Huntingdonshire DISTRICT COUNCIL

Risk Assessment for Local Air Pollution Control

Name of permitted activity: VIP Polymers Ltd **PG Note:** PG6/28

Discussed with: Neil & Dan **LA Reference:** B11/94

Inspector's Name: Dave Bass **Date:** 14/07/2017

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**		**0**
(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~~	**12**	~~5~~
(B) 100 - 250m*	~~12~~	~~10~~	~~3~~
(C) 250 - 500m*	~~5~~	~~3~~	~~1~~
(D) >500m*	~~0~~	~~0~~	~~0~~
* *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.*			
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**
Total Score for Environmental Impact Appraisal	**Range 0 to 70**		**42**

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	10	0	**0**
(B) Monitoring requirements reduced because results over time show consistent compliance?	-5	0	0	**-5**
(C) Process operation modified where any problems indicated by monitoring?	0	10	0	**0**
(D) Fully documented and adhered to maintenance programme, in line with permit?	0	10	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	10	0	**0**
Total score	**(-5 to 45)**			**-5**

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)**	**-10**

Overall scores	Score given
Environmental Impact Appraisal	
Inherent Environmental Impact Potential	**30**
Progress with Upgrading	**0**
Sensitivity and Proximity of Receptors	**12**
Other Targets	**0**
Operator Performance Appraisal	
Compliance Assessment	**0**
Assessment of Monitoring, Maintenance and Records	**-5**
Assessment of Management, Training and Responsibility	**-5**
Total score	**32**

OVERALL SCORE FOR THE PROCESS	Range -10 to 175 (200)	**32**
REGULATORY EFFORT CATEGORY *** high=score of >80, medium 40-80 and low <40**	LOW, MED, HIGH	**LOW**

Comments

Company is still merging several ISO standards into one so while they do not have ISO14001 accreditation they are working in accordance with its ideals. Emission test not due until later in year but data from Banbury line shows well within limits. The company is still updating/purchasing new plant when required. Maintenance is undertaken both by internal and external, they have changed the reporting so they understand better when and why breakdowns occur. Training is undertaken and records kept. They are planning on increasing the building size but this won't require any permit variation.