

# Risk Assessment Method for Local Air Pollution Control Score Sheet Revised July 2013

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| Name of authorised process/installation  | Bradleys (Stowmarket), 49 Knightsdale Road, Ipswich, Suffolk, IP1 4JJ. |
| Name of person with whom sheet discussed | Mick Cocks   |
| Process Guidance Note                    | 6/23   |
| Local Authority Reference                | 202100872  |
| Inspector's Name                         | Ben Atkinson   |
| Date                                     | 15 <sup>th</sup> February 2022   |

## Environmental Impact Appraisal

| <b>Component 1 – Inherent Environmental Impact Potential</b> |                        |                      |
|--|------------------------|----------------------|
| <b>APRR Risk Rating Category</b>                             | <b>Possible Scores</b> | <b>Score Awarded</b> |
| (A) Category 1   | 10                     | 0                    |
| (B) Category 2   | 20                     | 20                   |
| (C) Category 3   | 30                     | 0                    |

| <b>Component 2 - Progress with Upgrading</b>                          |                        |                      |
|---|------------------------|----------------------|
| <b>Status of Upgrading</b>  | <b>Possible Scores</b> | <b>Score Awarded</b> |
| (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                     | 0                    |
| (C) Upgrading complete and meets BATNEEC Requirements                 | 0                      | 0                    |
| (D) Emissions control exceeds BATNEEC Requirements                    | -10                    | 0                    |

| <b>Component 3 - Sensitivity and Proximity of Receptors (circle appropriate score)</b> |                                 |                |                |
|--|---------------------------------|----------------|----------------|
| <b>Proximity to Emission Source</b>  | <b>Sensitivity of Receptors</b> |                |                |
|  | <b>(x) High</b>                 | <b>(y) Med</b> | <b>(z) Low</b> |
| (A) < 100m*  | <b>20</b>                       | 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.

| <b>Component 3 – Other Targets</b>   |                        |                      |
|--|------------------------|----------------------|
|  | <b>Possible Scores</b> | <b>Score Awarded</b> |
| (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                      | 0                    |
| <b>Total for Environmental Impact Appraisal</b>  | <b>Range 0 to 70</b>   | <b>40</b>            |

## Operator Performance Appraisal

| <b>Component 5 - Compliance Assessment</b>   |                        |                      |
|--|------------------------|----------------------|
| <b>Scale of Non-Compliance</b>   | <b>Possible Scores</b> | <b>Score Awarded</b> |
| (A) Incident leading to justified complaint but no breach of any specific authorisation condition or of the general/residual BATNEEC condition             | 0                      | 0                    |
| (B) Incident leading to a justified complaint*   | 10 per incident        | 0                    |
| (C) Breach of authorisation not leading to formal action   | 10 per incident        | 0                    |
| (D) Incident leading to formal caution, Enforcement Notice or prosecution  | 15 per incident        | 0                    |
| (E) Incident leading to a Prohibition Notice or Suspension Notice  | 20 per incident        | 0                    |
| <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. |                        |                      |

| <b>Scoring for Component 6 - Assessment of Monitoring, Maintenance and Records</b>        |                        |                   |                    |                      |
|---|------------------------|-------------------|--------------------|----------------------|
| <b>Criterion</b>  | <b>Possible Scores</b> |                   |                    | <b>Score Awarded</b> |
|   | <b>(x)<br/>Yes</b>     | <b>(y)<br/>No</b> | <b>(z)<br/>N/A</b> |                      |
| (A) All monitoring undertaken to the degree required in the authorisation?                | 0                      | 10                | 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                      | 10                | 0                  | 0                    |

|  |                   |    |   |          |
|--|-------------------|----|---|----------|
| (D) Fully documented and adhered to maintenance programme, in line with authorisation? | 0                 | 10 | 0 | 0        |
| (E) Full documented records as required in authorisation available on-site?            | 0                 | 5  | 0 | 0        |
| (F) All relevant documents forwarded to the authority by date required?                | 0                 | 10 | 0 | 0        |
| <b>Total Score</b>   | <b>(-5 to 45)</b> |    |   | <b>0</b> |

| <b>Component 7 - Assessment of Management, Training and Responsibility</b>                          |                        |                   |                    |                      |
|---|------------------------|-------------------|--------------------|----------------------|
| <b>Criterion</b>  | <b>Possible Scores</b> |                   |                    | <b>Score Awarded</b> |
|   | <b>(x)<br/>Yes</b>     | <b>(y)<br/>No</b> | <b>(z)<br/>N/A</b> |                      |
| (A) Documented procedures in place for implementing all aspects of the authorisation?               | 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                  | 0                    |
| <b>Total Score</b>  | <b>(-5 to 25)</b>      |                   |                    | <b>0</b>             |

|   |                         |          |
|---|-------------------------|----------|
| <b>Total for Operator Performance Appraisal</b> | <b>Range -10 to 105</b> | <b>0</b> |
|---|-------------------------|----------|

|  |                         |            |
|--|-------------------------|------------|
| <b>Overall Score for the Process</b>                                     | <b>Range -10 to 195</b> | <b>40</b>  |
| <b>Regulatory Effort Category</b><br>High =>80, med = 40 – 80, low = <40 | <b>Low/Med/High</b>     | <b>MED</b> |