## PERMIT CONDITIONS COMPLIANCE CHECK REPORT

| Installation Address: | Clarks Bodyworks (Humberston) Ltd Jackson Place <br> Humberston <br> North East Lincolnshire <br> DN36 4AS |
| :---: | :---: |
| Contact: | Seremy Clark |
| Permit Ref: | EP/200200003 |
| Date of Varied Permit: |  |
| Permitted activity: | Re-spraying of Road Vehicles |
| Guidance Note: | PG $6 / 34$ (04) |
| Date of Visit: | $30109114$ |
| Report Reference: | CBWA1 |
| Condition number: |  |
| 1.1 Releases to air free from persistent visible emissions? | Compliont |
| 1.2 Emissions to air free from droplets? | Yes |
| 1.3 Compliant organic solvent content? | Yes. |
| 1.4 Emissions from combustion not exceed Ringlemann shade 1 | Yes |
| 1.5 No offensive odour beyond site boundary? | no offensive odour beyond site boundary. |
| 1.6 No odour masking agents used? | Compliont |
| 1.7 Zonda or Davair booths used? | Yes. |
| 1.8 Spraybooths meet emission limit of particulate matter of $10 \mathrm{mg} / \mathrm{m} 3$ ? Audible alarm for +ive pressure? | Yes. <br> Serviced by Beta 6 motithly and cleorance check iz monthly. last serviced by Beta $10^{\text {th }}$ April 2 |

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| 1.9 HVLP spray guns used? | Yes. |
| :---: | :---: |
| 1.10 Any changes to dust extraction system? (Pneumatic NTD2002) | - Serviced 12 monthly by Fumex on $11 / 1013$. Compliant. |
| 1.11 What precautions are made to minimise emissions during start-up and shut down? | suitable meosures <br> spare filters availoble for booth |
| 2.1 Visible emissions assessment made daily and at suitable location/s? Recorded? | and internal checks schedule i <br> Yes. |
| 2.2 Odour assessment made daily? Recorded? | Yes |
| 2.3 Logbook maintained with observations, results and time/date? | Yes |
| 2.4 Records of paint, organic solvents? Six monthly solvent usage supplied to NELC? | Yes - solvent usage supplied and received on the0207.12. |
| 3.1 Coatings containing VOC stored in closed storage containers and handled with care? | Yes |
| 3.2 Absorbent material available for spillages? Good house keeping maintained? | Yes. |
| 3.3 Waste removed by licensed waste contractor? Receipts kept? | Yes safetyklean |
| 3.4 Drums and containers stored in secure, well-ventilated storage areas? Lids tightly closed? | Yes |
| 3.5 Mixing of solvents carried out in mixing rooms? | Yes |
| 3.6 Programmable scales? | Yes |
| 3.7 solvent wipes placed in labelled metal bins with self- | Yes |

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| closing lids? |  |
| :--- | :--- |
| 3.8 | Yes |
| 3.9 Review programme of <br> available less voc cleaning <br> fluids? | Yes |
| 3.10 Spray-gun testing <br> completed into equipment <br> cleaning machine? |  |
| 3.11 Totally enclosed <br> equipment cleaning machines <br> used? | Yes. |
| 4.1 |  |
| 4.2 |  |
| 4.3 Stacks or vents not <br> restricted at final discharge point <br> such as cowl/cap? (with <br> exception of a cone) | Yes |
| 5.1 Spare filter? Preventative <br> maintenance programme and <br> service records? | Yes |
| 5.2 Staff levels/ training <br> records? | Yes. |
| 5.3 Malfunctions recorded? | Yes |

## Process Risk Assessment

## Operator Performance Appraisal

| Compliance Assessment |  |  |
| :--- | :---: | :---: |
| Scale of Non-Compliance (Within 12 month <br> period prior to review) | Possible <br> Scores | Score <br> Awarded |
| (A) Incident leading to justified complaint but no <br> breach of any permit condition | 0 points |  |
| (B) Incident leading to a justified complaint* | 5 per <br> incident |  |
| (C) Breach of permit not leading to formal <br> action | 10 per <br> breach |  |
| (D) Incident leading to formal caution, <br> Enforcement Notice or prosecution | 15 per <br> incident |  |
| (E) Incident leading to a Prohibition Notice | 20 per <br> incident |  |
| Total | (Max. 50) | C |
| * 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. |  |  |


| Assessment of Monitoring, Maintenance anc | Reco |  |  |  |
| :---: | :---: | :---: | :---: | :---: |
| Criterion | Possible Scores |  |  | Score Awarded |
|  | $\begin{gathered} (x) \\ \text { Yes } \end{gathered}$ | $\begin{aligned} & \text { (y) } \\ & \text { No } \end{aligned}$ | $(\mathrm{z})$ N/A |  |
| (A) All monitoring undertaken to the degree required in the authorisation? | 0 | 10 | 0 | $y 0$ |
| (B) Process operation modified where any problems indicated by monitoring? | 0 | 5 | 0 | NIA O |
| (C) Is an appropriate maintenance schedule in place and available on request | 0 | 5 | 0 | y 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 | y 0 |
| (E) All relevant documents forwarded to the authority by date required?* | -5 | 10 | 0 | $y-5$ |
| Total score |  | to |  | -S |

*These aspects relate to the operators performance within 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

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| Criterion | Possible Scores |  |  | Scores Awarded |
| :---: | :---: | :---: | :---: | :---: |
|  | $\begin{aligned} & \hline(x) \\ & \text { Yes } \end{aligned}$ | $\begin{aligned} & \text { (y) } \\ & \text { No } \end{aligned}$ | $\begin{array}{r} (z) \\ \text { N/A } \\ \hline \end{array}$ |  |
| (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 | Y0 |
| (B) Specific responsibilities assigned to individual staff for these procedures? | 0 | 5 | 0 | $y 0$ |
| (C) Completion of individual responsibilities checked and recorded by the company? | 0 | 5 | 0 | yo |
| (D) Does the operator maintain a record of staff training and instruction and make it available to the regulator on request? | 0 | 5 | 0 | Y 0 |
| (E) Trained staff on site throughout periods where potentially air-polluting activities take place? | $0$ | 5 | 0 | $y 0$ |
| (F) Is an 'appropriate' environmental management system in place? | -5 | 0 | 0 | NA O |
| Total से |  | to |  | $\bigcirc$ |


| OVERALL SCORE FOR THE PROCESS | Range -10 to <br> 110 | -5 |
| :--- | :---: | :---: |
| REGULATORY EFFORT CATEGORY <br> $*$ <br> high=score of $>55$ medium $30-55$ and low $<30$ | LOW, MED, <br> HIGH | LOW |

Officer: VICky THOMPSON
Officer Signature: $V$. Thempson.
Operator Signature JClark
Date: 30/09/14

