

LA-PPC Inspection Report

General Information

Inspection Type	Full Annual
Regulator/ Local Authority	Harlow District Council:
Site Name and Address	Nationwide DWS Harlow, River Way, Harlow, Essex. CM20 2ES
Installation Type	Vehicle Refinishing Process
Permit Reference	EPR/B/6.4/NARS
Site Representative Seen	Health & Safety Business Partner
Regulator/representative	Harlow Council: SEHO
Inspection Date	13/06/2019
Duration of Inspection	60 minutes
Report date	14/06/2019
Review of permit conditions undertaken	2017

Recent History

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

Future Developments

	Comments	Action
Information relating to EPR	Operating under Process Guidance Notes 6/34(11)	For information
Other relevant information	The Council's Authorised Process public register is now online http://www.harlow.gov.uk/environmental-public-register	For information

Risk Assessment

Risk Assessment Score	10
Summary of changes	Risk score lowered due to staff training improvements.

Summary of Inspection

Site housekeeping is managed to a good standard. On-going improvements to staff training are being made.

Reference to any breach of condition (or not) and other compliance issues as necessary	Some records are not being maintained; see below.
Other relevant information	None

Inspection Notes

Weather Conditions	Rain and moderate breeze
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Unique/Abnormal Site Hazards to take into consideration.	The installation is close to the river.
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Compliance Checking

Inspection List	✓, x or N/A	Observation details	Action Required
Best Available Techniques	✓	Satisfactory facilities and techniques	None
Visual & Odorous Emissions monitoring <i>Releases to air free from visible emissions?</i> <i>Emissions to air free from droplets?</i> <i>No offensive odour beyond site boundary?</i>	✓	No visible & odour emissions during visit.	None
Logbooks and Records <i>Particulate matter/local exhausts ventilation, controls and maintenance.</i>	x	Your internal monitoring activity procedures appear satisfactory however the last electronic record was dated 29 th April 2019.	Please ensure that records of all environmental checks that are undertaken and which may have an effect on emissions are recorded and made available for inspection.
Particulate matter/local exhaust ventilation, controls and maintenance.	✓	All equipment regularly maintained and documented. Annual service 3 rd June 2019.	None
Compliant coatings and VOC purchase analysis	✓	Monthly records maintained. Compliant coatings used. Annual solvent usage >1 tonne	None
Records of breakdowns, spillages or other incidents leading to abnormal emissions	✓	No significant issues reported.	None
Waste paint and solvent collection arrangements	✓	Via licensed waste carrier for reprocessing/disposal. Only one receipt made available for 2019.	Copies of receipts of waste materials removed from site shall be kept for three years.
Staff training and records	✓	A new training program covering permit conditions is held electronically. Training of on-site personnel is ongoing.	Please make all training records available at the next inspection.

Paint and solvent storage	✓	In lidded containers within purpose designed paint shop. Containers appeared to be in satisfactory condition.	None
Spray gun cleaning	✓	Fully enclosed procedure	None
Paint application techniques	✓	HVLP spray guns	None
Paint application location	✓	Entirely within spray-booths	None
Stack height and dispersion	✓	No changes	None
Storage of waste paint and solvent	✓	In sealed containers within metal cabinet	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	10
(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:				10

¹ 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	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	0
(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 = 10	Score band = <30	Category = Low
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