

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	Tarmac Trading Limited, Station Approach, Harlow Mill, Harlow, CM20 2EL
Installation Type	PH3/15 (12) Road Stone Coating
Permit Reference	EPR/3.15/V5/Tarmac
Site Representative	Paul White & Iain Blackaller
Inspection Date	12 th July 2016
Report Date	19 th July 2016
Duration of Inspection	2 Hours
Review of permit conditions undertaken	New permit issued February 2016
Regulator	Harlow Council, representative; Steven Adams

Recent History

	Comments	Action
Number of complaints received	3 complaints alleging excess odour and noise however no further evidence received.	None
Process/Installation changes	Covered storage bays for fine dust now fully operational	None

Future Developments

	Comments	Action
Onsite roadways	Proposals for improved land drainage and resurfacing	Please provide a start date for proposed works.

Risk Assessment

Risk Assessment Score	60 (High)
Summary of changes	Simplified Mineral Activities Risk Assessment (Operator Performance Appraisal) now in place.

Summary of Inspection

There are ongoing improvements that have drastically improved emissions of particulate matter and odour, resulting in a reduction of complaints. Further improvements are required to improve the dust and suppression systems.

Actions Required

Reference to any breach of condition (or not) and other compliance issues as necessary	<p>2. The emission requirements, methods and frequency of monitoring set out in Table 1 shall be complied with. Sampling shall be representative. The results of all periodic monitoring shall be sent to the Regulator with 4 weeks of the monitoring being carried out.</p> <p>Extractive stack monitoring results must be sent to the regulator within 4 weeks.</p> <p>Observations of droplets, mist, fumes & smoke must be recorded on startup and twice more daily.</p> <p>15. All dusty materials shall be conveyed by enclosed conveyors and fully enclosed bucket lift. These material transport systems shall be examined regularly and maintained in serviceable condition to inhibit dust emissions.</p> <p>Review dust management and suppression of fine materials on the conveyor.</p> <p>17. All areas where there is regular movement of vehicles shall have a consolidated surface capable of being cleaned. These surfaces shall be kept clean and in good repair</p> <p>Provide adequate drainage and keep surface clean and in good repair.</p> <p>18. Vehicles shall not track material from the site onto the highway.</p> <p>Improve water management (dust suppression, wheel wash).</p> <p>19. The fabric of process buildings shall be maintained in good condition. Doors shall be kept closed when not in use.</p> <p>Improve the sealing arrangement around the top of the plant tower.</p>
Other relevant information	None

Inspection Notes

Weather Conditions	Clear & dry, very low wind speed
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Unique/Abnormal Site Hazards to take into consideration.	None
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emission to air			
Pressure relief valve checks	✓	Pressure relief valves are checked monthly.	None
Dusty materials including waste stored in suitable 3 sided storage bays? Suppression management techniques employed to minimise dust emissions?	✓	Yes	None
Sand and fine aggregates under 3mm stored in 3 sided bay with a roof	✓	Yes	None
All dusty materials conveyed using fully enclosed conveyor and fully enclosed bucket lift.	×	Significant airborne dust was emitting from the conveyor transfer point.	Please investigate the cause of these emissions and undertake remedial measure to prevent further emissions. Please advise when this is resolved and provide details of corrective action.
Vehicles carrying dusty products fully enclosed/sheeted when arriving/leaving site?	✓	Yes	None
Onsite roadways? Consolidated surface? In good repair and kept clean?	×	The current consolidate surface is in poor repair, inadequate drainage and not capable of being cleaned resulting in tracked material transferred to the highway.	Roadways in normal use and any other area where there is regular movement of vehicles should have a hard surface capable of being cleaned or kept wet. They should be kept clean or wet, in order to prevent or minimise dust emissions. They should be adequately drained to avoid ponding of water. They should be kept in good repair.
Vehicles shall not track material from site onto the highway.	×	There is dust material being transferred from the site to the highway.	To prevent visible dust being carried off site, wheel cleaning facilities should be provided and used by vehicles before leaving the site.
Building maintained in good condition so as to prevent visible dust emissions	×	Emissions were seen at the time of inspection from the bucket lift panels close to the top of the plant tower.	Please investigate the cause of these emissions and undertake remedial measure to prevent further emissions. Please advise when this is resolved and

			provide details of corrective action.
Test and monitoring records available?	✓	Yes	None
Staff training records?	✓	A training matrix is held electronically. Training of on-site personnel is ongoing. Staff turnover is low.	None
Housekeeping and spillage management	×	There are areas around the plant with significant spillages accumulations of spilt dust and tarmac.	Spillages should be regularly removed by a cleaning operation.

End

LAPPC Operator Performance Appraisal

Tarmac Trading Limited, Station Approach, Harlow Mill, Harlow, CM20 2EL

Date: 12 July 2016

Table A: Compliance Assessment

Scale of Non-Compliance (per Incident)	Yes	No
(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	10	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
Total (0 to 50)	40	

* 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.

Table B: Assessment of Monitoring, Maintenance and Records

Criterion	Possible Scores		
	Yes	No	N/A
(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
Total (-5 to 35)		20	

* 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.

Table C: Assessment of Management, Training and Responsibility

Criterion	Possible Scores		
	Yes	No	N/A
(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

Determination of Regulatory Effort from Scores

Actual score = 60	Score band = Over 55	Category = High
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