

## 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: 22/09/2020

### 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		
(D) Emissions control exceeds BAT Requirements	-10	-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
<p>* All distances should be multiplied by a factor of 2 for mineral and cement &amp; lime processes and by a factor of 4 for combustion, incineration (not cremation), iron &amp; steel and non-ferrous metal processes.            Note: Distances should be measured from the process itself, rather than the site boundary.</p>			
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	
<b>Total Score for Environmental Impact Appraisal</b>	<b>Range 0 to 70</b>	<b>30</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*	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			
<b>Total</b>	<b>(Max. 50)</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 75)</b>			<b>0</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	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	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
<b>Total score</b>	<b>(-5 to 30)</b>			<b>0</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	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
<b>Total</b>	<b>(-5 to 25)</b>			<b>-5</b>
<b>Total Score for Operator Performance Appraisal</b>	<b>Range -10 to 105 (130)</b>			<b>-5</b>

Overall scores	Score given
<i>Environmental Impact Appraisal</i>	
Inherent Environmental Impact Potential	30
Progress with Upgrading	-10
Sensitivity and Proximity of Receptors	10
Other Targets	0
<i>Operator Performance Appraisal</i>	30
Compliance Assessment	0
Assessment of Monitoring, Maintenance and Records	0
Assessment of Management, Training and Responsibility	-5
Total score	25

<b>OVERALL SCORE FOR THE PROCESS</b>	Range -10 to 175 (200)	<b>25</b>
<b>REGULATORY EFFORT CATEGORY</b> * high=score of >80, medium 40-80 and low <40	LOW, MED, HIGH	<b>LOW</b>

## Comments

Site visit completed.

Continuous emissions monitoring system (Scheuch Dust Sensor) has now been fitted. The alarm level is set to 25% of the limit and if activated, the extraction system automatically stops. If no action is taken to resolve this within 3 hours the production line is automatically shut down. This control system is considered to exceed BAT requirements and has resulted in a score of -10 for component 2 above.

Currently it is intended that the CEM will be serviced annually by the manufacturer.

Discussed monitoring requirement within Permit and a Permit variation is required to amend condition 17 to ensure this is clear. This will be completed by the end of October 2020.

SOP for pentane delivery to be sent through. Document entitled '*Receiving Pentane Delivery*', Reference *SOP – P005WE*, Issue: A, Issued By: MTE/PG/CDT and dated: 24/06/2020, received and agreed via email 5<sup>th</sup> October 2020.

Operator has recently assessed and made improvements to the site drainage system to ensure any spillages are adequately contained on the site, including locating and ensuring interceptor valves are fully functional and accessible, and marking drainage covers to enable easy identification.

All bag filters have been replaced during the August shut down to enable the new CEM system to be installed. Preventative maintenance system in place. Daily checks completed, recorded and checked by management. Extensive training matrix in place.

Completed site inspection and no issues noted, site exceptionally clean and tidy including by block briquette machine.

Operator currently in process of applying for ISO 14001.