

## Harlow District Council

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



### LA-PPC Inspection Report

#### General Information

Inspection Type	Full
Local Authority	Harlow District Council
Site Name and Address	Ronacrete Ltd, Ronac House, Flex Meadow, Harlow, CM19 5TD
Installation Type	PG 3/01(12) Blending, Packing, Loading, Unloading and Use of Bulk Cement
Permit Reference	EPR/3.01/Ronacrete
Site Representative Seen	David McEwan & David Saunders
Inspection Date	5 <sup>th</sup> July 2016
Report Date	13 <sup>th</sup> July 2016
Duration of Inspection	1 hour
Permit condition review	Simplified permit issued 2013
Regulator	Harlow Council, representative; Steven Adams

#### Recent History

	Comments	Action
Number of complaints received	None	None
Process/Installation changes	None	None

#### Future Developments

	Comments	Action
Relevant information	None	None

## Risk Assessment

<b>Risk Assessment Score</b>	30 (medium)
<b>Summary of changes</b>	Assessment moved from low to medium

## Summary of Inspection

Maintenance procedures and operations could not be fully established from records kept on site.  
Staff training records were not available on site.

## Actions Required

<b>Reference to any breach of condition (or not) and other compliance issues as necessary</b>	<p>Condition 3. All plant and equipment capable of causing, or preventing, emissions and all monitoring devices shall be calibrated and maintained in accordance with the manufacturer's instructions. Records shall be kept of such maintenance and made available on request. All silo pressure relief valves shall be inspected in accordance with the manufacturer's instructions or, every month whichever is the earliest.</p> <p>Condition 13. Staff at all levels shall receive the necessary training and instruction to enable them to comply with the conditions of this permit. Records shall be kept of relevant training undertaken and be made available on request of the regulator.</p>
<b>Other relevant information</b>	None

## Inspection Notes

<b>Weather Conditions</b>	Dry
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<b>Unique/Abnormal Site Hazards to take into consideration.</b>	None
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## Compliance Checking

Inspection List	✓, x or N/A	Observation	Action Required
No visible emissions beyond site boundary	✓	No visual emissions during visit	None
Monitoring in accordance with Table 1. Visible emissions Operator observations	✓	Daily log sheet records requiring monitoring up to date.	None

<p><b>Plant maintained in accordance with manufacturer's instructions.</b></p>	<p>x</p>	<p>Maintenance of air handling and local exhaust ventilation systems and filters carried out 13/04/2016.</p> <p>No maintenance records available for the silos, PRV's, Screw feeder and gear box, Tote bin tumbler ect.</p>	<p>Effective preventative maintenance plays a key part in achieving compliance with emission limits and other provisions. All aspects of the process including all plant, buildings and the equipment concerned with the control of emissions to air should be properly maintained. In particular:</p> <ul style="list-style-type: none"> <li>• The operator should have the following available for inspection by the regulator:</li> <li>• a written maintenance programme for all pollution control equipment; <b>and</b></li> <li>• a record of maintenance that has been undertaken.</li> </ul>
<p><b>Staff training records made available?</b></p>	<p>x</p>	<p>No written record of staff training available.</p>	<p>Staff at all levels need the necessary training and instruction in their duties relating to control of the process and emissions to air. In order to minimise risk of emissions, particular emphasis should be given to control procedures during start-up, shut down and abnormal conditions.</p>
<p><b>Loading/unloading tanker procedure. Dust emissions minimised?</b></p>	<p>✓</p>	<p>Ullage is checked before the load is accepted. Load cells are checked. All deliveries are attended. All tankers are back vented. Unloading is carried out in accordance to an agreed procedure.</p>	<p>None</p>
<p><b>Silo pressure relief valves?</b></p>	<p>✓</p>	<p>Internal checks recorded monthly</p>	<p>None</p>
<p><b>Bulk cement store within silos only?</b></p>	<p>✓</p>	<p>Bulk cement is stored only in silos prior to mixing and bagging operations.</p>	<p>None</p>
<p><b>Silos not overfilled – overfilling alarm checked? Silo filling procedures</b></p>	<p>N/A</p>	<p>High level alarms and automatic cut out systems are not fitted to the silos as agreed during the latest permit review.</p>	<p>High level alarms would assist your silo management practices and reduce the likelihood of overfilling.</p>
<p><b>Displaced air from pneumatic</b></p>	<p>✓</p>	<p>Yes</p>	<p>None</p>

<b>transfer shall pass through abatement plant prior to emissions to air.</b>			
<b>Dusty waste materials sealed in polythene bags and placed in a skip?</b>	✓	Bagged and stored in a controlled area.	None
<b>Vehicles carrying bagged waste &amp; products only or in closed containers?</b>	✓	Yes	None
<b>Onsite roadways consolidated surfaces kept clean and in good repair?</b>	✓	All consolidated and well maintained.	None
<b>Process building maintained so as to prevent visible dust emissions?</b>	✓	The process is fully enclosed and maintained in good condition.	None
<b>Site house keeping</b>	✓	Satisfactory	None

End

**LAPPC Operator Performance Appraisal**

**Ronacrete, Flex Meadow, Harlow, Essex. CM19 5TD** **Date: 12 July 2016**

<b>Table A: Compliance Assessment</b>		
<b>Scale of Non-Compliance (per Incident)</b>	<b>Yes</b>	<b>No</b>
(A) Incident leading to justified complaint but no breach of any permit condition	0	0
(B) Incident leading to a justified complaint *	5	0
(C) Breach of permit not leading to formal action	<b>20</b>	0
(D) Incident leading to formal caution, Enforcement Notice or prosecution	15	0
(E) Incident leading to a Prohibition Notice or Suspension Notice	20	0
<b>Total (0 to 50)</b>	<b>20</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>Table B: Assessment of Monitoring, Maintenance and Records</b>			
<b>Criterion</b>	<b>Possible Scores</b>		
	<b>Yes</b>	<b>No</b>	<b>N/A</b>
(A) Are emissions monitored as required in the permit?* Are emissions and emissions monitoring recorded as required in the permit?	0	10	0
(B) Process operation modified where any problems indicated by monitoring?	0	5	0
(C) Is an appropriate maintenance schedule in place and available on request?	0	5	0
(D) 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
(E) All relevant documents forwarded to the authority by date required?*	-5	10	0
<b>Total (-5 to 35)</b>	<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 than twelve months ago should be excluded.*

<b>Table C: Assessment of Management, Training and Responsibility</b>			
<b>Criterion</b>	<b>Possible Scores</b>		
	<b>Yes</b>	<b>No</b>	<b>N/A</b>
(A) Are procedures in place to ensure proper management, supervision and training for process operators, proper use of equipment and effective preventative maintenance on all plant and equipment concerned with the control of emissions to air?	0	5	0
(B) Specific responsibilities assigned to individual staff for these procedures?	0	5	0
(C) Does the operator maintain, and make available on request, a statement of training requirements for each operational post?	0	5	0
(D) Does the operator maintain a record of staff training and instruction and make it available to the regulator on request?	0	5	0
(E) Trained staff on site throughout periods where potentially air-polluting activities take place?	0	5	0
(F) Is an 'appropriate' environmental management system in place and working effectively?	0	5	0
	<b>5</b>		

<b>Determination of Regulatory Effort from Scores</b>		
Actual score = 30	Score band = 30 to 55	Category = <b>Medium</b>