

Risk Assessment for Local Air Pollution Control

Name of permitted activity: Timpsons Ltd PG Note: PG6/46

Discussed with: Margarita LA Reference: B03/08

Inspector's Name: Dave Bass Date: 12/11/2014

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			
Total	(Max. 50)			0
* 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?	0	10	0	0
(B) Monitoring requirements reduced because results over time show consistent compliance?	0	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?	-5	10	0	-5
Total score	(-5 to 35)			-5

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
Total	(-5 to 25)			-5
Total Score for Operator Performance Appraisal	Range -10 to 110			-10

Overall scores	Score given
<i>Operator Performance Appraisal</i>	
Compliance Assessment	0
Assessment of Monitoring, Maintenance and Records	-5
Assessment of Management, Training and Responsibility	-5
Total score	-10

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

Comments

Daily loads and solvents records kept and passed onto head office that collate and submit the VOC usage data. Annual data due but still within submission time, site not told if they are meeting the limit. 3 members are trained on the dry cleaning machines. Operating manual and other records kept on site. Company operate ISO14001 but no evidence that any of the findings are communicated with staff nor does there appear to be any evidence that there are any environmental improvements being made on site due to the ISO14001 process. The solvent tins have a lip on them which prevent all the solvents being emptied and could distort the solvent usage figures as well as making issues for storage of "empty" tins and waste collection an issue.