

Harlow District Council

Environmental Health Department
The Water Gardens
Harlow
Essex.
CM20 1WG



LA-PPC Inspection Report

General Information

Inspection Type	Annual
Local Authority	Harlow District Council
Site Name and Address	CPI Mortars Ltd. 29 Mead Park, River Way, Harlow, Essex. CM20 2SE
Installation Type	Mineral Drying and Cement Batching Installation
Permit Reference	EPR3/18 CPI
Site Representative	Mick Orchard
Inspection Date	09 th March 2017
Report Date	16 th March 2017
Duration of Inspection	2 hours
Review of permit conditions undertaken	Not required at this time
Regulator	Harlow Council, representative; Steven Adams

Recent History

	Comments	Action
Number of complaints received	Since the previous inspection on 5 th February 2016 there have been four justified complaints from a local company. Three emissions leading to the justified complaints were caused by repeated failures of the bag filter, which was remedied by the operator replacing the filter bags and a defective baffle plate. One complaint of dust emissions was caused by the loading of a muck away lorry within the waste bay area which has been rectified by bagged waste collection.	Observations to be recorded on startup and twice daily The plant shall not operate if filter bags serving the dryer are known to be defective.
Process/Installation changes	Fuel change	None

Future Developments

	Comments	Action
Substitute Fuel	The fully implemented propane gas in place of gas oil is improving fuel consumption.	None
Re-use of industrial waste heat	The Government has produced a report which highlights the possible potential for recovery and re-use of industrial waste heat which could be used to supply a range of energy demands, from district heating networks to electricity generation. For more information please visit: https://www.gov.uk/government/publications/the-potential-for-recovering-and-using-surplus-heat-from-industry	None

Risk Assessment

Risk Assessment Score	Medium (57)
Summary of changes	Low risk to medium risk score due to four episodes of emissions beyond the boundary leading to complaints.

Summary of Inspection

<ul style="list-style-type: none"> Four justified complaints have been received within the twelve months preceding this inspection. Undried sand spillages and dust deposits throughout the site are not cleared up promptly causing wind whipping increasing the risk of emitting beyond the site boundary.
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Actions Required

Reference to any breach of condition (or not) and other compliance issues as necessary	Condition 1. No visible particulate matter shall be emitted beyond the installation boundary.
Other relevant information	The following minimum levels of inspection will be required for the financial year 17/18 - one "full" inspection, plus one "check" inspection, together with "extra" inspections as required.

Inspection Notes

Weather Conditions	Dry with slight wind
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Unique/Abnormal Site Hazards to take into consideration.	Adjacent to an aquatic environment
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Compliance Checking

Inspection List	✓, x or N/A	Condition or observation details	Action Required
Conditions			
1. No visible emissions beyond site boundary	✓	No visual emissions during inspection.	None

<p>2. Monitoring in accordance with Table 1;</p> <p>Operator observations</p> <p>Visible emissions</p> <p>Droplets, fume and smoke</p> <p>Sand conveyors</p>	<p>✓</p> <p>✓</p> <p>×</p> <p>✓</p>	<p>Daily log sheet records requiring once a day monitoring up to date.</p> <p>Records show only once a day monitoring.</p> <p>Daily log sheet records requiring once a day monitoring up to date</p>	<p>None</p> <p>Observations to be recorded on startup and twice daily</p> <p>None</p>
<p>Particulate matter <50mg</p>	<p>✓</p>	<p>Extractive Monitoring Carried out on 17th October 2016 reported emissions 4.5g/m³</p>	<p>None</p>
<p>Sulphur <0.1% records</p>	<p>×</p>	<p>Not available at the time of inspection.</p>	<p>Please forward the latest copy of your sampling of Sulphur contents in fuel.</p>
<p>3. Plant maintained and calibrated in accordance with manufacturer's instructions.</p>	<p>✓</p>	<p>Weekly, monthly and 6 monthly maintenance schedule records up to date.</p>	<p>None</p>
<p>4. Monthly filter bag Inspection</p>	<p>✓</p>	<p>Recorded every 7 days</p>	<p>The defective baffle plate shortening the life of the filter bags has been replaced.</p>
<p>5. Fine powdered materials only stored in silos?</p>	<p>✓</p>	<p>Satisfactory</p>	<p>None</p>
<p>6. Correct procedure in place for tanker loading and unloading of cement? Loading rate, connections, displaced air back-vented via filtration system. Records?</p>	<p>✓</p>	<p>Written procedures confirming delivery drivers fully trained, bulk delivery log sheet recording checks at start to finish and one intermediate time.</p>	<p>None</p>
<p>7. Silos not overfilled – overfilling alarm checked?</p>	<p>✓</p>	<p>Silo safety check carried out weekly</p>	<p>None</p>
<p>8. Displaced air from pneumatic transfer shall pass through abatement prior to emission to air</p>	<p>✓</p>	<p>Satisfactory</p>	<p>None</p>
<p>9. Pressure relief valve checks</p>	<p>✓</p>	<p>Checked and recorded every 7 days</p>	<p>None</p>
<p>10. Undried sand stored in suitable storage bays or discharged directly into hoppers</p>	<p>×</p>	<p>Undried sand spillage out of the storage bay into vehicle paths.</p>	<p>Management techniques should be improved to minimise dust emissions as necessary.</p>

11. Dusty waste materials stored in suitable 3 sided storage bays? Suppression management techniques employed to minimize dust emissions?	✓	Waste now stored within the 3 sided bay in jumbo polypropylene bags.	None
12. Unused stock bays. Suppression management techniques employed to minimize dust emissions?	✓	No unused stock bays	None
13. Un-dried sand conveyed using fully enclosed conveyor. All transfer points have wind protection and spillages removed promptly	×	The area beneath the conveyor is built up with sand spillages that appear to have been there for some time.	The area beneath the un-dried sand conveyor shall be inspected in accordance with table 1 and all spilled material removed promptly.
14. Vehicles carrying dusty products fully enclosed/sheeted when arriving/leaving site?	✓	Open back vehicles fully sheeted at time of inspection.	None
15. Onsite roadways? Consolidated surface? In good repair and kept clean?	×	Find dust seen wind whipping on site during inspection.	Management techniques should be improved to minimise dust emissions as necessary.
16. Vehicles shall not track material from site onto the highway.	×	Vehicles are tracking fine dust onto the highway due to spilled out materials from the storage bays.	Vehicles shall not track materials from site onto the highway. See above.
17. Building maintained so as to prevent visible dust emissions	✓	Building maintained to satisfaction.	Fine dust can be prevented from leaving the production hall by keeping the doors closed when not in use.
18. Test and monitoring records available?	✓	The environmental recording system appears to be comprehensive and largely up to date.	None
19. Staff training records?	✓	In house procedures covering all staff	None
20 BAT?	✓	Yes	None
21 Changes notified?	✓	No proposed changes scheduled.	None

1 - Inherent Environmental Impact Potential

Risk Rating	Score
Category 2 PG3	20

2 - Progress with Upgrading

Status of Upgrading	Score
None outstanding	0

3 - Sensitivity and Proximity of Receptors

Proximity to Emission Source	Score
Medium sensitivity receptor <100 metres x2 for cement process	12

4 - Other Targets

Proximity to Emission Source	Score
No air pollution problems in the local area to which process is a potential contributor	0

5 - Compliance Assessment

Scale of Non-Compliance	Possible Score	Score Awarded
Incident leading to justified complaint but no breach of any specific authorisation condition or of the general/residual BATNEEC condition	0	0
Incident leading to a justified complaint	5 per incident	10
Minor breach of authorisation not leading to formal action	10 per incident	20
Incident leading to formal caution, Enforcement Notice or prosecution	15 per incident	0
Incident leading to a Prohibition Notice	20 per incident	0
Total (Max. 50)		30

6 - Assessment of Monitoring, Maintenance and Records

Criterion	Score
All monitoring undertaken to the degree required in the authorisation?	0
Monitoring requirements reduced because results over time show consistent compliance?	0
Process operation modified where any problems indicated by monitoring?	0
Fully documented and adhered to maintenance programme, in line with authorisation?	0
Full documented records as required in authorisation available on-site?	0
All relevant documents forwarded to the authority by date required?	0
Total score	0

7 - Assessment of Management, Training and Responsibility

Criterion	Score
Documented procedures in place for implementing all aspects of the authorisation?	0
Specific responsibilities assigned to individual staff for these procedures?	0
Completion of individual responsibilities checked and recorded by the company?	0
Documented training records for all staff with air pollution control responsibilities?	0
Trained staff on site throughout periods where potentially air-polluting activities take place?	0
Is an 'appropriate' environmental management system in place?	-5
Total	-5

8 - Determination of regulatory effort from scores

Actual score = 57	40 to 80	Category = Medium
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CPI Mortars Ltd
Willow House
Strathclyde Business Park
Bellshill
Lanarkshire
ML4 3PB

Harlow Council
Civic Centre
The Water Gardens
Harlow
Essex CM20 1WG
www.harlow.gov.uk

Our Ref: SA/16/02052
Your Ref:
Date: 16/03/17

Environmental Permitting (England and Wales) Regulations 2010
CPI Mortars Ltd, 29 Mead Industrial Park, Riverway, Harlow, Essex, CM20 2SE

Dear Sir or Madam

As part of our permit compliance inspection program I wish to confirm my visit on the 9th March 2017 to the above premises.

I would like to take this opportunity to thank Mick Orchard for his assistance during the inspection.

Please find enclosed an inspection report for the above installation.

Please do not hesitate to contact me should you wish to discuss this matter.

Yours faithfully



Steven Adams

Senior Environmental Health Officer
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