

## Risk Assessment for Local Air Pollution Control

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

Discussed with: Glenn Ford LA Reference: B01/02

Inspector's Name: Claire Braybrook Date: 22/09/2020

### 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	1
(D) >500m*	0	0	0
* 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.			
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	
<b>Total Score for Environmental Impact Appraisal</b>	<b>Range 0 to 70</b>	<b>32</b>	

## 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			
<b>Total</b>	<b>(Max. 55)</b>			<b>35</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 80)</b>			
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
<b>Total score</b>	<b>(-5 to 45)</b>			<b>35</b>
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
<b>Total</b>	<b>(-5 to 25)</b>			<b>5</b>
<b>Total Score for Operator Performance Appraisal</b>	<b>Range -10 to 105 (150)</b>			<b>75</b>

<b>Overall scores</b>	<b>Score given</b>
<i>Environmental Impact Appraisal</i>	
Inherent Environmental Impact Potential	<b>20</b>
Progress with Upgrading	<b>0</b>
Sensitivity and Proximity of Receptors	<b>12</b>
Other Targets	<b>0</b>
<i>Operator Performance Appraisal</i>	
Compliance Assessment	<b>35</b>
Assessment of Monitoring, Maintenance and Records	<b>35</b>
Assessment of Management, Training and Responsibility	<b>5</b>
Total score	<b>107</b>

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

## Comments

This visit was completed to discuss the situation as the enforcement notice is due to expire shortly.

The site is currently risk assessed as high risk and will therefore have a minimum of three inspections this financial year (2020/2021), consisting of at least two full inspections and one check. This inspection constitutes the first full inspection.

Following the last visit 6 months ago little has changed on site.

The required documentation is yet to be received. The operator has stated this is all in hand and information will be sent through imminently. The emissions monitoring, which is the subject of the enforcement notice, has been sourced, however the operator needs to get a scaffolder in to provide sufficient access. This was an issue previously, and the operator was aware of this requirement. The operator will keep us fully informed regarding the situation and the provision of information.

To clarify, 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

As the previously highlighted issues continue to be outstanding the risk assessment score remains the same for this visit.