

Risk Assessment for Local Air Pollution Control

Name of permitted activity: IKO Insulations UK **PG Note:** PG6/29(12)
Discussed with: Matt Waine & Mark Thorne **LA Reference:** B04/18
Inspector's Name: Claire Braybrook **Date:** Visit: 06/06/2019
Visit: 08/10/2019
RA: 27/11/2019

Environmental Impact Appraisal

Component 1 - Inherent Environmental Impact Potential			
APRR Risk Rating Category	Possible Scores	Score Awarded	
(A) Category 1	10		
(B) Category 2	20		
(C) Category 3	30	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	10		
(C) Upgrading complete and meets BAT Requirements	0	0	
(D) Emissions control exceeds BAT Requirements	-10		
Component 3 - Sensitivity and Proximity of Receptors			
	Sensitivity of Receptors		
Proximity to Emission Source	High	Medium	Low
(A) < 100m*	20	12	5
(B) 100 - 250m*	12	10	3
(C) 250 - 500m*	5	3	1
(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	10		
(B) No such air pollution problems	0	0	
Total Score for Environmental Impact Appraisal	Range 0 to 70	40	

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*	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.				
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 75)			0
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	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	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?	0	5	0	0
Total score	(-5 to 30)			0
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	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	-5
Total	(-5 to 25)			-5
Total Score for Operator Performance Appraisal	Range -10 to 105 (130)			-5

Overall scores	Score given
<i>Environmental Impact Appraisal</i>	
Inherent Environmental Impact Potential	30
Progress with Upgrading	0
Sensitivity and Proximity of Receptors	10
Other Targets	0
<i>Operator Performance Appraisal</i>	40
Compliance Assessment	0
Assessment of Monitoring, Maintenance and Records	0
Assessment of Management, Training and Responsibility	-5
Total score	35

OVERALL SCORE FOR THE PROCESS	Range -10 to 175 (200)	35
REGULATORY EFFORT CATEGORY		
* high=score of >80, medium 40-80 and low <40	LOW, MED, HIGH	LOW

Comments

Visit completed on request from the company due to management changes and new management wanting to understand the requirements of the Permit. First visit 6th June – detailed discussion regarding the requirements of the Permit. Some information available but various outstanding aspects, as highlighted in my email of 10 June. Operator formulated an Environment Action Plan, received on 19 June, listing all actions required, who is responsible and comments. Future visit agreed. Second visit completed 8th October. Many actions completed and a greater understanding of the requirements of the Permit.

Issue recently found with bag filters, possibility of a couple of splits. The bags have been identified and will be replaced (confirmation of completion to be received). All bag filters are going to be replaced in the August 2020 shut down period in order to allow a new indicative monitor to be installed. The current unit only measures increases in pressure (due to blockages) and not decreases (due to bag splits/tears etc).

Preventative maintenance system in place. Daily checks, training records, SOP for MDI deliveries all seen.

Emissions monitoring to take place shortly – evidence of quotation gained. Particulate monitoring also being completed as indicative monitoring not currently sufficient. (Received 06/11/2019 – both Isocyanates and Particulates well within limits of Permit). Advice provided regarding indicative monitoring and alarms, in line with condition 11 & 14.

Completed site inspection on both visits and no issues noted. All staff very proactive and positive in sourcing information for compliance. No specific Environmental Management System in place but due to the numerous Standard Operating Procedures in place in order to protect the environment as well as management commitment I consider component 7F of the risk assessment is currently being met.