

### LA-PPC Inspection Report

#### General Information

<b>Inspection Type</b>	Full Annual
<b>Regulator/ Local Authority</b>	Harlow District Council:
<b>Site Name and Address</b>	Alexander Dennis, Unit B, Barrows Road, Harlow, CM19 5FD
<b>Installation Type</b>	Vehicle Refinishing Process
<b>Permit Reference</b>	EPR/6.4/18/V1/AD
<b>Site Representative Seen</b>	
<b>Inspection Date</b>	27/02/2019
<b>Duration of Inspection</b>	90 minutes
<b>Report date</b>	04/03/2019
<b>Review of permit conditions undertaken</b>	Permit issued July 2018

#### Recent History

	Comments	Action
<b>Number of complaints received</b>	None	None
<b>Process/Installation changes</b>	Proposing to replace spray gun cleaning equipment	None

#### Future Developments

	Comments	Action
<b>Information relating to PPC and breaches of permit conditions</b>	Process Guidance Note 6/34(11) issued July 2013	For information
<b>Other relevant information</b>	The Council's Authorised Process public register is now online <a href="http://www.harlow.gov.uk/environmental-public-register">http://www.harlow.gov.uk/environmental-public-register</a>	For information

#### Risk Assessment

<b>Risk Assessment Score</b>	30 (Medium)
<b>Summary of changes</b>	1 <sup>st</sup> risk assessment

#### Summary of Inspection

A new installation operating to a good standard however improvements required for staff training and record keeping.

<b>Reference to any breach of condition (or not) and other compliance issues as necessary</b>	Condition 35. A record of staff training and instruction shall be maintained by the Operator and shall be available to the Regulator on request.
<b>Other relevant information</b>	None

### Inspection Notes

<b>Weather Conditions</b>	Cloudy with a gentle breeze
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<b>Unique/Abnormal Site Hazards to take into consideration.</b>	None
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### Compliance Checking

<b>Inspection List</b>	<b>✓, x or N/A</b>	<b>Observation details</b>	<b>Action Required</b>
Visual & Odorous Emissions monitoring	✓	No visible smoke, odour and droplet emissions witnessed during the inspection.	Please record all regular monitoring with time, date and result in a logbook which can be made available for inspection on request.
Logbooks and Records <i>Particulate matter/local exhausts ventilation, controls and maintenance.</i>	✓	Haltec installed the spray booth and make regular visits to ensure its complaint operation.  Servicing of the dust extraction system and paint cleaner due later this year.	Please record all servicing records in a logbook which can be made available for inspection on request.
Record of paint of paints and organic solvents?	x	No record of paint purchases during inspection.	Please a send six monthly figure for total organic solvent usage received.
Licensed waste carrier used? Receipts?	✓	Licensed waste carrier used for reprocessing/disposal, all records held electronically.	None
Records of breakdowns, spillages or other incidents leading to abnormal emissions	✓	No reported incidents, spares held on-site.	Please record all incidents in a logbook which can be made available for inspection on request.
Staff training and records	x	There is no record of training and instruction covering the permit conditions and the need to minimise VOC and dust emissions.	All staff whose functions could impact on air emissions from the activity should receive appropriate training on those functions. This should include: <ul style="list-style-type: none"> <li>• awareness of their responsibilities under the permit;</li> <li>• steps that are necessary to minimise emissions during start-up and shutdown;</li> <li>• actions to take when there are abnormal conditions, or accidents or spillages that could, if not controlled, result in</li> </ul>

			emissions. Training records for each post should be recorded and made available for inspection on request.
Paint and solvent storage	✓	In lidded containers within purpose designed paint room.	None
Compliant coatings used?	✓	Compliant	None
Storage of waste paint and solvent	✓	Stored in labelled sealed tight drums within a spillage collector.	None
Solvent wipes placed in suitable container?	✓	Lidded container	Non-flammable, heat resistant container recommended
Dusty waste storage	✓	Satisfactory	None
Storage of filter bag dust Secure?	✓	Immediately wrapped in plastic for waste collection	None
Paint application techniques	✓	HVLP spray guns	None
Spray gun cleaning	✓	Fully enclosed procedure	None
Paint application location	✓	Fully enclosed spray booth	None
Sanding only when dust extraction used	✓	Compliant	None
Stack height and dispersion	✓	No change	None
General housekeeping	✓	Very high standard	None
Best Available Techniques	✓	New installation meeting BAT	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	10
(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
<b>Total (Max. 50):</b>		<b>10</b>

\* 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
<b>Total:</b>				<b>0</b>

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	5
(B) Specific responsibilities assigned to individual staff for these procedures?	0	5	0	5
(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
<b>Total:</b>				<b>20</b>

**4 - Determination of Regulatory Effort from Scores**

Actual score = 30	Score band = 30-55	Category = Medium
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