score for Environmental Impact Appraisal	Range 0 to 70	42

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## Operator Performance Appraisal

Scale of Non-Compliance   Possible Scores   Awarded     (A) Incident leading to justified complaint but no breach of specific permit condition or of general/residual BAT condition   0 points	Component 5 - Compliance Assessment				
condition or of general/residual BAT conditionD putties(B) Incident leading to a justified complaint5 per incident(C) Breach of permit not leading to formal action10 per incident(D) Incident leading to formal caution, Enforcement Notice or prosecution15 per incident(C) Breach of permit not leading to formal action, Enforcement Notice or prosecution15 per incident(E) Incident leading to a Prohibition Notice20 per incident(Max. 50)0(Total(Max. 50)00(I) 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.25Where facility has been on Reduced Charge due to Mothballing or Reduced Operating Levels1(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 letter25Criterion(Max 75)Scorring 	Scale of Non-Compliance	Possible Scores		es	Scores Awarded
(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. Vmere 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   Total (applies only when condition F has been breached) (Max 75) Scoring for Component 6 - Assessment of Monitoring, Maintenance and Records   Criterion Possible Scores \$cord (Max 75) \$cord (Max 75)   (A) All monitoring undertaken to the degree required in the permit? 0 10 0   (B) Monitoring requirements reduced because results over time show consistent compliance? -5 0 0   (C) Process operation modified where any problems indicated by monitoring? 0 5 0 0   (B) Monitoring requirements forwarded to maintenance programme, in line with permit? 0 5 0 0   (C) Flu		0 points			
(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. Velocity the condition of 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   Scoring for Component 6 - Assessment of Monitoring, Maintenance and Records Vers No N/A   (A) All monitoring requirements reduced because results over time show consistent compliance? 0 40 0   (D) Fully documented and adhered to maintenance programme, in line with permit? 5 0 0   (F) Full documented records as required in permit available on-site? 5 0 0   (F) Full documented procedures in place for implementing all aspects of the permit? 5 0 0 5 0 0   (A) Documented procedures in place for implementing all aspects of the permit? 0 5 0 0 5 0 0   (D) Full documented procedures in place for implementing all aspects of the permit? 0 5 0 0	(B) Incident leading to a justified complaint	5 per incident		:	
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		0	5	θ	0
(F) Is an 'appropriate' environmental management system in place? -5 $\theta$ $\theta$ -5	(F) Is an 'appropriate' environmental management system in place?	-5	θ	θ	-5
Total (-5 to 25) -5	Total	(-5 to 25) -5		-5	
Total Score for Operator Performance Appraisal Range -10 to 105 -10	Total Score for Operator Performance Appraisal	Range -10 to 105 (130) -10			

Overall scores	Score given
Environmental Impact Appraisal	
Inherent Environmental Impact Potential	30
Progress with Upgrading	0
Sensitivity and Proximity of Receptors	12
Other Targets	0
Operator Performance Appraisal	
Compliance Assessment	0
Assessment of Monitoring, Maintenance and Records	-5
Assessment of Management, Training and Responsibility	-5
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

Emission testing was being undertaken at time of inspection. Productivity has increased recently

and some new (second-hand) machines have been installed to replace older plant. There has

been an increase in plant breakdowns due to previously dormant plant coming back online,

however, maintenance still undertaken and recorded by dedicated employees. Training on

procedures undertaken and appropriate records kept. Operator has a local environmental

management system which is actively investigating different options.