

## Risk Assessment Score Sheet for 'Reduced Fee' Activities

Name of permitted process: Simon Morris Ipswich Ltd, Unit 14 Bluestem Rd

PG Note 6/34(11)

Name of person with whom score sheet discussed: David Laird

Permit reference EP33/5/LB

Inspector's Name Ben Atkinson

Date 28<sup>th</sup> March 2017

### Operator Performance Appraisal

| Component 1 - Compliance Assessment   |                 |          |
|---|-----------------|----------|
| Scale of Non-Compliance   | Possible Scores | Score    |
| (a) Incident leading to justified complaint but no breach of any permit condition | 0 points        | 0        |
| (b) Incident leading to a justified complaint*                                    | 5 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                                      | 20 per incident | 0        |
| <b>Total</b>  | <b>(Max 50)</b> | <b>0</b> |

| Component 2 - Assessment of Monitoring, Maintenance and Records   |                 |    |     |           |
|---|-----------------|----|-----|-----------|
| Criterion   | Possible Scores |    |     | Score     |
|   | Yes             | No | N/A |           |
| <b>(a) All monitoring undertaken to the degree required in the permit?*</b><br><b>For dry cleaners:</b> Are loads weighed and weights recorded for all loads? Does the operator maintain a weekly inventory of solvent usage, product cleaned, and solvent waste sent of recovery or disposal?<br><b>All other sectors:</b> Are emissions and emissions monitoring recorded as required in the permit?  | 0               | 10 | 0   | 0         |
| <b>(b) Process operation modified where any problems indicated by monitoring?</b>   | 0               | 5  | 0   | 0         |
| <b>(c) Fully documented and adhered to maintenance programme, in line with permit?</b><br><b>For small waste oil burners:</b> Does the operator have records showing that each appliance has been serviced regularly in accordance with the manufacturer's instructions?<br><b>For petrol stations:</b> Has a written maintenance programme for pollution control equipment been provided to the regulator?<br><b>For vehicle refinishers, gas odourisers and mobile plant:</b> Is an appropriate maintenance schedule in place and available upon request?   | 0               | 5  | 0   | 0         |
| <b>(d) Full documented records as required in permit available on-site?</b><br><b>For small waste oil burners:</b> Are there records of servicing for a minimum of two years prior to inspection?<br><b>For petrol stations:</b> Is there a log book at the permitted premises incorporating details of all maintenance, examination and testing, inventory checking, installation and repair work carried out?<br><b>For vehicle refinishers:</b> Does the operator keep records of inspections, tests and monitoring in relation to the provisions of the permit and make them available to the regulator on request? | 0               | 5  | 0   | 0         |
| <b>(e) All relevant documents forwarded to the authority by date required?*</b><br><b>For mobile plant:</b> Has operator notified the regulator promptly of all relocations of all plant?   | -5              | 10 | 0   | -5        |
| <b>Total score</b>  | (-5 to 35)      |    |     | <b>-5</b> |

\* These aspects relate to the operator's performance within the 12 months immediately preceding the assessment or review of the assessment. Failure to monitor to the degree required or to forward documents on time more that 12 months ago should be excluded.

| Component 3 - Assessment of Management, Training and Responsibility   |                          |    |     |            |
|---|--------------------------|----|-----|------------|
| Criterion   | Possible Scores          |    |     | Score      |
|   | Yes                      | No | N/A |            |
| <p><b>(a) Documented procedures in place for implementing all aspects of the permit?</b><br/> <b>For dry cleaners:</b> Are all operating staff aware of where the operating manual for each dry cleaning machine can be found and do they have ready access to it?<br/> <b>For small waste oil burners:</b> Are clear instructions available at all times on or near the appliance detailing the correct operation and maintenance of the equipment?<br/> <b>For all other sectors:</b> 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 the air?</p>   | 0                        | 5  | 0   | 0          |
| <p><b>(b) Specific responsibilities assigned to individual staff for these procedures?</b><br/> <b>For dry cleaners:</b> Are nominated trained members of staff exclusively permitted to operate the machines<br/> <b>For small waste oil burners:</b> Are nominated members of staff exclusively permitted to operate the appliance?<br/> <b>For petrol stations:</b> Are all staff with responsibility for operating the installation trained to be aware of their responsibilities under the permit?</p>   | 0                        | 5  | 0   | 0          |
| <p><b>(c) Completion of individual responsibilities checked and recorded by the company?</b><br/> <b>For dry cleaners:</b> Are all operating staff trained in the operation of each dry cleaning machine and the control and use of dry cleaning solvents?<br/> <b>For small waste oil burners:</b> Is list of staff permitted to operate the appliance available?<br/> <b>For petrol stations, vehicle refinishers, gas odourisers and mobile plant:</b> Does the operator maintain, and make available on request, a statement of training requirements for each operational post?</p>  | 0                        | 5  | 0   | 0          |
| <p><b>(d) Documented training records for all staff with air pollution control responsibilities?</b><br/> <b>For dry cleaners:</b> Are records kept of training received by operating staff?<br/> <b>For small waste oil burners:</b> Are all nominated SWOB operating staff trained in, and conversant with, its operation? (Staff operating vapourising burners should be particularly conversant with the correct procedure for lighting from cold.)<br/> <b>For petrol stations:</b> Does the operator keep, and make available, a record of the training received by each person whose actions may have an impact on the environment?<br/> <b>For vehicle refinishers:</b> Does the operator maintain a record of staff training and instruction and make it available to the regulator on request?<br/> <b>For gas odourisers and mobile plant:</b> 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?</p> | 0                        | 5  | 0   | 0          |
| <p><b>(e) Trained staff on site throughout periods where potentially air-polluting activities take place?</b><br/> <b>For dry cleaners:</b> Are suitably trained or experienced staff on site while machines are operating?<br/> <b>Small waste oil burners:</b> Are staff nominated to operate the appliance on site while appliance is in use?<br/> <b>For petrol stations:</b> Is there a competent trained person who remains near the tanker during unloading? (Delivery drivers may be trained as the competent person.)</p>  | 0                        | 5  | 0   | 0          |
| <p>(f) Is an 'appropriate' environmental management system in place?</p>  | -5                       | 0  | 0   | 0          |
| <b>Total</b>  | (-5 to 25)               |    |     | 0          |
| <b>Total Score for Operator Performance Appraisal</b>   | <b>Range -10 to 110</b>  |    |     | <b>-5</b>  |
| <p>Regulatory Effort Category<br/> * high=score of &gt;55, medium 30 - 55 and low &lt;30</p>  | <b>Low, Medium, High</b> |    |     | <b>Low</b> |
| <p><b>Low</b> = One inspection every three years, except for vehicle refinishers and mobile plant which is two years<br/> <b>Medium</b> = One full inspection every year<br/> <b>High</b> = One full inspection, plus one check inspection every year</p>   |                          |    |     |            |