

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	HL Display Harlow Limited, Horsecroft Road, Harlow, Essex. CM19 5BH
Installation Type	Powder Coating Process, jig cleaning and phosphate pre-treatment
Permit Reference	EPR/B/6.4/a/HL
Site Representative Seen	Mansoor Raza
Inspection Date	23 rd November 2015
Report date	26 th November 2015
Duration of Inspection	60 Minutes
Review of permit conditions undertaken	Not required
Regulator	Harlow Council, Steven Adams

Recent History

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

Future Developments

	Comments	Action
Information relating to PPC	None	None
Other relevant information		

Risk Assessment

Risk Assessment Score	15
Summary of changes to score	No Change

Summary of Inspection

Installation managed to a high standard

Actions Required

Reference to any breach of condition (or not) and other compliance issues as necessary	Please forward a copy of your waste transfer record to steven.adams@harlow.gov.uk
Other relevant information	None

Inspection Notes

Weather Conditions	Dry and fine
Unique/Abnormal Site Hazards to take into consideration.	None

Compliance Checking

Inspection List	✓, ✗ or N/A	Condition of observation details	Action Required
Logbooks and Records			
Weekly and annual powder usage inventories.	✓	Annual accounts	None
Training records Awareness of permit conditions Dealing with conditions likely to lead to release of powder	✓	Individual training records are maintained for operators.	None
Powder coating equipment maintenance <i>in accordance with manufacturer's instructions</i>	✓	All spray equipment maintained by Nordson (equipment manufacturers) on annual contract. All burners maintained by Three Spires Maintenance records received	None
Internal extraction filter maintenance schedule	✓	Filters are changed at 3 year intervals. Scheduled for change next month	None
Machine operating manual on site	✓	Guidance available to staff. Staff are familiar with the equipment and competent to deal with breakdowns.	None
Copy of the permit on site	✓	In office	None

Records of any abnormal emissions, breakdowns or malfunctions	✓	No significant releases have been recorded.	None
Spare filters available	✓	Available on site.	None
Site			
Powder storage	✓	In manufacturers packaging within the process building.	None
Powder coating operation <i>All coating carried out in purpose designed spraybooths</i>	✓	In automatic and stand-alone booths.	None
Spray equipment <i>Powder coating carried out using high transfer electrostatic equipment</i>	✓	Nordson system with high capture capability.	None
Spray emissions captured within spraybooth	✓	No significant spillage occurs when using the equipment.	None
Temperature of powder coating oven <i>continuously monitored 210°C or below</i>	✓	Monitored by operator and maintained below 210°C or below 188°C at time of visit	None
Storage of waste materials	✓	Bagged and boxed in original packaging. Removed by specialist contractor	
Procedure for dealing with spillages	✓	Staff are competent, trained and capable of dealing with spillages.	None
House keeping	✓	Excellent	None
Operational Changes			
Changes to stack height	✓	None	None
Other	✓	Considering changing to Gas Infrared Ovens.	Please notify the council of any changes to the heat source
Monitoring Emissions and Management Procedures			
Visual and olfactory assessments	✓	Daily observations recorded.	None

Non continuous monitoring	✓	Not required	None
Documented procedure for abnormal emissions	✓	Written procedures for a range of malfunctions and occurrences	None
Adverse monitoring results recorded and regulator notified	✓	No adverse observations during period under review	None

End

1 - Inherent Environmental Impact Potential

Risk Rating	Score
Category 1 activity	10

2 - Progress with Upgrading

Status of Upgrading	Score
Upgrading not complete. Plates, caps and cowls over process chimneys.	0

3 - Sensitivity and Proximity of Receptors

Proximity to Emission Source	Score
Low sensitivity receptors within 100m of the activity	5

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 BAT condition	0	0
Incident leading to a justified complaint	5 per incident	0
Minor breach of permit not leading to formal action	10 per incident	0
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)		0

6 - Assessment of Monitoring, Maintenance and Records

Criterion	Score
All monitoring undertaken to the degree required in the permit?	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 permit?	0
Full documented records as required in permit 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 permit?	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?	0
Total	0

8 - Determination of Regulatory Effort from Scores

Actual score = 15	Over <40	Category = Low
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