

## Risk Assessment for Local Air Pollution Control

Name of permitted activity: Sundown Straw Products PG Note: PG6/26(11)  
 Discussed with: Steve Rodgers & Klaudiusz Lenartowicz LA Reference: B03/94  
 Inspector's Name: Claire Braybrook Date: 27/11/2018

### 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*	10 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. 55)</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 80)</b>			
Scoring for Component 2 - 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	40	0	0
(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	40	0	0
(D) Fully documented and adhered to maintenance programme, in line with permit?	0	40	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	40	0	0
<b>Total score</b>	<b>(-5 to 45)</b>			<b>0</b>

Component 3 - 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	0
<b>Total</b>	<b>(-5 to 25)</b>			<b>0</b>
<b>Total Score for Operator Performance Appraisal</b>	<b>Range -10 to 105 (150)</b>			<b>0</b>

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

<b>OVERALL SCORE FOR THE PROCESS</b>	Range -10 to 175 (200)	<b>0</b>
<b>REGULATORY EFFORT CATEGORY</b> * high=score of >50, medium 30-50 and low <30	LOW, MED, HIGH	<b>LOW</b>

## Comments

The pelleting plant has been described as a self-recycling enclosed system as any waste is put back through the process. Please ensure that Condition 1(a) is logged so compliance can be demonstrated. Emissions monitoring was undertaken in April 2018, whilst testing will not be required for the bedding plant (once the Permit is surrendered), please ensure Condition 1(b) continues to be monitored. HMI system monitors the process automatically and highlights any issues. Maintenance is recorded on the 'Piranha system'. Condition 11(c) requires a written odour response plan, please send me a copy of this. Training records available and seen.

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All dusts are returned to the process. Operator is investigating the purchase of an ATEX rated

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hoover and looking to improve cleaning. Planned Preventative Maintenance will also be introduced.

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Site inspection undertaken. Lots of dust within the building, a lot of build-up on structures and

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equipment. Operator is aware of this and looking to make improvements.

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