

Risk Assessment for Local Air Pollution Control

Name of permitted activity: Shell St Ives PG Note: PG1/14
 Discussed with: Mr Faiz LA Reference: P20/98
 Inspector's Name: Dave Bass Date: 02/03/2009

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) Has a written maintenance programme been provided to the regulator with respect to pollution control equipment?	0	5	0	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	5
(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)			5

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	5
(B) Are all staff with responsibility for operating the installation trained to be aware of their responsibilities under the permit?	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 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	5
(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	0
(F) Is an 'appropriate' environmental management system in place?	-5	0	0	0
Total	(-5 to 25)			10
Total Score for Operator Performance Appraisal	Range -10 to 110			15

Overall scores	Score given
<i>Operator Performance Appraisal</i>	
Compliance Assessment	0
Assessment of Monitoring, Maintenance and Records	5
Assessment of Management, Training and Responsibility	10
Total score	15

OVERALL SCORE FOR THE PROECSS	Range -10 to 110	15
REGULATORY EFFORT CATEGORY * high=score of >55, medium 30-55 and low <30	LOW, MED, HIGH	LOW

Comments

Log book completely unsatisfactory and the staff on site did not know where it was. The in the log information is in the wrong order, often out of date or not put in the log book at all. It appears the last information to be placed book was 2004. Procedures are on site but as staff unaware of the log book they appear not to have been distributed. Only training records found is the competent persons but no evidence of any other training.