

## Risk Assessment for Local Air Pollution Control

Name of permitted activity: Darex UK Ltd PG Note: PG6/28 & PG6/44

Discussed with: Mr Glenn Draper LA Reference: B19/93

Inspector's Name: Dave Bass Date: 11/10/2012

### Environmental Impact Appraisal

| Component 1 - Inherent Environmental Impact Potential   |                          |               |     |
|---|--------------------------|---------------|-----|
| APRR Risk Rating Category   | Possible Scores          | Score Awarded |     |
| (A) Category 1  | 10                       |               |     |
| (B) Category 2  | 20                       |               |     |
| (C) Category 3  | 30                       | 30            |     |
| 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  | 10                       |               |     |
| (C) Upgrading complete and meets BAT Requirements   | 0                        | 0             |     |
| (D) Emissions control exceeds BAT Requirements  | -10                      |               |     |
| 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   |
| <p>* All distances should be multiplied by a factor of 2 for mineral and cement &amp; lime processes and by a factor of 4 for combustion, incineration (not cremation), iron &amp; steel and non-ferrous metal processes.<br/> Note: Distances should be measured from the process itself, rather than the site boundary.</p> |                          |               |     |
| Component 4 - Other Targets   |                          |               |     |
|   | Possible Scores          | Score Awarded |     |
| (A) Other air pollution problems in the local area to which process is a potential contributor  | 10                       |               |     |
| (B) No such air pollution problems  | 0                        | 0             |     |
| <b>Total Score for Environmental Impact Appraisal</b>   | <b>Range 0 to 70</b>     | <b>50</b>     |     |

## 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*  | 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 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                             | 10 | 0   | 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                             | 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?   | 0                             | 5  | 0   | 0              |
| <b>Total score</b>  | <b>(-5 to 30)</b>             |    |     | <b>0</b>       |
| 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             |
| <b>Total</b>  | <b>(-5 to 25)</b>             |    |     | <b>-5</b>      |
| <b>Total Score for Operator Performance Appraisal</b>   | <b>Range -10 to 105 (130)</b> |    |     | <b>-5</b>      |

| Overall scores  | Score given |
|---|-------------|
| <i>Environmental Impact Appraisal</i>                 |             |
| Inherent Environmental Impact Potential               | 30          |
| Progress with Upgrading                               | 0           |
| Sensitivity and Proximity of Receptors                | 20          |
| Other Targets   | 0           |
| <i>Operator Performance Appraisal</i>                 |             |
| Compliance Assessment                                 | 0           |
| Assessment of Monitoring, Maintenance and Records     | 0           |
| Assessment of Management, Training and Responsibility | -5          |
| Total score   | 45          |

|   |                        |     |
|---|------------------------|-----|
| OVERALL SCORE FOR THE PROCESS   | Range -10 to 175 (200) | 45  |
| REGULATORY EFFORT CATEGORY<br>* high=score of >80, medium 40-80 and low <40 | LOW, MED, HIGH         | LOW |

## Comments

Emissions testing planned for that week. Full maintenance schedule for all plant available and company have employed a new maintenance operative (Steve). Operating procedures in place for all aspects of production and staff are trained in these and records kept. Company has ISO14001 but considering changing to a different system. A new dust monitor has been installed in the Banbury line and waiting for PCME to calibrate the system. A new mixing vessel has been installed which has decreased both operating (mixing) time and energy usage.