

## Risk Assessment for Local Air Pollution Control

Name of permitted activity: VEB 10000 01-01-13TM-02 PG Note: PG3/15a & PG3/16

Discussed with: Dr Ian Holton LA Reference: B05/13

Inspector's Name: Dave Bass Date: 09/09/2013

### 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? Are emissions and emissions monitoring recorded as required in the permit?	0	10	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	5
(E) Full documented records as required in permit available on-site?	0	5	0	5
(F) Has the operator notified the regulator promptly of all relocations of all plant?	5	10	0	10
<b>Total score</b>	<b>(-5 to 35)</b>			<b>20</b>

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	5
(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	5
(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	-5
Total	(-5 to 25)			5
Total Score for Operator Performance Appraisal		Range -10 to 110 (135)		25
Overall scores				Score given
Operator Performance Appraisal				
Compliance Assessment				0
Assessment of Monitoring, Maintenance and Records				20
Assessment of Management, Training and Responsibility				5
Total score				25
OVERALL SCORE FOR THE PROCESS		Range -10 to 110 (135)		25
REGULATORY EFFORT CATEGORY				
* high=score of >55, medium 30-55 and low <30		LOW, MED, HIGH		LOW

### Comments

Emission test being undertaken at time of inspection. First test was destined to fail (according to testers) so plant tweaked and second test went ok with some excess fugitive emissions being released from front end of plant and few emissions being emitted from stack. Plant manufacturer on site making adjustments on plant but no formal maintenance schedule viewed but plant still being designed/modified so will expect maintenance schedule then. Notifications of plant movements and emission testing very poor and needs reviewing. No formal procedures or training developed, however, only one operator available for plant so training and procedures need developing before further operatives are allowed to use plant.