

Risk Assessment Method for Local Air Pollution Control

Score Sheet

Name of authorised process/installation	BAE Systems Maritime - Submarines
Name of person with whom sheet discussed	Bob Morris/ Peter Winder
Process Guidance Note	PG 6/23 & 32
Local Authority Reference	PPC/B/05
Inspector's Name	Geoff Dowker/ Alison Coward/ Ivor Churcher
Date	3 rd July 2019

Environmental Impact Appraisal

Component 1 – Inherent Environmental Impact Potential				
APRR Risk Rating Category Possible Scores Score Awarde				
(A) Category 1	10			
(B) Category 2	20	20		
(C) Category 3 30				

Component 2 - Progress with Upgrading				
Status of Upgrading	Possible Scores	Score Awarded		
(A) Upgrading not complete but PG Note deadline has	5			
yet to be reached				
(B) Upgrading not yet complete and PG Note deadline	10			
has passed				
(C) Upgrading complete and meets BATNEEC	0	0		
Requirements				
(D) Emissions control exceeds BATNEEC Requirements	-10			

Component 3 - Sensitivity and Proximity of Receptors (circle appropriate score)				
	Sensitivity of Receptors			
Proximity to Emission Source	(x) High	(y) Med	(z) Low	
(A) < 100m*	20	12	5	
(B) 100 - 250m*	12	10	3	
(C) 250 - 500m*	5	3	1	
(D) >500m*	θ	θ	θ	

* All distances should be multiplied by a factor of 2 for mineral and cement & lime processes and by a factor of 4 for combustion, incineration (not cremation), iron & steel and non-ferrous metal processes.

Note: Distances should be measured from the process itself, rather than the site boundary.

Component 4 – Other Targets				
	Possible Scores	Score Awarded		
(A) Other air pollution problems in the local area to	10			
which process is a potential contributor				
(B) No such air pollution problems	0	0		

Total for Environmental Impact AppraisalRange 0 to 7040

Operator Performance Appraisal

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

Scoring for Component 6 - Assessment of Monitoring, Maintenance and Records				
	Possible Scores			
Criterion	(x)	(y) No	(z)	Score
	Yes		N/A	Awarded
(A) All monitoring undertaken to the degree	0	10	0	0
required in the authorisation?				
(B) Monitoring requirements reduced because	-5	0	0	0
results over time show consistent compliance?				

(C) Process operation modified where any problems indicated by monitoring?	0	5	0	0
(D) Fully documented and adhered to	0	5	0	0
maintenance programme, in line with authorisation?				
(E) Full documented records as required in authorisation available on-site?	0	5	0	0
(F) All relevant documents forwarded to the authority by date required?	0	5	0	0
Total Score		(-5 to 30)		0

Component 7 - Assessment of Management, Training and Responsibility				
	Possible Scores			
Criterion	(x)	(y) No	(z)	Score
	Yes		N/A	Awarded
(A) Documented procedures in place for	0	5	0	0
implementing all aspects of the authorisation?				
(B) Specific responsibilities assigned to	0	5	0	0
individual staff for these procedures?				
(C) Completion of individual responsibilities	0	5	0	0
checked and recorded by the company?				
(D) Documented training records for all staff	0	5	0	0
with air pollution control responsibilities?				
(E) Trained staff on site throughout periods	0	5	0	0
where potentially air-polluting activities take				
place?				
(F) Is an 'appropriate' environmental	-5	0	0	-5
management system in place?				
Total Score		(-5 to 25)		-5

Total for Operator Performance Appraisal	Range -10 to	-5
	105	

Overall Score for the Process	Range -10 to 175	35
Regulatory Effort Category	Low/Med/High	Low
High =>80, med = 40 – 80, low = <40		