

## Risk Assessment for Local Air Pollution Control

Name of permitted activity: Eaton Tractors Ltd PG Note: PG3/16

Discussed with: Mr Russell Saywell LA Reference: B13/93

Inspector's Name: Aaron Morley Date: 07/10/2010

### 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>  |    |     | <b>0</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 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?<br>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) Is an appropriate maintenance schedule in place and available on request?   | 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) Has the operator notified the regulator promptly of all relocations of all plant?   | -5                | 40 | 0   | 0              |
| <b>Total score</b>  | <b>(-5 to 35)</b> |    |     | <b>0</b>       |

| <b>Component 3 - Assessment of Management, Training and Responsibility</b>  |                               |           |            |                       |
|---|-------------------------------|-----------|------------|-----------------------|
| <b>Criterion</b>  | <b>Possible Scores</b>        |           |            | <b>Scores Awarded</b> |
|   | <b>Yes</b>                    | <b>No</b> | <b>N/A</b> |                       |
| (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          | 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          | 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          | 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 110 (135)</b> |           |            | <b>0</b>              |

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

|   |                        |     |
|---|------------------------|-----|
| <b>OVERALL SCORE FOR THE PROCESS</b>          | Range -10 to 110 (135) | 0   |
| <b>REGULATORY EFFORT CATEGORY</b>             |                        |     |
| * high=score of >55, medium 30-55 and low <30 | LOW, MED, HIGH         | LOW |

### Comments

Mobile crusher was located on the eastern boundary of the site and was not operating. There was a large stockpile of crushed material to the side of it. The whole site was very wet so there was not a problem with fugitive dust emissions. Mr Saywell showed me the log book entries which showed that the crusher was operating during February, May, November 2009 and January 2010. No dust was observed during any of these times by the operator.