

Risk Assessment for Local Air Pollution Control

Name of permitted activity: East Anglian Galvanizing Ltd **SG Note:** SG5
Discussed with: Mr Mark Hammond **LA Reference:** A09/09
Inspector's Name: Claire Braybrook **Date:** 22nd July 2020

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	0				
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*	12	10	3		
(C) 250 - 500m*	5	3	1		
(D) >500m*	0	0	0		
<small>* 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.</small>					
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			
Total Score for Environmental Impact Appraisal		Range 0 to 70	25		

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			
(B) Incident leading to a justified complaint*	10 per incident			
(C) Breach of permit not leading to formal action	10 per incident			10
(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. 55)			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.				
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			
Total (applies only when condition F has been breached)	(Max 80)			
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	40	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	40	0	0
(D) Fully documented and adhered to maintenance programme, in line with permit?	0	40	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	40	0	0
Total score	(-5 to 45)			0
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	-5
Total	(-5 to 25)			-5
Total Score for Operator Performance Appraisal	Range -10 to 1205 (150)			5

Overall scores	Score given
<i>Environmental Impact Appraisal</i>	
Inherent Environmental Impact Potential	20
Progress with Upgrading	0
Sensitivity and Proximity of Receptors	5
Other Targets	0
<i>Operator Performance Appraisal</i>	
Compliance Assessment	10
Assessment of Monitoring, Maintenance and Records	0
Assessment of Management, Training and Responsibility	-5
Total score	30

OVERALL SCORE FOR THE PROCESS	Range -10 to 175 (200)	30
REGULATORY EFFORT CATEGORY * high=score of >80, medium 40-80 and low <40	LOW, MED, HIGH	LOW

Comments

A fire occurred on the site on 24th August 2019, resulting in a release of contaminated water from the site into adjacent watercourses, and a subsequent warning letter from the Environment Agency (EA). In correspondence dated 17th September 2019 the EA set out a number of actions required in order to minimise the risk of pollution. These have now all been confirmed by the operator as completed, including:

- CCTV survey of underground storage and drainage – one pipe had dropped slightly and has now been resealed.
- Penstock valve has been installed replacing the bung to prevent discharges
- New additional curbing installed
- Improved access to the discharge point with steps and gate
- Ditch visually checked weekly
- Interceptors emptied/cleaned put on EMS and external company will be used annually.
- Soil sampling of ditches completed up and downstream to see if any further works are required – awaiting results at time of inspection (delay due to rainfall).
- Site emergency plan has been reviewed, amended and improved.

We also spoke about completing spot checks providing instant results prior to discharge into the ditch and you agreed this would be introduced (Zinc & pH papers). Please ensure you keep a record of this, as well as those you send off to the lab.

Annual emissions monitoring has not been completed due to the fire on 24th August 2019 and COVID lockdown. The process was not operational for several months following the fire and began at a reduced capacity on 14th January 2020. Full capacity should resume at the end of August this year. This resulted in emissions monitoring being delayed and no results obtained for 2019/20. Taking into account the reasons and lack of operational activity this aspect has not been penalised in the above risk assessment. Sampling is due in September and results will be sent through following receipt.

The final new crane is due to be installed on Friday 24th July and the acid storage facilities and rainwater harvest tank are due to be installed from 10th August, so all works should be completed by the end of August and the plant should be operating normally.

Whilst there have been changes to procedures on site following the fire, the process itself remains the same. The cladding to the roof has been upgraded and is now fire resistant.

All audits required under condition 16 were viewed on site. Materials usage and energy consumption both for 19/20 and waste minimisation and water efficiency 18/19.

Condition 34, Paul is to send in records of the annual maintenance of the interceptors – received 3rd September 2020.

The incident with the fire demonstrated non-compliance with condition 36 regarding site containment and therefore the risk assessment has been marked to demonstrate a breach of the Permit. Since the incident, action has been taken by the operator to rectify the situation and this has been demonstrated within photos received from the site. This will be inspected during the next onsite inspection when Covid restrictions allow.

The maintenance of the interceptors and site containment bunding etc is now on the EMS system.

Photos of the site taken on 21/07/2020 viewed during meeting and received via email the following day indicate a clean and tidy site.

Permit review is required but new BREF note is still due to be issued so will await that before completing the review.
