

Risk Assessment for Local Air Pollution Control

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

Discussed with: Glenn Ford & Dennis McCauley LA Reference: B01/02

Inspector's Name: Claire Braybrook Date: 10/03/2020

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
<small>* 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. Note: Distances should be measured from the process itself, rather than the site boundary.</small>			
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*	10 per incident			
(C) Breach of permit not leading to formal action	10 per incident			20
(D) Incident leading to formal caution, Enforcement Notice or prosecution	15 per incident			15
(E) Incident leading to a Prohibition Notice	20 per incident			
Total	(Max. 55)			35
* 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 80)			
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	10	0	0
(D) Fully documented and adhered to maintenance programme, in line with permit?	0	10	0	10
(E) Full documented records as required in permit available on-site?	0	5	0	5
(F) All relevant documents forwarded to the authority by date required?	0	10	0	10
Total score	(-5 to 45)			35
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	5
(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	0
Total	(-5 to 25)			5
Total Score for Operator Performance Appraisal	Range -10 to 105 (150)			75

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	35
Assessment of Monitoring, Maintenance and Records	35
Assessment of Management, Training and Responsibility	5
Total score	107

OVERALL SCORE FOR THE PROCESS	Range -10 to 175 (200)	107
REGULATORY EFFORT CATEGORY		
* high=score of >80, medium 40-80 and low <40	LOW, MED, HIGH	High

Comments

A lot of work has taken place on site to clear the external storage area which is an improvement. 3rd Spray booth has not been used over last 12-18 months and there are currently no plans to use it again so there is no longer a requirement to vary condition 8 of the Permit to allow this activity.

Low level filters are changed 1-2 times per month – every time a topcoat is sprayed. Mr Ford confirmed that Exova would be able to complete monitoring in 4 – 6 weeks. 2018 & 2019 solvent usage figures seen on site – Mr Ford agreed to send a copy of these in via email. Spraybooth Technology Limited complete the annual servicing.

Condition 25 – filters are kept in sealed bags & removed by registered waste contractor Malary. Condition 29 – only use acetone for cleaning, the company have minimised use.

Mixer has been beneficial to reduce resin use, and this is now managed more effectively. Resin wastage has been reduced by 15-20% as it is now mixed as it is used.

Information requested during the last visit has still not been received (schedule of works for access to the monitoring point; monitoring results for 2018-2019; new floor plan and a copy of the inhouse maintenance checklist). Maintenance checklist again could not be located during the site visit. Evidence of the following is required:

- Maintenance checklist
- STL certificate to demonstrate date of last service
- Training matrix
- Up to date floor plan
- All monitoring results

Cont.

An opportunity was provided for the operator to submit the required information prior to the risk assessment being completed, however the operator failed to make contact or send in any information and therefore the breaches of conditions and lack of information available on site has been taken into account in the above risk assessment.

Breach of permit not leading to formal action:

Conditions 9 & 21 – Maintenance/Service information not available

Condition 35 – Training information not available

The lack of annual emission monitoring has resulted in an Enforcement Notice being served.

The risk score is such that the process has now moved into the high-risk category. Following government guidance this means the site will require two 'full' inspections (checking compliance with all conditions) and one 'check' inspection (to follow up any areas of concern or other matters arising from the full inspection). This also means, the annual subsistence fee will increase, as per my emails of 31st March 2020 and 1st June 2020.
