

Risk Assessment for Local Air Pollution Control

Name of permitted activity: Mick George Concrete – Brampton East **PG Note:** PG3/1

Discussed with: Garry Woodcock **LA Reference:** B08/17

Inspector's Name: Claire Braybrook **Date:** 18/03/2020

Operator Performance Appraisal

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*	5 per incident			
(C) Breach of permit not leading to formal action	10 per incident			10
(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)			10
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) Process operation modified where any problems indicated by monitoring?	0	5	0	0
(C) Fully documented and adhered to maintenance programme, in line with permit?	0	5	0	0
(D) Does the operator keep records of inspections, tests and monitoring in relation to the provisions of the permit and make them available to the regulator on request?	0	5	0	0
(E) All relevant notifications forwarded to the authority by date required?	0	40	0	0
Total score	(0 to 35)			0

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	5	0	-5
Total	(-5 to 30)			-5
Total Score for Operator Performance Appraisal	Range -5 to 115 (130)			5

Overall scores	Score given
<i>Operator Performance Appraisal</i>	
Component 1: Compliance Assessment	10
Component 2: Assessment of Monitoring, Maintenance and Records	0
Component 3: Assessment of Management, Training and Responsibility	-5
Total score	5

OVERALL SCORE FOR THE PROCESS	Range -10 to 175 (200)	5
REGULATORY EFFORT CATEGORY * high=score of >80, medium 40-80 and low <40	LOW, MED, HIGH	LOW

Comments

Batching plant has been relocated to the Ellington site and is now up and running there. Score of 10 given for breaching Permit condition number 21 as no notification of change to process received. Paperwork to be completed regarding relocation. Due to the Coronavirus and resultant H&S requirements a site visit was unable to take place, however, the Environmental Permit inspection was completed via telephone and information requested to demonstrate compliance. This was received via email on 15/04/2020, with the exception of the daily/weekly/monthly completed check sheets as these are held in hard copy at a closed site with no current access due to H&S issues (again Coronavirus). These will be sent through when access is gained.

Discussion confirmed Environmental Logbook is completed with daily, weekly and monthly checks & maintenance. Silos are checked daily, filters checked weekly. Alarm tested and PRV's checked prior to each delivery. This is controlled by an electronic system that does not allow a delivery to be made to the silos until the test is completed. Delivery takes place at 1 bar and vehicles have an auto stop if any issues.

The company Silo Services complete an annual service on the silos. Weekly defect sheet completed to highlight maintenance requirements.
Training requirements checked annually. Operator has ISO14001.