

## Risk Assessment for Local Air Pollution Control

Name of permitted activity: Kleeman PL659 PG Note: PG3/16(12)

Discussed with: Mick P & Jon W LA Reference: B16/14

Inspector's Name: Dave Bass Date: 17/11/2016

### 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			
(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. 50)</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 75)</b>			
Scoring for Component 2 - Assessment of Monitoring, Maintenance and Records				
Criterion	Possible Scores			Scores Awarded
	Yes	No	N/A	
(A) Are emissions monitored as required in the permit? Are emissions and emissions monitoring recorded as required in the permit?	<b>0</b>	<del>10</del>	<del>0</del>	<b>0</b>
(B) Monitoring requirements reduced because results over time show consistent compliance?	<b>0</b>	<del>0</del>	<del>0</del>	<b>0</b>
(C) Is an appropriate maintenance schedule in place and available on request?	<b>0</b>	<del>5</del>	<del>0</del>	<b>0</b>
(D) Fully documented and adhered to maintenance programme, in line with permit?	<b>0</b>	<del>5</del>	<del>0</del>	<b>0</b>
(E) Full documented records as required in permit available on-site?	<b>0</b>	<del>5</del>	<del>0</del>	<b>0</b>
(F) Has the operator notified the regulator promptly of all relocations of all plant?	<b>-5</b>	<del>10</del>	<del>0</del>	<b>-5</b>
<b>Total score</b>	<b>(-5 to 35)</b>			<b>-5</b>

Component 3 - Assessment of Management, Training and Responsibility				
Criterion	Possible Scores			Scores Awarded
	Yes	No	N/A	
(A) Are procedures in place to ensure proper management, supervision and training for process operations, proper use of equipment and effective preventative maintenance on all plant and equipment concerned with the control of emissions to air?	0	5	0	0
(B) Specific responsibilities assigned to individual staff for these procedures?	0	5	0	0
(C) Does the operator maintain, and make available on request, a statement of training requirements for each operational post?	0	5	0	0
(D) Are all staff with responsibility for operating the process sufficiently trained to be aware of their responsibilities under the permit, minimising emissions on start up and shut down and taking action to minimise emissions during abnormal conditions?	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 110 (135)</b>			<b>-10</b>

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

<b>OVERALL SCORE FOR THE PROCESS</b>	Range -10 to 110 (135)	<b>-10</b>
<b>REGULATORY EFFORT CATEGORY</b>		
* high=score of >55, medium 30-55 and low <30	LOW, MED, HIGH	<b>LOW</b>

### Comments

Full records kept at head office with operator having weekly emission sheets.

Maintenance undertaken by internal maintenance plant and all staff trained on use of the plant.

Company has installed a new system that keeps records of all weekly emission sheets, locations, maintenance and other inspections. Company has ISO14001.