

## Risk Assessment for Local Air Pollution Control

Name of permitted activity: Henkel UK Operations Ltd PG Note: PG6/28 & PG6/44

Discussed with: Mr Glenn Draper LA Reference: B19/93

Inspector's Name: Claire Braybrook Date: 11/12/2018

### 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                       |               |     |
| (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   | 40                       |               |     |
| (C) Upgrading complete and meets BAT Requirements  | 0                        | 0             |     |
| (D) Emissions control exceeds BAT Requirements   | -40                      |               |     |
| 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   |
| * 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.<br>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   | 40                       |               |     |
| (B) No such air pollution problems   | 0                        | 0             |     |
| <b>Total Score for Environmental Impact Appraisal</b>  | <b>Range 0 to 70</b>     | <b>50</b>     |     |

## 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               |    |     |                |
| <b>Total</b>  | <b>(Max. 55)</b>              |    |     | <b>0</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 80)</b>               |    |     |                |
| 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              |
| <b>Total score</b>  | <b>(-5 to 45)</b>             |    |     | <b>0</b>       |
| 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             |
| <b>Total</b>  | <b>(-5 to 25)</b>             |    |     | <b>-5</b>      |
| <b>Total Score for Operator Performance Appraisal</b>   | <b>Range -10 to 105 (150)</b> |    |     | <b>-5</b>      |

| <b>Overall scores</b>                                 | <b>Score given</b> |
|---|--------------------|
| <i>Environmental Impact Appraisal</i>                 |                    |
| Inherent Environmental Impact Potential               | <b>30</b>          |
| Progress with Upgrading                               | <b>0</b>           |
| Sensitivity and Proximity of Receptors                | <b>20</b>          |
| Other Targets   | <b>0</b>           |
| <i>Operator Performance Appraisal</i>                 |                    |
| Compliance Assessment                                 | <b>0</b>           |
| Assessment of Monitoring, Maintenance and Records     | <b>0</b>           |
| Assessment of Management, Training and Responsibility | <b>-5</b>          |
| <b>Total score</b>                                    | <b>45</b>          |

|   |                        |               |
|---|------------------------|---------------|
| <b>OVERALL SCORE FOR THE PROCESS</b>          | Range -10 to 175 (200) | <b>45</b>     |
| <b>REGULATORY EFFORT CATEGORY</b>             |                        |               |
| * high=score of >80, medium 40-80 and low <40 | LOW, MED, HIGH         | <b>MEDIUM</b> |

## Comments

Major services and checks undertaken 2 x per year. Maintenance is all logged on a computerised management system. Deliveries overseen by staff. Condition 31 – all have alarms but current project to install interlocks. Emission testing taking place during inspection. Records and documentation seen. No issues. Full site walk around to take place during ‘check’ visit due before end of March. Possibility that site production may increase, depending on company decisions.