

Risk Assessment for Local Air Pollution Control

Name of permitted activity: Paxford Composites Ltd PG Note: PG6/23

Discussed with: _____ LA Reference: B01/02

Inspector's Name: Dave Bass Date: 18/04/2016

Environmental Impact Appraisal

| Component 1 - Inherent Environmental Impact Potential | | | |
|---|--------------------------|---------------|-----|
| APRR Risk Rating Category | Possible Scores | Score Awarded | |
| (A) Category 1 | 40 | | |
| (B) Category 2 | 20 | 20 | |
| (C) Category 3 | 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 | 40 | | |
| (C) Upgrading complete and meets BAT Requirements | 0 | 0 | |
| (D) Emissions control exceeds BAT Requirements | -40 | | |
| Component 3 - Sensitivity and Proximity of Receptors | | | |
| | Sensitivity of Receptors | | |
| Proximity to Emission Source | High | Medium | Low |
| (A) < 100m* | 20 | 42 | 5 |
| (B) 100 - 250m* | 12 | 40 | 3 |
| (C) 250 - 500m* | 5 | 3 | 4 |
| (D) >500m* | 0 | 0 | 0 |
| <p>* All distances should be multiplied by a factor of 2 for mineral and cement & lime processes and by a factor of 4 for combustion, incineration (not cremation), iron & steel and non-ferrous metal processes.</p> <p>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 | 40 | | |
| (B) No such air pollution problems | 0 | 0 | |
| Total Score for Environmental Impact Appraisal | Range 0 to 70 | 32 | |

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 | | | |
| Total | (Max. 50) | | | |
| * 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 | | | |
| Total (applies only when condition F has been breached) | (Max 75) | | | |
| 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 | 10 |
| (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 | 5 |
| Total score | (-5 to 30) | | | 15 |
| 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 |
| Total | (-5 to 25) | | | -5 |
| Total Score for Operator Performance Appraisal | Range -10 to 105 (130) | | | -5 |

| Overall scores | Score given |
|---|-------------|
| <i>Environmental Impact Appraisal</i> | |
| Inherent Environmental Impact Potential | 20 |
| Progress with Upgrading | 0 |
| Sensitivity and Proximity of Receptors | 12 |
| Other Targets | 0 |
| <i>Operator Performance Appraisal</i> | |
| Compliance Assessment | 15 |
| Assessment of Monitoring, Maintenance and Records | 0 |
| Assessment of Management, Training and Responsibility | -5 |
| Total score | |

| | | |
|---|------------------------|--------|
| OVERALL SCORE FOR THE PROCESS | Range -10 to 175 (200) | 42 |
| REGULATORY EFFORT CATEGORY * high=score of >80, medium 40-80 and low <40 | LOW, MED, HIGH | MEDIUM |

Comments

2015-16 emission test not undertaken/notified and total VOC consumption not notified. Breaching conditions 1, 4, 5, 6, 14 and 15.