

Risk Assessment for Local Air Pollution Control

Name of permitted activity:	Xaarjet Ltd	PG No	te: <u>PG</u>	66/45	5(11)
Discussed with:	Dave & Roy	LA Referenc	e: <u>B</u> 2	2/11	
Inspector's Name:	Dave Bass	Date: 29/01/2016			
· Environmental Impact Ap	nraical				
Component 1 - Inherent Environi					
APRR Risk Rating Category		Possible Scores		Score Awarded	
(A) Category 1	(A) Category 1		10		
(B) Category 2		20		20	
(C) Category 3		30			
Component 2 - Progress with Up	grading				
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 Pr	roximity of Receptors				
		Sensitivity of Receptors			
Proximity to Emission Source		High Mediur		ım	Low
(A) < 100m [*]		20	12		5
(B) 100 - 250m [*]		12	10		3
(C) 250 - 500m*		5	3		4
(D) >500m*		0	0		0
combustion, incineration (not crema	d by a factor of 2 for mineral and cement & ation), iron & steel and non-ferrous metal pro red from the process itself, rather than the si	cesses.	s and by	a fac	ctor of 4 for
Component 4 - Other Targets					
		Possible Scores		Score Awarded	
(A) Other air pollution problems potential contributor	in the local area to which process is a	10			
(B) No such air pollution problems		0			0
Total Score for Environmental Impact Appraisal Page 0 to 70		o 70		20	

Operator Performance Appraisal

(A) Incident leading to justified complaint but no breach of specific permit condition or of general/residual BAT condition (B) Incident leading to a justified complaint 5 (C) Breach of permit not leading to formal action 10 (D) Incident leading to formal caution, Enforcement Notice or prosecution 15 (E) Incident leading to a Prohibition Notice 20 Total 10 **Unjustified complaints may be e.g. those considered by the inspector to be unreasonal linked to an incident at the process. Where facility has been on Reduced Charge due to Mothballing or Reduced Operation to above the threshold requiring a permit at the installation in accordance with the acceptance letter 10 Total (applies only when condition F has been breached) Scoring for Component 6 - Assessment of Monitoring, Maintenance and Records 10 Criterion 10 Process operation modified where any problems indicated by monitoring? 10 (D) Fully documented and adhered to maintenance programme, in line with permit? 10 Pully documented and adhered to maintenance programme, in line with permit? 10 Pully documented records as required in permit available on-site? 10 Pully Incident Incide	25 (Max 75) Describe So No 10	ent ent ent eh cann	A A A	Scores Awarded O e clearly Scores Awarded O 0
condition or of general/residual BAT condition (B) Incident leading to a justified complaint 5 (C) Breach of permit not leading to formal action 10 (D) Incident leading to formal caution, Enforcement Notice or prosecution 15 (E) Incident leading to a Prohibition Notice 20 Total 20 **Unjustified complaints may be e.g. those considered by the inspector to be unreasonal linked to an incident at the process. Where facility has been on Reduced Charge due to Mothballing or Reduced Opera (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 Total (applies only when condition F has been breached) Scoring for Component 6 - Assessment of Monitoring, Maintenance and Records Criterion P. (A) All monitoring undertaken to the degree required in the permit? 0 (B) Monitoring requirements reduced because results over time show consistent compliance? (C) Process operation modified where any problems indicated by monitoring? 0 (D) Fully documented and adhered to maintenance programme, in line with permit? 0 (E) Full documented records as required in permit available on-site? 0 (F) All relevant documents forwarded to the authority by date required? 0 Total score Component 7 - Assessment of Management, Training and Responsibility Criterion P.	per incider per incider per incide per incide per incide per incide (Max. 50) ple or which ting Leve 25 (Max 75) possible Science No 10 0	ent	oot be	O e clearly Scores Awarded O
(C) Breach of permit not leading to formal action (D) Incident leading to formal caution, Enforcement Notice or prosecution (E) Incident leading to a Prohibition Notice 7 Total **Unjustified complaints may be e.g. those considered by the inspector to be unreasonal linked to an incident at the process. Where facility has been on Reduced Charge due to Mothballing or Reduced Operation to above the threshold requiring a permit at the installation in accordance with the acceptance letter Total (applies only when condition F has been breached) Scoring for Component 6 - Assessment of Monitoring, Maintenance and Records Criterion (A) All monitoring undertaken to the degree required in the permit? (B) Monitoring requirements reduced because results over time show consistent compliance? (C) Process operation modified where any problems indicated by monitoring? (D) Fully documented and adhered to maintenance programme, in line with permit? (E) Full documented records as required in permit available on-site? (F) All relevant documents forwarded to the authority by date required? Total score Component 7 - Assessment of Management, Training and Responsibility Criterion	per incide per incide per incide (Max. 50) ple or whice ting Leve 25 (Max 75) pssible Sc No 40 0	ent	/A	Scores Awarded
(D) Incident leading to formal caution, Enforcement Notice or prosecution (E) Incident leading to a Prohibition Notice Total **Unjustified complaints may be e.g. those considered by the inspector to be unreasonal linked to an incident at the process. Where facility has been on Reduced Charge due to Mothballing or Reduced Operation (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 Total (applies only when condition F has been breached) Scoring for Component 6 - Assessment of Monitoring, Maintenance and Records (A) All monitoring undertaken to the degree required in the permit? (B) Monitoring requirements reduced because results over time show consistent compliance? (C) Process operation modified where any problems indicated by monitoring? (D) Fully documented and adhered to maintenance programme, in line with permit? (E) Full documented records as required in permit available on-site? (F) All relevant documents forwarded to the authority by date required? Total score Component 7 - Assessment of Management, Training and Responsibility Criterion	per incide per incide per incide (Max. 50) ple or whice ting Leve 25 (Max 75) pssible Sc No 40	ent	/A	Scores Awarded
(E) Incident leading to a Prohibition Notice Total **Unjustified complaints may be e.g. those considered by the inspector to be unreasonal linked to an incident at the process. Where facility has been on Reduced Charge due to Mothballing or Reduced Operation (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 Total (applies only when condition F has been breached) Scoring for Component 6 - Assessment of Monitoring, Maintenance and Records (A) All monitoring undertaken to the degree required in the permit? (B) Monitoring requirements reduced because results over time show consistent compliance? (C) Process operation modified where any problems indicated by monitoring? (D) Fully documented and adhered to maintenance programme, in line with permit? (E) Full documented records as required in permit available on-site? (F) All relevant documents forwarded to the authority by date required? Total score Component 7 - Assessment of Management, Training and Responsibility Process operation of Management, Training and Responsibility	per incide (Max. 50) ble or whice ting Leve 25 (Max 75) Dessible So No 40	cores	/A	Scores Awarded
Total * Unjustified complaints may be e.g. those considered by the inspector to be unreasonal linked to an incident at the process. Where facility has been on Reduced Charge due to Mothballing or Reduced Operation to above the threshold requiring a permit at the installation in accordance with the acceptance letter Total (applies only when condition F has been breached) Scoring for Component 6 - Assessment of Monitoring, Maintenance and Records Criterion (A) All monitoring undertaken to the degree required in the permit? (B) Monitoring requirements reduced because results over time show consistent compliance? (C) Process operation modified where any problems indicated by monitoring? (D) Fully documented and adhered to maintenance programme, in line with permit? (E) Full documented records as required in permit available on-site? (F) All relevant documents forwarded to the authority by date required? Total score Component 7 - Assessment of Management, Training and Responsibility Process of the content of the permit available on the content of the permit available on the content of the authority by date required?	(Max. 50) ble or which ting Leve 25 (Max 75) Dessible So No 40 0	cores	/A	Scores Awarded
* Unjustified complaints may be e.g. those considered by the inspector to be unreasonal linked to an incident at the process. Where facility has been on Reduced Charge due to Mothballing or Reduced Operation (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 Total (applies only when condition F has been breached) Scoring for Component 6 - Assessment of Monitoring, Maintenance and Records (A) All monitoring undertaken to the degree required in the permit? (B) Monitoring requirements reduced because results over time show consistent compliance? (C) Process operation modified where any problems indicated by monitoring? (D) Fully documented and adhered to maintenance programme, in line with permit? (E) Full documented records as required in permit available on-site? (F) All relevant documents forwarded to the authority by date required? Total score Component 7 - Assessment of Management, Training and Responsibility Process of the control of the process of the p	ting Leve 25 (Max 75) ossible So No 40	cores N/	/A	Scores Awarded
Where facility has been on Reduced Charge due to Mothballing or Reduced Operation (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 Total (applies only when condition F has been breached) Scoring for Component 6 - Assessment of Monitoring, Maintenance and Records	25 (Max 75) Describe So No 10	cores N/	/A	Scores Awarded
(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 Total (applies only when condition F has been breached) Scoring for Component 6 - Assessment of Monitoring, Maintenance and Records Criterion (A) All monitoring undertaken to the degree required in the permit? (B) Monitoring requirements reduced because results over time show consistent compliance? (C) Process operation modified where any problems indicated by monitoring? (D) Fully documented and adhered to maintenance programme, in line with permit? (E) Full documented records as required in permit available on-site? (F) All relevant documents forwarded to the authority by date required? Total score Component 7 - Assessment of Management, Training and Responsibility Process operation to maintenance of the permit available on the sum of the permit	25 (Max 75) Describe So No 40 0	cores N/)	Awarded 0
above the threshold requiring a permit at the installation in accordance with the acceptance letter Total (applies only when condition F has been breached) Scoring for Component 6 - Assessment of Monitoring, Maintenance and Records Criterion (A) All monitoring undertaken to the degree required in the permit? (B) Monitoring requirements reduced because results over time show consistent compliance? (C) Process operation modified where any problems indicated by monitoring? (D) Fully documented and adhered to maintenance programme, in line with permit? (E) Full documented records as required in permit available on-site? (F) All relevant documents forwarded to the authority by date required? Total score Component 7 - Assessment of Management, Training and Responsibility Process on the format at the installation in accordance with the acceptance and Records Process operation Management, Training and Responsibility Process operation Management, Training and Responsibility	Ossible Solution No 40	N/)	Awarded 0
Total (applies only when condition F has been breached) Scoring for Component 6 - Assessment of Monitoring, Maintenance and Records Criterion (A) All monitoring undertaken to the degree required in the permit? (B) Monitoring requirements reduced because results over time show consistent compliance? (C) Process operation modified where any problems indicated by monitoring? (D) Fully documented and adhered to maintenance programme, in line with permit? (E) Full documented records as required in permit available on-site? (F) All relevant documents forwarded to the authority by date required? Total score Component 7 - Assessment of Management, Training and Responsibility Processing the cords and provided to the authority by the component of the cords and the cords are required and the cords are required?	No 10	N/)	Awarded 0
Criterion (A) All monitoring undertaken to the degree required in the permit? (B) Monitoring requirements reduced because results over time show consistent compliance? (C) Process operation modified where any problems indicated by monitoring? (D) Fully documented and adhered to maintenance programme, in line with permit? (E) Full documented records as required in permit available on-site? (F) All relevant documents forwarded to the authority by date required? Total score Component 7 - Assessment of Management, Training and Responsibility Criterion	No 10 0	N/)	Awarded 0
(A) All monitoring undertaken to the degree required in the permit? (B) Monitoring requirements reduced because results over time show consistent compliance? (C) Process operation modified where any problems indicated by monitoring? (D) Fully documented and adhered to maintenance programme, in line with permit? (E) Full documented records as required in permit available on-site? (F) All relevant documents forwarded to the authority by date required? Total score Component 7 - Assessment of Management, Training and Responsibility Process operation modified where any problems indicated by monitoring? 0 (F) Fully documented and adhered to maintenance programme, in line with permit? 0 (F) All relevant documents forwarded to the authority by date required? Process operation modified where any problems indicated by monitoring? 0 (E) Fully documented and adhered to maintenance programme, in line with permit? 0 (F) All relevant documents forwarded to the authority by date required? Process operation modified where any problems indicated by monitoring? Process operation modified where any problems indicated by monitoring? 0 (E) Fully documented and adhered to maintenance programme, in line with permit? 0 (F) All relevant documents forwarded to the authority by date required? Process operation modified where any problems indicated by monitoring? 0	No 10 0	N/)	Awarded 0
(A) All monitoring undertaken to the degree required in the permit? (B) Monitoring requirements reduced because results over time show consistent compliance? (C) Process operation modified where any problems indicated by monitoring? (D) Fully documented and adhered to maintenance programme, in line with permit? (E) Full documented records as required in permit available on-site? (F) All relevant documents forwarded to the authority by date required? Total score Component 7 - Assessment of Management, Training and Responsibility Process operation modified where any problems indicated by monitoring? 0 Criterion	1 0	e)	0
(B) Monitoring requirements reduced because results over time show consistent compliance? (C) Process operation modified where any problems indicated by monitoring? (D) Fully documented and adhered to maintenance programme, in line with permit? (E) Full documented records as required in permit available on-site? (F) All relevant documents forwarded to the authority by date required? Total score Component 7 - Assessment of Management, Training and Responsibility Process operation modified where any problems indicated by monitoring? 0 0 Criterion	0			
(C) Process operation modified where any problems indicated by monitoring? (D) Fully documented and adhered to maintenance programme, in line with permit? (E) Full documented records as required in permit available on-site? (F) All relevant documents forwarded to the authority by date required? Total score Component 7 - Assessment of Management, Training and Responsibility Criterion		0)	0
(D) Fully documented and adhered to maintenance programme, in line with permit? (E) Full documented records as required in permit available on-site? (F) All relevant documents forwarded to the authority by date required? Total score Component 7 - Assessment of Management, Training and Responsibility Criterion		_		
(E) Full documented records as required in permit available on-site? (F) All relevant documents forwarded to the authority by date required? Total score Component 7 - Assessment of Management, Training and Responsibility Criterion	5	€)	0
(F) All relevant documents forwarded to the authority by date required? Total score Component 7 - Assessment of Management, Training and Responsibility Criterion	5	€)	0
Total score Component 7 - Assessment of Management, Training and Responsibility Criterion	5	e)	0
Component 7 - Assessment of Management, Training and Responsibility Criterion	5	0)	0
Criterion	(-5 to 30)		0	
Criterion				
	Possible Scores			Scores
Yes	No	N/	Ά	Awarded
(A) Documented procedures in place for implementing all aspects of the permit?	5	e)	0
(B) Specific responsibilities assigned to individual staff for these procedures? 0	5	e)	0
(C) Completion of individual responsibilities checked and recorded by the company?	5	e)	0
(D) Documented training records for all staff with air pollution control responsibilities?	5	C)	0
(E) Trained staff on site throughout periods where potentially air-polluting activities take place?	5	e)	0
(F) Is an 'appropriate' environmental management system in place? -5	0	€)	-5
Total	(-5 to 25)		-5	
Total Score for Operator Performance Appraisal	•	Range -10 to 105 (130) -5		-5

Overall scores	Score given	
Environmental Impact Appraisal		
Inherent Environmental Impact Potential	20	
Progress with Upgrading	0	
Sensitivity and Proximity of Receptors	10	
Other Targets	0	
Operator Performance Appraisal		
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

Emission testing being undertaken during inspection. Following previous test, which breached, operator has changed the process to remove the offending solvents. While this was successful with regards to the product the emissions are yet unknown. Other changes to delivery and storage (using larger storage and pumping of solvents) has also been undertaken. No odours could be detected outside of cleanrooms and in raw material and waste storage areas. Company has an electronic based training system which everyone has to complete and is scored. Maintenance records kept and available when required. Company has ISO14001 accreditation. The fugitive emissions and solvent usage records were assessed during the inspection.