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Local Air Pollution Prevention and Control

LAPPC Risk Method

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defra
Department for Environment
Food and Rural Affairs

Department for Environment, Food and Rural Affairs
Nobel House
17 Smith Square
London SW1P 3JR

Tel: 020 7238 6000
Website: www.defra.gov.uk

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Local Authority Pollution Policy Team
Atmospheric Quality and Industrial Pollution Programme
Defra
Zone 5F Ergon House
17 Smith Square
SW1P 3JR
Tel; 020 7238 1692
Email: Control.pollution@defra.gsi.gov.uk

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LAPPC Risk Method

A1.1Introduction

A.1.1.1 Overview of the Risk Assessment Method

This risk assessment method is intended for use by local authorities in determining the relative level of risk associated with activities regulated under the Local Air Pollution Prevention and Control regimes. The method assigns a level of proposed 'regulatory effort' to individual processes (high, medium or low) according to their relative risks. The method relates to effort expended in regulating processes once they have been permitted (i.e. what is covered by the subsistence element of the LAPPC fees and charges). The method is divided into 2 parts. **Part 1** covers all standard part B activities not covered in part 2. **Part 2** covers reduced fee activities and mobile plant.

Risk assessment using this method is based upon both the nature of the process and the way in which it is managed. It is divided into 2 parts

- **Environmental Impact Appraisal (EIA)**, which concerns the potential environmental impacts of a process according to its type, level of upgrading to meet regulatory requirements, and its location (applies to Part 1 activities only), and
- **Operator Performance Appraisal (OPA)**, which relates to how well the operator manages the potential environmental impact of the process.

Each of these aspects is evaluated by scoring the process against a number of different components. These components are listed below, together with guidance on how they should be applied and their implications for regulatory planning. Where a component is not relevant, a score of zero should be awarded. Example score sheets are provided to record the scores for each process.[1]

[1] Each of the possible scoring options is given a unique scoring identifier. Thus, a standard part B activity falling into risk rating 'category 2' under component 1 and with highly sensitive receptors less than 100m away can be identified as 1-B, 3-A-x.

Part 1: Standard Part B Activities other than Reduced Fee Activities and Mobile Plant

A1.1.2 Use of the Risk Assessment Method

Set out below is the approach that local authorities should take in applying the risk assessment method and utilising the results in determining regulatory effort.

Step 1 Desk-based scoring of processes. All of the Part B processes under an authority's control should be scored using the risk assessment method, based on information held on file, together with officers' knowledge of the processes concerned. The output will be a series of scores for different attributes and allocation of the process to a risk category, which is linked to the regulatory effort required by the process.

Step 2 Use the score sheets during visits to selected processes. Where scheduled visits to processes are undertaken, the scoring should be used as a basis for discussion with operators. Where possible, a copy of the methodology and draft completed score sheet should be provided to the operator prior to the visit. The completed score sheet should be shown to the operator and the scores discussed with them, together with any action that could be taken to reduce their scores and risk category. It is envisaged that this should not add significantly to the length of the visit but should provide a focus for discussion.

Step 3 Use the scoring to determine regulatory effort. Section A1.4 provides guidance on how the results of the risk assessment method should normally be used in determining the level of resources to be devoted to the subsistence activities of processes.

Step 4 Review scores on a regular basis. Scores for each process should be reviewed on regular basis, and at least annually. In particular, scores should be reviewed following visits, any changes to the authorisation, receipt of complaints or when enforcement action is taken.

A separate assessment should be carried out for every activity which attracts a separate subsistence charge.

A1.2 Environmental Impact Appraisal

A1.2.1 Component 1: Inherent Environmental Impact Potential of Process

This component of the methodology reflects the fact that certain process types have inherently greater potential environmental impacts than others and may thus require greater regulatory effort.

The Advisory Panel on Risk Ranking (APRR) has rated the various processes, as defined by the relevant PG Note(s), into three categories according to their inherent environmental impact potential. The rating is provided at Appendix 1.

Where more than one PG Note is used in deriving a single authorisation, authorities should base the assessment on the PG Note that is the main one used for the purposes of determining BAT/BATNEEC for the process. However, where there are combined processes as provided for in the rules in Schedule 2 of the Environmental Protection (Prescribed Processes and Substances) Regulations (and now included in the LAPPC charging scheme), the PG Note with the highest risk rating should be used.

Table A1.1: Scoring for Component 1 - Inherent Environmental Impact Potential	
Risk Rating	**Score Awarded**
(A) Category 1	10
(B) Category 2	20
(C) Category 3	30

A1.2.2 Component 2: Progress with Upgrading

This component of the methodology assesses the extent to which a process has been upgraded to comply with the BAT/BATNEEC requirements set out in the process's authorisation. Not only may processes that have not completed upgrading pose a greater potential risk; they are also likely to require more regulatory effort in monitoring progress with the upgrading. Conversely, processes that exceed current BAT/BATNEEC requirements will pose reduced risks and may require less regulatory effort.

There are four possible classifications for scoring of processes:

- upgrading to meet the requirements of the authorisation is not yet complete, due to the Guidance Note deadline not yet having been reached;

- upgrading is not yet complete for other reasons, such as variations to the process and the Guidance Note deadline has passed;

- upgrading is complete and the process meets all of the current applicable BAT/BATNEEC requirements; or

- emissions control not only meets current BAT/BATNEEC requirements but goes beyond those requirements, resulting in lower emissions (for example, where improved emissions arrestment plant has been adopted voluntarily in plant already meeting BAT/BATNEEC

requirements or where Process Guidance Note requirements are met over a year before the due date).

The nature and extent of upgrading required, or the degree to which BAT/BATNEEC is exceeded, may vary considerably amongst processes. However, to ensure objectivity and consistency, the same scores should be awarded regardless of the magnitude of these factors. Past failure to complete upgrading within the required time should not be included in this Component.

Table A1.2: Scoring for Component 2 - Progress with Upgrading	
Status of Upgrading	**Score**
(A) Upgrading not complete but PG Note deadline has yet to be reached	5
(B) Upgrading not yet complete and PG Note deadline has passed	10
(C) Upgrading complete and meets BATNEEC Requirements	0
(D) Emissions control exceeds BATNEEC Requirements	-10

A1.2.3 Component 3: Sensitivity and Proximity of Receptors

This component assesses the extent to which any 'receptors' in the vicinity of a process could be impacted by emissions from the process. This will be determined by the sensitivity of the receptors in question (their number or the particular importance attached to them) and also by their proximity to the process. This component is not intended to reflect the nuisance potential of a process, and thus the potential for complaints (this is included under the 'Compliance Assessment' component below), but rather the potential for physical harm to the receptors in question.

The sensitivity of receptors is classified as high, medium or low:

- **high -** schools, residential areas, hospitals, designated environmental areas (e.g. SSSIs);

- **medium -** offices, isolated residences, major roads, footpaths/cycle paths, agricultural land; and

- **low -** public open space, minor roads, industrial areas, car parks, derelict land.

The distances used to determine proximity are based upon the distances up to which statutory consultation is required where SSSIs are near to Part B processes (based on General Guidance Note GG3 and AQ17(03)). Whilst in practice the distances at which different receptors are affected will vary according to the receptor and the pollutant in question, these standard distances are used in order to assure simplicity and consistency in application of the method.

Scores are awarded according to a combination of the sensitivity of receptors and their proximity to the emission source. The highest possible score is awarded, which may not necessarily be the score for the most sensitive receptor. For example, where there is a high sensitivity receptor 300m away and a medium sensitivity receptor 150m away, the respective scores are 5 and 10 and the latter is the score awarded.

Table A1.3: Scoring for Component 3 - Sensitivity and Proximity of Receptors

Proximity to Emission Source	**Sensitivity of Receptors**		
	(x) High	**(y) Medium**	**(z) Low**
(A) < 100m*	20	12	5
(B) 100 - 250m*	12	10	3
(C) 250 - 500m*	5	3	1
(D) >500m*	0	0	0

** 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.

Mobile plant: Some mobile plant tend to be operated in fixed locations and can therefore be rated as above. For the remainder use part 2 of the method.

A1.2.4 Component 4: Other Targets

An additional 10 points should be scored if there are particular air pollution problems in the local area to which the process is a potential contributor; for example, where an Air Quality Management Area has been established for a pollutant that is emitted from the process in question.

Table A1.4: Scoring for Component 4 - Other Targets

	Score
(A) Other air pollution problems in the local area to which process is a potential contributor	10
(B) No such air pollution problems	0

A1.3 Operator Performance Appraisal

A1.3.1 Component 5: Compliance Assessment

This section relates to any incidence of non-compliance that has occurred in the twelve months immediately preceding the assessment or review of the assessment. Compliance is assessed in terms of individual incidents; a single incident that led to a number of justified complaints should be scored as being one incident. For each incident, a score is awarded according to the level of

regulatory action required[2]. If there has been no non-compliance, a score of zero is awarded.

For example, a hypothetical cement process received three justified complaints on three separate occasions around eight months ago from local residents. The emissions leading to the justified complaints were caused by repeated failures of a bag filter, which was remedied by the operator replacing the filter bags. The process also received an enforcement notice nine months ago in relation to a failure to record emissions in the log book. The score would be 30 points for the justified complaints and 15 points for the enforcement notice, giving a total of 45 points.

- The maximum possible score under normal operating conditions is 55* points; for example, a score of 55 points will be awarded even where there have been more than 10 incidents leading to justified complaints. This is to ensure that scores for non-compliance do not distort the overall scores.
  *Maximum rises to 80 only if compliance assessment condition F is breached
- Only air pollution related incidents should be included under this component (i.e. general nuisance or noise related incidents are not covered).
- All incidents that have occurred within the twelve months immediately preceding the assessment or review of the assessment should be included.
- Where a justified complaint has been received but no incident leading to non-compliance has occurred, no score should be awarded. The process operator should not be penalised under this component if they are in compliance with the permit and the general/residual BAT condition.

Table A1.5: Scoring for Component 5 - Compliance Assessment	
Scale of Non-Compliance	**Score**
(A) Incident leading to justified complaint but no breach of any specific authorisation condition or of the general/residual BATNEEC condition	0
(B) Incident leading to a justified complaint*	10 per incident
(C) Breach of authorisation not leading to formal action	10 per incident
(D) Incident leading to formal caution, Enforcement Notice or prosecution	15 per incident
(E) Incident leading to a Prohibition Notice or Suspension Notice	20 per incident
Total	**(Max 55)**
Where Facility has been on Reduced Charges due to Mothballing or Reduced Operating Levels	

[2] For administrative purposes, processes may be identified using the number of incidents under each category. For example, a process having two incidents leading to a justified complaint and one leading to a formal caution would be identified as 5-B2,D1

(F) Failure to notify the regulator of restart or increase in level of operation to above the threshold requiring a permit at the installation in accordance with acceptance letter	25
Total (Applies only where condition F has been breached)	**(Max 80)**
* *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.*	

A1.3.2 Component 6: Monitoring, Maintenance and Records

This component concerns the monitoring activity required to be undertaken by the process operator, the maintenance programme for pollution control equipment (as specified in the authorisation), and the record keeping undertaken by the operator

Where any of the elements is not applicable, a score of zero should be awarded. Where the authority has chosen to undertake monitoring itself, operators should not be awarded an adverse score (unless they have failed to meet their own obligations).

Table A1.6: Scoring for Component 6 - Assessment of Monitoring, Maintenance and Records

Criterion	Score		
	Yes	**No**	**N/A**
(A) All monitoring undertaken to the degree required in the authorisation?*	0	10	0
(B) Monitoring requirements reduced because results over time show consistent compliance?	-5	0	0
(C) Process operation modified where any problems indicated by monitoring?	0	10	0
(D) Fully documented and adhered to maintenance programme, in line with authorisation?	0	10	0
(E) Full documented records as required in authorisation available on-site?	0	5	0
(F) All relevant documents forwarded to the authority by date required?	0	10	0
Total Score	(-5 to 45)		

**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.*

A1.3.3 Component 7: Management, Training and Responsibility

This component assesses whether documented procedures for implementing all aspects of the authorisation are in place, with responsibility allocated to particular staff members. The extent of documentation may vary, particularly for smaller processes.

Additional points are awarded where an 'appropriate' environmental management system is in place. Guidance on what constitutes an 'appropriate' management system is given below (see AQ3(04).

Interpretation of 'appropriate' management systems
"It is ... desirable that processes put in place some form of structured environmental management system (EMS),whether by adopting published standards (ISO 14001 or the EU Eco Management and Audit Scheme [EMAS]) or by setting up an EMS tailored to the nature and size of the particular process. Process operators may also find that EMS will help identify business savings. Local enforcing authorities should use their discretion, in consultation with individual process operators, in agreeing the appropriate level of environmental management. Simple systems which ensure that LAPC considerations are taken account of in the day-to-day running of a process may well suffice, especially for small and medium-sized enterprises. While authorities may wish to encourage wider adoption of EMS, it is outside the legal scope of an LAPC authorisation/LAPPC permit to require an EMS for purposes other than LAPC/LAPPC compliance."

Table A1.7: Scoring for Component 7 - Assessment of Management, Training and Responsibility

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

Note: In relation to the last criterion, when the relevant PG Note has been updated to include guidance on 'appropriate' management systems, processes should be scored zero if such a system is in place and five if such a system is not in place. [DEFRA and WAG envisage that guidance on appropriate management systems be standard in all of the next generation PG Notes (these will have effect by the end of 12 months from the date of publication of the relevant PG Note).]

A1.4 Overall Scoring and Determining Regulatory Effort

A1.4.1 Overall Scoring

The overall score for a process is obtained by summing the scores for each component. The table below summarises the maximum possible scores under each of the components. The total maximum score is 175.

Table A1.8: Overall Maximum Scores		
Assessment Component	**Minimum Score**	**Maximum Score**
Environmental Impact Appraisal		
1. Inherent Environmental Impact Potential of Process	10	30
2. Progress with Upgrading	-10	10
3. Sensitivity and Proximity of Receptors	0	20
4. Other Targets	0	10
Operator Performance Appraisal		
5. Compliance Assessment	0	55 (80*)
6. Monitoring, Maintenance and Records	-5	45
7. Management, Training and Responsibility	-5	25
Total	**-10**	**195 (220*)**

*Higher maxima apply only if compliance assessment condition F is breached

A1.4.2 Determining the Level of Regulatory Effort

The result of the risk assessment can then be used to determine the appropriate level of 'regulatory effort' to be devoted to the subsistence aspects of a process. The total score awarded places the process in one of three regulatory effort categories, as follows:

1. A process scoring less than 40 points is categorised as 'Low'.
2. A process scoring between 40 and 80 is 'Medium'.
3. One scoring over 80 points is 'High'.

The table below gives an indication of the amount of regulatory effort that could be devoted to the process in question, depending upon the regulatory effort category.

Table A1.9: Determination of Regulatory Effort from Scores		
	Regulatory Effort	
Overall Score	**Category**	**Hours per Year***
Less than 40	Low	9 to 15
40 to 80	Medium	18 to 30
Over 80	High	27 to 45
* *Estimated average regulatory time per process varies from 18 to 30 hours per year*		

Regulatory effort refers to the time taken to regulate a process that is dependent upon the process characteristics. This includes both time spent on inspections and time spent at the office preparing for inspections, writing reports and reviewing data supplied by operators. The average regulatory time spent per process varies from 18 to 30 hours per year.

Note that it is not intended that application of the risk-based method should lead to a significant reduction in overall regulatory effort; rather effort should be prioritised towards those processes posing the greatest risk of environmental pollution.

Paragraphs 27.21-23 of the General Guidance Manual (as amended in March 2009) advise on the minimum levels of inspection Defra would expect for high, medium and low risk installations/mobile plant.

Part 2: Reduced Fee Activities and Mobile Plant

B1.1 Overview

A simplified permitting system has been in place for a number of years for small waste oil burners, petrol stations, dry cleaners, and (since January 2007) for vehicle refinishing activities which use PG6/34b as guidance.

Part 2 of this guidance covers risk based inspection for the reduced fee sectors as well as for mobile plant (referred to below as "**Part 2 activities**"). The latter two sectors are subject to variations on the mainstream charges and were not covered by the original 2003 risk method. Reduced fee activities are dry cleaning operations, small waste oil burners, petrol stations and vehicle refinishing carried out as part of vehicle repair, conservation or decoration.

Reduced fee activities are regarded by Defra as being simpler to regulate and generally of low environmental impact compared with the other Part B sectors, hence the lower fees and charges which have been applied for several years. Defra, in consultation with a panel of local authorities and LACORS, have concluded that they can all be regarded as individually having a lower environmental risk potential than the other Part B sectors and therefore there is no need to undertake the Environmental Impact Appraisal component of the risk method for these sectors. Mobile plant, other than those operated on fixed locations, cannot be subject to EIA assessment because of the unique feature that they have a permit which covers their movement to different locations.

B.1.2 Method - general

Operator Performance Appraisal comprises three components.

I. Compliance assessment
II. Monitoring, maintenance and records
III. Management, training and responsibility

Set out below is the approach that local authorities should take in applying the risk assessment method and utilising the results in determining regulatory effort.

Step 1 Desk-based scoring of processes. All Part 2 activities should be scored using the risk assessment method, based on information held on file, together with officers' knowledge of the processes concerned. The output will be a series of scores for different attributes and allocation of the process to a risk category, which is linked to the regulatory effort required by the process.

Step 2 Use the score sheets during visits to relevant installations. Where scheduled visits to installations are undertaken, the scoring should be used as a basis for discussion with operators. Where possible, a copy of the methodology and draft completed score sheet should be provided to the operator prior to the visit. The completed score sheet should be shown to the operator and the scores discussed with them, together with any action that could be taken to reduce their scores and risk category. It is envisaged that this should not add significantly to the length of the visit but should provide a focus for discussion.

Step 3 Use the scoring to determine regulatory effort. The final section of this methodology provides guidance on how the results of the risk assessment method should normally be used in determining the level of resources to be devoted to the subsistence activities of processes.

Step 4 Review scores on a regular basis. Scores for each installation should be reviewed on a regular basis: at least annually for installations subject to annual full inspections and at least once every two or three years for installations subject to two- or three-yearly inspections. A separate assessment should be carried out for every installation/activity which attracts a separate subsistence charge.

B.1.3 Method - Operator Performance Appraisal

The method set out below is essentially the same as in Part 1, except that examples specific to the Part 2 activities have been provided under the heading “sector-specific criteria for xxxx component”. Where the sector-specific criteria contain more than one question for a given line in the main component tables (A, B or C etc…), a failure in relation to any single question will amount to a “no” for the relevant line.

The method should be applied to each installation individually, even when one company operates several installations and has national procedures. The assessment needs to take account of the particular compliance record, maintenance performance, record-keeping etc..for each dry cleaning premises, petrol station etc. **The only exception is standard mobile plant not using simplified permits in which case the following applies**:

> **Mobile Plant.** When the total of all points for all permits operated by the same company adds up to 30, and if any permits are rated at low risk, one such permit is raised to medium risk, when the total of those points adds to 60 points and any permits are still rated at low risk, another permit is raised to medium risk, etc… If all permits are medium risk, the same process applies using increments of 25 rather than 30.
>
> In the case of short term transfers of permits under EP regulation 21, the person who hires out the equipment (if they hire it without an operator) is subject to operator performance appraisal. Whereas the

operator of a short-term hire is responsible for the operation of the plant, the person to whom the permit will return has the responsibility to ensure the equipment is in good order and provide appropriate training, and has the option of refusing future hires to the hirer if they generate risk points. Furthermore, it is open to the person who hires out the equipment to include in the contract a penalty clause (as with car hire) if risk points are scored.

B.1.4 Compliance assessment component

This section relates to any incidence of non-compliance that has occurred in the 12 months immediately preceding the assessment or review of the assessment. Compliance is assessed in terms of individual incidents; a single incident that led to a number of justified complaints should be scored as being one incident. For each incident, a score is awarded according to the level of regulatory action required[3]. If there has been no non-compliance, a score of zero is awarded.

For example, a hypothetical dry cleaners received three justified complaints from local residents on three separate occasions around eight months ago. The emissions leading to the justified complaints were caused by solvent leaks which were remedied by the operator having the equipment fully serviced. The process also received an enforcement notice nine months ago in relation to a failure to record emissions in the log book. The score would be 15 points for the justified complaints and 15 points for the enforcement notice, giving a total of 30 points.

In using the method:

- the maximum possible score under normal operating conditions for this component is 50* points: e.g. a score of 50 points will be awarded even where there have been more than ten incidents leading to justified complaints. This is to ensure that scores for non-compliance do not distort the overall scores
  *maximum rises to 65 only if compliance assessment condition F is breached
- only air pollution related incidents should be included under this component (e.g. noise nuisance is not covered)
- all incidents that have occurred within the 12 months immediately preceding the assessment or review of the assessment should be included.
- where a justified complaint has been received but no incident leading to non-compliance has occurred, no score should be awarded. The

[3] For administrative purposes, processes may be identified using the number of incidents under each category. For example, an installation having two incidents leading to a justified complaint and one leading to a formal caution would be identified by looking at Table A in section I: line (b) x 2 (i.e. 10 points) plus line (d) x 1 (a further 15 points).

installation operator should not be penalised under this component if they are in compliance with the permit and the residual BAT condition.

Table B1.1 Scoring for compliance assessment component		
Scale of Non-Compliance	**Yes**	**No**
(A) incident leading to justified complaint but no breach of any permit condition	0	0
(B) incident leading to a justified complaint	5 per incident	0
(C) breach of permit not leading to formal action	10 per incident	0
(D) incident leading to formal caution, Enforcement Notice or prosecution	15 per incident	0
(E) incident leading to a Prohibition Notice or Suspension Notice	20 per incident	0
Where Facility has been on Reduced Charges due to Mothballing or Reduced Operating Levels		
(F) Failure to notify the regulator of restart or increase in level of operation to above the threshold requiring a permit at the installation in accordance with acceptance letter	15	0
Total		

There are no sector-specific criteria for the compliance assessment component.

B.1.5 Monitoring, maintenance and records component

This section concerns the monitoring activity required to be undertaken by the installation operator, the maintenance programme for pollution control equipment (as specified in the permit), and the record keeping undertaken by the operator

Where any of the elements is not applicable, a score of zero should be awarded. Where the authority has chosen to undertake monitoring itself, operators should not be awarded an adverse score (unless they have failed to meet their own obligations). Where more than one test is listed as a criterion for a particular sector in the supplementary sector-specific checklist, failure to meet a single test means the criterion has not been met.

Table B1.2 Scoring for assessment of monitoring, maintenance and records component			
Criterion	**Score**		
	Yes	**No**	**N/A**
(A) all monitoring undertaken to the degree required in the permit?*	0	10	0
(B) process operation modified where any problems indicated by monitoring?	0	5	0
(C) fully documented and adhered to maintenance/ service plan in place in line with the permit?	0	5	0
(D) full documented records as required in permit available on-site?	0	5	0
(E) all relevant documents forwarded to the authority by date required?*	-5	10	0
Total Score			
*These aspects relate to the operator's performance within the 12 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.			

In using the method:

- the maximum possible score for this component is 35 points: it is envisaged that each line will only score once in any 12 months, except in the case of line (e) when applied to mobile plant (where 4 failures to notify relocation will score the maximum of 35).

Note on changes from risk method in Part 1

The points for non-forwarding of documents to the authority by the date required has been increased to 10, to reflect the increased importance of providing data if inspection visit frequencies are reduced.

Sector-specific criteria for the monitoring, maintenance and records component

Line (A)

Dry cleaners Are loads weighed & weights recorded for all loads? Does the operator maintain a weekly inventory of solvent usage, product cleaned, and solvent waste sent for recovery or disposal?
All Other Sectors Are emissions monitored as required in the permit?

Are emissions and emissions monitoring recorded as required in the permit?

Line (B) – none

Line (C)

Small waste oil burners Does the operator have records showing that each appliance has been serviced regularly in accordance with the manufacturer's instructions?
Petrol stations Has a written maintenance programme been provided to the regulator with respect to pollution control equipment?
Vehicle refinishers and mobile plant Is an appropriate maintenance schedule in place and available on request?

Line (D)

Small waste oil burners Are there records of servicing for a minimum of three years prior to inspection?
Petrol stations Is there a log book at the authorised premises incorporating details of all maintenance, examination and testing, inventory checking, installation and repair work carried out?
Vehicle refinishers 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?

Line (E)

Mobile plant Has operator notified the regulator promptly of all relocations of all plant?

B1.6 Management, training and responsibility component

This section assesses whether documented procedures for implementing all aspects of the permit are in place, with responsibility allocated to particular staff members.

Additional points are awarded where an 'appropriate' environmental management system is in place. Guidance on what constitutes an 'appropriate' management system is given below (extract from paragraph 11.14 of the General Guidance Manual.
http://www.defra.gov.uk/environment/ppc/localauth/pubs/guidance/manuals.htm

> "It is ... desirable that processes put in place some form of structured environmental management system (EMS), whether by adopting published standards (ISO 14001 or the EU Eco Management and Audit Scheme [EMAS]) or by setting up an EMS tailored to the nature and size of the particular process. Process operators may also find that EMS will

help identify business savings. Local enforcing authorities should use their discretion, in consultation with individual process operators, in agreeing the appropriate level of environmental management. Simple systems which ensure that LAPC considerations are taken account of in the day-to-day running of a process may well suffice, especially for small and medium-sized enterprises. While authorities may wish to encourage wider adoption of EMS, it is outside the legal scope of an LAPC authorisation/LAPPC permit to require an EMS for purposes other than LAPC/LAPPC compliance."

The relevant process guidance notes do not specify including EMS provisions in permits for small waste oil burners or dry cleaners. Similarly, they are not envisaged for petrol stations[4]. In these cases, the '-5' in line (F) is still available if a site-based EMS is in place; the zero score for not having and EMS means there is no penalty for not having one.

Table B1.3 Scoring for Management, Training and Responsibility Component

Criterion	Score		
	Yes	**No**	**N/A**
(A) Documented procedures in place for implementing all aspects of the permit?	0	5	0
(B) Specific responsibilities assigned to individual staff for these procedures?	0	5	0
(C) Completion of individual responsibilities checked and recorded by the company?	0	5	0
(D) Documented training records for all staff with air pollution control responsibilities?	0	5	0
(E) Trained staff on site throughout periods where potentially air-polluting activities take place?	0	5	0
(F) Is an 'appropriate' environmental management system in place and working effectively?	-5	0	0
Total Score			

Sector-specific criteria for the management, training and responsibility component[5]

line (A)

[4] Paragraphs 11.20 and 11.21 of the General Guidance Manual say: "Defra and WAG consider it unlikely that there will be any further air pollution control benefits to be secured by additionally adopting a structured environmental management approach for each individual service station. This is provided that appropriate conditions are included in permits dealing with vapour recovery and collection, preventative maintenance, prevention and handling of leaks, delivery, vapour loss during storage, instructions, operator competence etc, together with (if appropriate) a general BAT condition (see paragraphs 12.10 and 11 of the Manual). For information: it is also worth noting that the larger petrol companies are likely to have some form of environmental management system covering the retail activities they operate."

[5] Training requirements should be proportionate to the circumstances

Dry cleaners Are all operating staff aware of where the operating manual for each dry cleaning machine can be found and do they have ready access to it?
Small waste oil burners Are clear instructions available at all times on or near the appliance detailing the correct operation and maintenance of the equipment?
All other sectors 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?

line (B)

Dry cleaners Are nominated trained members of staff exclusively permitted to operate the machines
Small waste oil burners Are nominated members of staff exclusively permitted to operate the appliance?
Petrol Stations Are all staff with responsibility for operating the installation trained to be aware of their responsibilities under the permit?

line (C)

Dry cleaners Are all operating staff trained in the operation of each dry cleaning machine and the control and use of dry cleaning solvents?
Small waste oil burners Is list of staff permitted to operate the appliance available?
Petrol stations, vehicle refinishers and mobile plant Does the operator maintain, and make available on request, a statement of training requirements for each operational post?

line (D)

Dry cleaners Are records kept of training received by operating staff?
Small waste oil burners Are all nominated SWOB operating staff trained in, and conversant with, its operation? (Staff operating vapourising burners should be particularly conversant with the correct procedure for lighting from cold.)
Petrol stations Does the operator keep, and make available, a record of the training received by each person whose actions may have an impact on the environment?
Vehicle refinishers Does the operator maintain a record of staff training and instruction and make it available to the regulator on request?
Mobile plant Are all staff with responsibility for operating the process sufficiently trained to be aware of their responsibilities under the permit, minimising emissions on

start up and shut down and taking action to minimise emissions during abnormal conditions?

line (E)

Dry cleaners Are suitably trained or experienced staff on site while machines are operating?
Small waste oil burners Are staff nominated to operate the appliance on site while appliance is in use?
Petrol stations Is there a competent trained person who remains near the tanker during unloading? (Delivery drivers may be trained as the competent person.)

line (F) - none

B1.7 Method - overall scoring and determining regulatory effort

B.1.7.1 Overall Scoring

The overall score for an installation is obtained by summing the scores for each component. The table below summarises the maximum possible scores under each of the components. The maximum total score is 110.

Overall Scores

Assessment Component	Minimum	Maximum
1. Compliance Assessment	0	50 (65*)
2. Monitoring, Maintenance and Records	-5	35
3. Management, Training and Responsibility	-5	25
Total	**-10**	**110 (125*)**

*Higher maxima apply only if compliance assessment condition F is breached

B1.7.2 Determining the Level of Regulatory Effort

The result of the risk assessment can then be used to determine the appropriate level of 'regulatory effort' to be devoted to the subsistence aspects of a process. The total score awarded places the process in one of three regulatory effort categories, as follows:

1. A process scoring less than **30 points** is categorised as 'Low'.
2. A process scoring between **30 and 55** is 'Medium'.
3. One scoring over **55 points** is 'High'.

The tables below give an indication of the amount of regulatory effort that could be devoted to the process in question, depending upon the regulatory effort category. The regulatory effort for small waste oil burners, dry cleaners and petrol stations (PVRI&II) assumes a 3 year inspection frequency for the lowest risk category. The regulatory effort for vehicle refinishers and mobile plant assumes a 2 year inspection frequency for the lowest risk category.

Determination of regulatory effort from scores

Small waste oil burners, dry cleaners and petrol stations with PVRI

Overall Score	Regulatory Effort	
	Category	**Hours per year**
Less than 30	Low	1.5
30 to 55	Medium	3.1
Over 55	High	4.6

PVRII petrol stations

Overall Score	Regulatory Effort	
	Category	**Hours per year**
Less than 30	Low	2.2
30 to 55	Medium	4.4
Over 55	High	6.6

Vehicle refinishers and all other reduced fee activities using simplified permits not listed above

Overall Score	Regulatory Effort	
	Category	**Hours per year**
Less than 30	Low	4.4
30 to 55	Medium	7.1
Over 55	High	10.7

Standard Mobile plant not using simplified permits (First and second permit only[6])

Overall Score	Regulatory Effort	
	Category	**Hours per permit per year**
Less than 30	Low	12.5
30 to 55	Medium	20
Over 55	High	30

[6] For subsequent permits the regulatory effort reduces in line with the sliding scale of charges.

Regulatory effort refers to the time taken to regulate a process that is dependent upon the process characteristics. This includes both time spent on inspections and time spent at the office preparing for inspections, writing reports and reviewing data supplied by operators. The average regulatory time spent per process varies according to its risk category.

Note that it is intended that application of the risk-based method should not lead to a reduction in appropriate environmental protection; rather effort should be prioritised towards those installations posing the greatest risks.

Paragraphs 27.21-23 of the General Guidance Manual (as amended in March 2009) advises on the minimum levels of inspection Defra would expect for high, medium and low risk installations/mobile plant.

Appendix to Part 1: Classification of Processes by Advisory Panel on Risk Ranking (APRR)

Table A1.10, below, provides a ranking of processes based on their inherent environmental impact potential. Process categories are placed in one of the following three categories, taking into account potential for contained and/or fugitive emissions, for health impacts, for environmental impacts and potential for 'offensiveness' impacts:

Category 1: Processes with an inherent environmental impact potential that was lower/below average when compared with other Part B processes.

Category 2: Processes with an inherent environmental impact potential that was medium/average when compared with other Part B processes.

Category 3: Processes with an inherent environmental impact potential that was higher/above average when compared with other Part B processes.

Table A1.10: Risk Rating of LAPC Processes According to APRR

Process guidance note	Category
PG1/1(04)-waste oil burners, <0.4MW	1
PG1/2(05)- waste recovered oil burners, less than 3MW	2
PG1/3(95)-boilers and furnaces, 20-50MW	1 - gas fed 2 - other fuel
PG1/4(95)-gas turbines, 20-50MW	1
PG1/5(95)-compression ignition engines, 20-50MW	1
PG1/10(92)-waste derived fuel combustion <3MW	3
PG1/11(96)-reheat, heat treatment furnaces, 20-50MW	2
PG1/12(04)-combustion of solid waste 0.4 to 3MW	3 – WID 2 - non-WID
PG1/13(04) storage, loading, unloading petrol at terminals	3
PG1/14(06)-unloading petrol into storage at service stations	1
PG1/15(04)-odorising natural gas, liquefied petroleum gas	1
PG2/1(04)-furnaces to extract non-ferrous metal from scrap	3
PG2/2(04)-hot dip galvanising	2
PG2/3(04)-electrical and rotary furnaces	Reverberatory/Rotary – 3 Gas/electric fed - 1* Crucible oil fed – 2 Crucible gas fed – 1
PG2/4(04)-iron, steel, non-ferrous metal foundry processes	Core making, chemically bonded

	moulds, thermally reclaimed sand -3 All other processes – 2*
PG2/5(04)-hot and cold blast cupolas	3
PG2/6a(04)-aluminium and aluminium alloy processes	Ingots and in house clean scrap used - 2 Other scrap used - 3
PG2/7(04)-zinc and zinc alloy processes	Ingots and in house clean scrap used - 2 Other scrap used - 3
PG2/8(04)-copper and copper alloy processes	Ingots and in house clean scrap used - 2 Other scrap used - 3
PG2/9(04)-metal decontamination processes	3
PG3/1(04)-blending, packing, loading and use of bulk cement	1
PG3/2(04)-manufacture of heavy clay and refractory goods	3
PG3/3(95)-glass (exc. lead glass) manufacturing processes	3
PG3/4(04)-lead glass manufacturing processes	3
PG3/5(04)-coal, coke, coal product and petroleum coke	Bagging plant - 1 All others processes - 2
PG3/6(04)-polishing, etching of glass etc using HF acid	3
PG3/7(04)-exfoliation of vermiculite and expansion of perlite	1
PG3/8(04)-quarry processes	1*
PG3/12(04)-plaster processes	1
PG3/13(95)-asbestos processes	3
PG3/14(04)-lime processes	1
PG3/15a(04) - roadstone coating	WID - 3 Non-WID/non gas fed - 2 Gas fed - 1
PG3/15b(04) -mineral drying	Non gas fed - 2 Gas fed - 1
PG3/16(04)-mobile crushing and screening	1
PG3/17(04)-china and ball clay & spray drying of ceramics	spray dryers -1 Ball/China clay processes - 2
PG4/1(04)- surface treatment of metals	2
PG4/2(05)- manufacture of fibre reinforced plastics	3
PG5/1(95)-clinical waste incineration < 1 tonne/hour	3

PG5/2(04)- crematoria	3
PG5/3(04)-animal carcass incineration < 1 tonne an hour	3
PG5/4(95)-general waste incineration < 1 tonne an hour	3
PG5/5(91)-sewage sludge incineration < 1 tonne an hour	3
PG6/1(00)-processing of animal remains and by-products	3
PG6/2(04)-manufacture of timber and wood-based products	1
PG6/3(04)-chemical treatment, timber, wood-based products	1
PG6/4(95)- manufacture of particleboard and fibreboard	3
PG6/5(05)-maggot breeding	3
PG6/7(04)-printing and coating of metal packaging	2
PG6/8(04)-textile and fabric coating and finishing	2
PG6/9(96)-manufacture of coating powder	2
PG6/10(97)-coating manufacturing (now 6/44(04))	1 or 2#
PG6/11(97)-manufacture of printing ink (now 6/44(04)	1 or 2#
PG6/12(91)-production of natural sausage casings, tripe, etc	2
PG6/13(04)-coil coating	2
PG6/14(04)-film coating	2
PG6/15(04)-coating in drum manufacture and reconditioning	2
PG6/16(04)-printworks	2*
PG6/17(04)-printing of flexible packaging	2
PG6/18(04)-paper coating	2
PG6/19(05)-fish meal and fish oil	3
PG6/20(04)-paint application in vehicle manufacturing	2
PG6/21(96)-hide and skin (under review)	2
PG6/22(04)-leather finishing	2
PG6/23(04)-coating of metal and plastic	2
PG6/24(05)-pet food manufacturing	cooking involved in process - 2 no cooking involved in process - 1
PG6/25(04)-vegetable oil extraction, fat and oil refining	vegetable oil processes - 2 heat refining processes - 3
PG6/26(05)-animal feed compounding	2
PG6/27(96)-vegetable matter drying	2
PG6/28(04)-rubber	carbon black used in

	process - 3 all others processes - 2
PG6/29(04)-di-isocyanate	3
PG6/30(06)-production of compost for mushrooms	2
PG6/31(96)-powder coating (including sherardizing)	1
PG6/32(04)-adhesive coating	2
PG6/33(04)-wood coating	2
PG6/34A(06)-respraying of road vehicles	1*
PG6/35(06)-metal and other thermal spraying	2
PG6/36(97)-tobacco processing	2
PG6/40(04)-coating, recoating of aircraft and components	2
PG6/41(04)-coating and recoating of rail vehicles	2
PG6/42(94)-bitumen and tar	coal tar, oxidised bitumen and cutback bitumen processes - 3 asphalt processes - 1
PG6/43(04) – pharmaceutical formulation and finishing	2
PG6/44(04) – manufacture of coating materials	1 or 2#
PG6/45(04) – surface cleaning	2
IPR 4/17 chemical storage	3

WID - Process will come under the Waste Incineration Directive
Non WID - Process will not come under the Waste Incineration Directive
** - Where a particular process is large for the sector and, in the judgement of the EHO, this has significant impacts for risk, the ranking should be increased by one category.*
 # - Local authorities to decide for themselves which category. Feedback from the first year of operation is that most local authorities rated coating processes at category 1.