

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	Plant Manager
Inspection Date	20 March 2019
Report Date	25 March 2019
Duration of Inspection	2 hours
Review of permit conditions undertaken	Not required at this time
Regulator	Harlow Council representative

Recent History

	Comments	Action
Number of complaints received	Four complaints of dust emissions	Discussed with the site managers during a visit on 10/12/2018
Process/Installation changes	Water suppression for dust to be installed	Please contact me when completed.

Future Developments

	Comments	Action
Information relating to EPR	Operating under Process Guidance Notes 3/18(12) and 3/01(12)	For information

Other relevant information	The Council's Authorised Process public register now online http://www.harlow.gov.uk/environmental-public-register	For information
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Risk Assessment

Risk Assessment Score	Medium
Summary of changes	Low risk to medium risk due to breaches of permit conditions during the 2018/19 regulatory period.

Summary of Inspection

<ul style="list-style-type: none"> On-going improvements to control dust emissions being made
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Actions Required

Reference to any breach of condition (or not) and other compliance issues as necessary	16/11/18 & 19/11/18 Particular matter seen beyond the east & south boundary points 16/11/18 & 19/11/18 Spilled materials from a conveyor transfer point not removed promptly. 16/11/18 & 19/11/18 Vehicles tracking material from site. 16/11/18 & 19/11/18 A door on the southern elevation kept open for no apparent reason allowing dust emissions.
Other relevant information	None

Inspection Notes

Weather Conditions	Thick cloud, gentle breeze
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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	✓	Clear plume of steam witnessed	None
2. Monitoring in accordance with Table 1;			
Operator observations	✓	Daily log sheet records requiring once a day monitoring up to date.	None
Visible emissions	✓		
Droplets, fume and smoke	x	Records show only once a day monitoring.	Observations to be recorded on startup and twice daily

Sand conveyors	✓	Daily log sheet records requiring once a day monitoring up to date	None
Particulate matter <50mg	✓	Extractive Monitoring Carried out on 10 th July 2018 reported emissions 8.1 mg/m ³	None
Sulphur <0.1% records	✓	Ultra35 Certificate of Quality Sulphur content 0.045%	Ultra35 oil only used once a month
3. Plant maintained and calibrated in accordance with manufacturer's instructions.	✓	Weekly, fortnightly, monthly and 6 monthly maintenance schedule records up to date. Annual service by specialist company dated 10/09/2018	None
4. Monthly filter bag Inspection	✓	Visual checks recorded every 7 days, physical check recorded monthly.	None
5. Fine powdered materials only stored in silos?	✓	Satisfactory	None
6. Correct procedure in place for tanker loading and unloading of cement? Loading rate, connections, displaced air back-vented via filtration system. Records?	✓	Written procedures confirming delivery drivers fully trained, bulk delivery log sheet recording checks at start to finish and one intermediate time.	None
7. Silos not overfilled – overfilling alarm checked?	✓	Silo safety check carried out weekly	None
8. Displaced air from pneumatic transfer shall pass through abatement prior to emission to air	✓	Satisfactory procedure in place	None
9. Pressure relief valve checks	✓	Checked and recorded every 7 days	None
10. Undried sand stored in suitable storage bays or discharged directly into hoppers	✓	Improved spillage control in place	None

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 awaiting collection.	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	✓	Improved spillage control in place.	None
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?	x	Improvement to general housekeeping on-going, awaiting the installation of water sprinklers to suppress dust	Please contact me when water sprinklers in place
16. Vehicles shall not track material from site onto the highway.	x	Daily road sweeping ongoing, awaiting the installation of water sprinklers to keep dust emissions from vehicles	Please contact me when water sprinklers in place
17. Building maintained so as to prevent visible dust emissions	✓	Building maintained to satisfaction.	None
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	Recommend additional training in dust control by all staff
20 BAT?	✓	Yes	None

21 Changes notified?	✓	No proposed changes scheduled.	None
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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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