

Risk Assessment for Local Air Pollution Control

Name of permitted activity: Derek Gladwin Ltd PG Note: PG6/34

Discussed with: Paul Ostojic/ Kevin Ashton LA Reference: B24/93

Inspector's Name: Dave Bass Date: 08/09/2010

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			
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) Is an appropriate maintenance schedule in place and available on request?	0	5	0	0
(D) Does the operator keep records of inspections, tests and monitoring in relation to the provisions of the permit and make them available to the regulator on request?	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?	-5	40	0	0
Total score	(-5 to 35)			0

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	0
(B) Specific responsibilities assigned to individual staff for these procedures?	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 maintain a record of staff training and instruction and make it available to regulator on request?	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 110			-5

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

OVERALL SCORE FOR THE PROCESS	Range -10 to 110	-5
REGULATORY EFFORT CATEGORY		
* high=score of >55, medium 30-55 and low <30	LOW, MED, HIGH	LOW

Comments

Site still has ISO 9001 & PAS 125 accreditation and undertakes regular audits from RBS so all documents and procedures kept and up to date. Site has EMS system in place. Annual maintenance from spraybooths undertaken by external company and staff change floor filters approximately every 3 weeks. Overall site is very well run with staff aware of their responsibilities.