

Risk Assessment for Local Air Pollution Control

Name of permitted activity: Encocam Ltd **PG Note:** N/A
Discussed with: Roman Mucha, Benjamin Asenso Gyamera & Patricia Andrade **LA Reference:** B09/14
Inspector's Name: Claire Braybrook **Date:** 10/03/2020

Environmental Impact Appraisal

Component 1 - Inherent Environmental Impact Potential			
APRR Risk Rating Category	Possible Scores	Score Awarded	
(A) Category 1	40		
(B) Category 2	20	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	40		
(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	42	5
(B) 100 - 250m*	42	40	3
(C) 250 - 500m*	5	3	4
(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	40		
(B) No such air pollution problems	0	0	
Total Score for Environmental Impact Appraisal	Range 0 to 70	15	

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*	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
* 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 80)			
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
Total score	(-5 to 45)			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 (150)			-5

Overall scores	Score given
<i>Environmental Impact Appraisal</i>	
Inherent Environmental Impact Potential	20
Progress with Upgrading	-10
Sensitivity and Proximity of Receptors	5
Other Targets	0
<i>Operator Performance Appraisal</i>	
Compliance Assessment	0
Assessment of Monitoring, Maintenance and Records	0
Assessment of Management, Training and Responsibility	-5
Total score	10

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

Comments

No problems on site since my previous visit.

System is protected and shuts down if there are any issues with the scrubbers. If the spill alarm is activated the sewer is blocked off automatically. Visible emissions from the scrubbers are checked daily and the storage area is checked twice a week with a portable HF emissions detector. All recorded and logged.

Spill teams are regularly trained and lots of staff are part of this, enabling a high level of cover. Spill kits are regularly checked and are tagged to allow quick and easy identification of any use.

The company are planning to change the pump to improve accuracy.

Company use Select HR system which logs maintenance requests, enables tasks and any issues to be raised, covers preventative maintenance, and offers a complete audit train. This was demonstrated and all required records seen. Significant knowledge of systems and minimising risk to the environment was demonstrated along with the desire for continuous improvement. Whilst there is no Process Guidance Note for this activity it is considered the systems in place go beyond those required within the Environmental Permit resulting in lower emissions. The last monitoring results demonstrate good compliance with the emission limits. -10 given for component 2D.

Alarms are covered 24/7 so if there are any issues they are investigated immediately. Still only scrubber 1 is connected to HF.

Site inspection completed, including within the storage area. No issues noted. Company has ISO14001. A high standard of housekeeping and control measures remain in place.