

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:** 25/09/2020

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
<p>* 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.</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	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

Site inspection completed remotely due to Covid. No problems on site since my previous visit. Process remains the same. Review of Permit completed – no issues.

Weekly checks are completed and logged in line with condition 5. Work instructions continue to be updated on an ongoing basis – ensuring continuous improvement. Comprehensive training for spills, with particular focus on prevention. Heat recovery and energy management project underway to investigate improvements.

Operators are constantly looking at best techniques to reduce handling of/contact with HF. Improvements continue to be made as part of an ongoing larger project covering handling, transport and emissions.

The sump pump is being replaced – currently on site, awaiting contractor for installation – delay due to Covid. This is automatic so if the level goes up the pump will kick in and remove any spillages to the waste compound which is fully contained.

The company will soon be replacing the first HF detection sensors within container – these will be set at 2ppm which is well within the emission limit – any issues will result in an alert being sent and closure of the valve to the pumps. Daily/weekly checklist seen for chemical area.

If there is an incident on site, the pipes will be flushed with water to reduce chemical handling. If the spill alarm is activated the valves in the vicinity are closed, preventing further chemical entering the site.

Other control measures within last year's risk assessment remain in place. All required records available on site. The team continue to demonstrate significant knowledge of systems and continuous improvement to minimise risk to human health and the environment. Company has ISO14001. A high standard of housekeeping and control measures remain in place.

It is considered the operator continues to exceed BAT requirements for emission control, resulting in a score of -10 for component 2D.