

## Risk Assessment for Local Air Pollution Control

**Name of permitted activity:** Linx Printing Technologies Ltd      **PG Note:** PG6/44  
**Discussed with:** Darren Page-Mitchell and Dan Barnes      **LA Reference:** B04/94  
**Inspector's Name:** Claire Braybrook      **Date:** 01/08/2019

### Environmental Impact Appraisal

Component 1 - Inherent Environmental Impact Potential					
APRR Risk Rating Category	Possible Scores	Score Awarded			
(A) Category 1	<b>10</b>	<b>10</b>			
(B) Category 2	20				
(C) Category 3	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	<b>0</b>	<b>0</b>			
(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	<b>12</b>	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 &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.</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	<b>0</b>	<b>0</b>			
Total Score for Environmental Impact Appraisal		Range 0 to 70	<b>22</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			0
(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 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	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 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 (150)</b>			<b>-5</b>

<b>Overall scores</b>	<b>Score given</b>
<i>Environmental Impact Appraisal</i>	
Inherent Environmental Impact Potential	<b>10</b>
Progress with Upgrading	<b>0</b>
Sensitivity and Proximity of Receptors	<b>12</b>
Other Targets	<b>0</b>
<i>Operator Performance Appraisal</i>	
Compliance Assessment	<b>0</b>
Assessment of Monitoring, Maintenance and Records	<b>0</b>
Assessment of Management, Training and Responsibility	<b>-5</b>
<b>Total score</b>	<b>17</b>

<b>OVERALL SCORE FOR THE PROCESS</b>	Range -10 to 175 (200)	<b>17</b>
<b>REGULATORY EFFORT CATEGORY</b> * high=score of >80, medium 40-80 and low <40	LOW, MED, HIGH	<b>LOW</b>

## Comments

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The new ink facility is currently on hold due to uncertainty regarding Brexit. To ensure compliance with the Enforcement Notice served on 7<sup>th</sup> August 2018 (due to the breach of the VOC emission limit – Condition 3 of the Environmental Permit), further investigative and remedial action was completed. Investigation report was received on 18<sup>th</sup> April 2019. Problems found with the damper plate and corrective action taken including review of working practices and introduction of preventative maintenance and audits to ensure no further issues. Retesting demonstrated compliance.

Review of procedures undertaken for change overs in the ink plant to make them more efficient. Completed mid-July and Standard Operating Procedures updated (please send a copy). This has improved efficiency and reduced cleaning time so therefore will help to reduce solvent emission. Servicing is scheduled and contractors used where internal staff not qualified.

Documentation seen, maintenance and solvent calculation to be sent prior to Risk Assessment being completed (received 18<sup>th</sup> October 2019).

Site not in operation during visit as finished for the day. The company have ISO14001 status.

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