

Risk Assessment for Local Air Pollution Control

Name of permitted activity: Sundown Straw Products **PG Note:** PG6/26(13)

Discussed with: Klaudiusz Lenartowicz **LA Reference:** B03/94

Inspector's Name: Claire Braybrook **Date:** Visit: 22/08/2019
RA: 30/09/2019

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			
Total	(Max. 55)			0
<i>* 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.</i>				
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 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	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	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	5
(F) All relevant documents forwarded to the authority by date required?	0	10	0	10
Total score	(-5 to 45)			25

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
Total	(-5 to 25)			0
Total Score for Operator Performance Appraisal	Range -10 to 105 (150)			0

Overall scores	Score given
<i>Operator Performance Appraisal</i>	
Compliance Assessment	0
Assessment of Monitoring, Maintenance and Records	25
Assessment of Management, Training and Responsibility	0
Total score	25

OVERALL SCORE FOR THE PROCESS	Range -10 to 175 (200)	25
REGULATORY EFFORT CATEGORY * high=score of >50, medium 30-50 and low <30	LOW, MED, HIGH	LOW

Comments

The process is the same; there have been no changes on site. Hoover has been purchased – site is noticeably cleaner than during my previous visit. PPM has been introduced but not currently accessible due to staff absence. This and evidence of maintenance documents/checks to be sent through.

Risk Assessment (RA) not completed on site as time given to operator to provide additional information as per e-mail dated 10th September. Additional information provided 23rd September. Proof received that daily checks introduced for emission monitoring (Condition 1A of Permit) and Environmental training & toolbox talks. No information available regarding maintenance, due to staff changes. Therefore score of 5 given under component 2E above. No further score added regarding this aspect as the HMI system monitors the process automatically and highlights any issues and there is a system for logging maintenance (Piranha system) these were seen during the previous visit. Evidence of maintenance will be required during the next visit; otherwise a score for components 2D and 1C above will be included.

Odour response plan (Condition 11C of your Permit) – advice was provided within my e-mail of 10th September, which also agreed a date of submission of prior to April 2020.

Overall the company appears to have made progress with environmental compliance and the site was much cleaner than noted at my previous visit, although the plant was not operational during this visit due to scheduled downtime and maintenance being completed.

Emissions monitoring was undertaken in July 2019, demonstrating compliance. Previous monitoring was completed in April 2018, which was agreed at the time would cover the period April 2017 – March 2018, as it was overdue. Due to the surrender of the timber process Permit (B02/06) for the animal bedding, the operator overlooked emission monitoring for the 2018/2019 year, even though the need for this was highlighted in the last risk assessment. As monitoring has now been completed (July) we discussed this covering the period April 2019 – March 2020. This means the operator receives a score under both components 2A and 2F above as no monitoring was completed to cover the period April 2018 – March 2019. If there are further issues with the completion of monitoring in financial year 2020 – 2021 a score will be given under component 1C as well.

It should also be highlighted that as well as increasing the risk score and therefore risk category (increasing the annual subsistence fee) an enforcement notice may also be served if Permit conditions are not adhered to.
