

Risk Assessment for Local Air Pollution Control

Name of permitted activity: Xaarjet Ltd PG Note: PG6/45(11)

Discussed with: David Eggleden LA Reference: B22/11

Inspector's Name: Claire Braybrook Date: 17/09/2020

Environmental Impact Appraisal

Component 1 - Inherent Environmental Impact Potential			
APRR Risk Rating Category	Possible Scores		Score Awarded
(A) Category 1	10		20
(B) Category 2	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		0
(B) Upgrading not yet complete and PG Note deadline has passed	10		
(C) Upgrading complete and meets BAT Requirements	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		0
(B) No such air pollution problems	0		
Total Score for Environmental Impact Appraisal	Range 0 to 70		30

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	0
Sensitivity and Proximity of Receptors	10
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	25

OVERALL SCORE FOR THE PROCESS	Range -10 to 175 (200)	25
REGULATORY EFFORT CATEGORY * high=score of >80, medium 40-80 and low <40	LOW, MED, HIGH	LOW

Comments

Permit inspection undertaken remotely via Teams due to Covid-19.

The site recorded a failure in the emissions monitoring undertaken in January, however after remedial action was taken, the re-test in March demonstrated compliance. The stack that failed serves the waste station inside the cleanroom. This was turned off whilst a full investigation was completed, which found that the pump responsible for moving the waste was continuously on (therefore agitating the waste, leading to vapour release and forced extraction via the stack), and the fittings for this waste storage container did not match the others in use. Remedial actions taken were to ensure the pump only operates when waste is required to be moved, and replacement of fittings at the top of the waste container to effectively seal it off with a non-return valve, releasing pressure as necessary. The amount of waste disposed of within this decanting station over a 2 hour period has also been reviewed and limited to minimise the risk of breaching emission limits. The actions within condition 7 regarding a breach in emission limits were followed. All emission points serving locations with solvents are tested – 7 in total. All now within limit, some substantially. Advised operator to keep an eye on the decanting station that had the failure.

Fugitive emissions calculations seen, demonstrating compliance with condition 6.

Planned Preventative Maintenance is undertaken, regular maintenance and checks completed. Filters changed periodically. Canopy area inspected at least weekly; spill kits usually checked fortnightly, although due to Covid (less people on site and requirements for social distancing) some checks have been at a slightly reduced frequency. Maintenance records to be sent through – received via email 17/09/2020. PPM for the LEV includes 14 monthly external report and belts for the extraction fan changed annually. Alarm system present on LEV system with visual indicator to detect a drop in air flow/pressure, Facilities team can also live monitor the air flows of all LEV's and this is checked daily.

Training log seen – no changes in staff so no requirement for new training, refresher training completed as required.

Company has ISO14001 accreditation.
