

## Risk Assessment for Local Air Pollution Control

Name of permitted activity: Johnsons Cleaners PG Note: PG6/46

Discussed with: Mrs Jane Baldwin LA Reference: B07/07

Inspector's Name: Dave Bass Date: 03/11/2009

### 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	<b>10 per incident</b>			<b>10</b>
(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>10</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.				
Scoring for Component 2 - Assessment of Monitoring, Maintenance and Records				
Criterion	Possible Scores			Scores Awarded
	Yes	No	N/A	
(A) Are loads weighed & weights recorded for all loads? Does the operator maintain a weekly inventory of solvent usage, product cleaned, and solvent waste sent for recovery or disposal?	<b>0</b>	40	0	<b>0</b>
(B) Monitoring requirements reduced because results over time show consistent compliance?	0	0	<b>0</b>	<b>0</b>
(C) Process operation modified where any problems indicated by monitoring?	0	5	<b>0</b>	<b>0</b>
(D) Fully documented and adhered to maintenance programme, in line with permit?	<b>0</b>	5	0	<b>5</b>
(E) Full documented records as required in permit available on-site?	<b>0</b>	5	0	<b>0</b>
(F) All relevant documents forwarded to the authority by date required?	<b>-5</b>	40	0	<b>-5</b>
<b>Total score</b>	<b>(-5 to 35)</b>			<b>0</b>

Component 3 - Assessment of Management, Training and Responsibility				
Criterion	Possible Scores			Scores Awarded
	Yes	No	N/A	
(A) Are all operating staff aware of where the operating manual for each dry cleaning machine can be found and do they have ready access to it?	0	5	0	0
(B) Are nominated trained members of staff exclusively permitted to operate the machines?	0	5	0	0
(C) Are all operating staff trained in the operation of each dry cleaning machine and the control and use of dry cleaning solvents?	0	5	0	0
(D) Are records kept of training received by operating staff?	0	5	0	0
(E) Are suitably trained or experienced staff on site while machines are operating?	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 110</b>			<b>0</b>

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

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

### Comments

The annual VOC submission shows none compliance with emission limits set out in permit. Site considers that this may be due to lack of maintenance as engineer is off sick and cover has not undertaken maintenance. Agreed that the VOC usage will be reassessed once maintenance has been undertaken to determine if this is the case. All other records kept on site and staff daily maintenance undertaken. No solvents kept on site as they order what is required, empty solvent containers are crushed, placed in plastic bags and disposed of in general waste.