

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	27 th February 2018
Report date	1 st February 2018
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	Process Guidance Note 6/31(13) issues December 2013	None
Other relevant information	The Council's Authorised Process public register now online http://www.harlow.gov.uk/environmental-public-register	None

Risk Assessment

Risk Assessment Score	0
Summary of changes to score	Changed to a reduced fee activities risk assessment

Summary of Inspection

The process is managed to a high standard.

Actions Required

Reference to any breach of condition (or not) and other compliance issues as necessary	None
Other relevant information	None

Inspection Notes

Weather Conditions	Clear
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			
Visual and olfactory assessments	✓	Daily observations recorded in logbook	None
Adverse monitoring results recorded and regulator notified	✓	No adverse observations during period under review	None
Training records Awareness of permit conditions Dealing with conditions likely to lead to release of powder	✓	Individual training records are maintained for operators. Powder release incorporated into COSHH H&S training	None
Powder coating equipment maintenance <i>in accordance with manufacturer's instructions</i>	✓	All spray equipment maintained by Nordson (equipment manufacturers) on annual contract, carried out on 12/02/2018 All burners maintained by Three Spires, carried out on 24.02.2018	None
Internal extraction filter maintenance schedule	✓	Filters are changed at 3 year intervals. Changed by Nordson 2017	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	None
Storage of waste materials	✓	Bagged and boxed in original packaging. Removed by specialist contractor	None
Procedure for dealing with spillages	✓	Staff are competent, trained and capable of dealing with spillages.	None
House keeping	✓	Excellent	None
Operational Changes	None		
Monitoring Emissions and Management Procedures			
Non continuous monitoring	✓	Not required	None
Documented procedure for abnormal emissions	✓	Written procedures for a range of malfunctions and occurrences	None

End

1 - Compliance Assessment

Scoring for Compliance Assessment

Scale of Non-Compliance	Possible Score	Score Awarded
(A) Incident leading to justified complaint but no breach of any specific permit condition or of the general/residual BAT condition.	10 points	0
(B) Incident leading to a justified complaint*.	5 points per incident	0
(C) Breach of permit not leading to formal action.	10 points per breach	0
(D) Incident leading to formal caution, Enforcement Notice or prosecution.	15 points per incident	0
(E) Incident leading to a Prohibition Notice or Suspension Notice.	20 points per incident	0
Total (Max. 50):		0

* 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.

2 - Assessment of Monitoring, Maintenance and Records

Scoring for Assessment of Monitoring, Maintenance and Records

Criterion	Possible Score			Score Awarded
	Yes	No	N/A	
(A) Are emissions and emissions monitoring recorded as required in the permit?	0	10	0	0
(B) Process operation modified where any problems indicated by monitoring?	0	5	0	0
(C) Is an appropriate maintenance schedule in place and available on request?	0	5	0	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	0
(E) All relevant documents forwarded to the authority by date required?	-5	10	0	0
Total:				0

These aspects relate to the operator's performance within the twelve 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.

3 - Assessment of Management, Training and Responsibility

Scoring for Assessment of Management, Training and Responsibility

Criterion	Possible Score			Score Awarded
	Yes	No	N/A	
(A) Are procedures in place to ensure proper management, supervision and training for process operations, proper use of equipment and effective preventative maintenance on all plant and equipment concerned with the control of emissions to the air?	0	5	0	0
(B) Specific responsibilities assigned to individual staff for these procedures?	0	0	0	0
(C) Does the operator maintain, and make available on request, a statement of training requirements for each operational post?	0	5	0	5
(D) Does the Operator maintain a record of staff training and instruction and make it available to the Regulator on request?	0	5	0	5
(E) Trained staff on site throughout periods where potentially polluting activities take place?	0	5	0	0
(F) Is an 'appropriate' environmental management system in place and working effectively?	9	0	0	0
Total:				0

4 - Determination of Regulatory Effort from Scores

Actual score = 0	Score band = <30	Category = Low
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