



Environmental Protection Team

Environmental Permitting (England & Wales) Regulations 2016 Part B Installation Risk Assessment Scoresheet

Permit Holder Name:	ITW Limited
Contact:	
Address:	ITW Imagedata, Factory Lane, Manningtree
Description of Installation:	Surface coating of paper and film
Officer:	
Date:	12/10/2021

Environmental Impact Appraisal

Component 1 - Inherent Environmental Impact Potential

APRR Risk Rating Category	Possible Scores	Score Awarded
(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/Permit deadline has yet to be reached	5	
(B) Upgrading not yet complete and PG Note/Permit deadline has passed	10	
(C) Upgrading complete and meets BAT requirements	0	0
(D) Emissions control exceeds BAT requirements	-10	

Component 3 - Sensitivity and Proximity of Receptors (circle appropriate score)

	Sensitivity of Receptors	
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Proximity to Emission Source	(x) High	(y) Medium	(z) Low	Score Awarded
(A) <100m*	20	12	5	
(B) 100 - 250m*	12	10	3	12
(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. All 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 which process is a potential contributor	10	
(B) No such air pollution problems	0	0
	Range 0 to 70	32

Operator Performance Appraisal

Component 5 - Compliance Assessment		
Scale of Non-Compliance	Possible Scores	Score Awarded
(A) Incident leading to justified complaint, but no breach of any specific permit condition or of the general/residual BAT condition	0 points	
(B) Incident leading to a justified complaint*	5 per incident	
(C) Breach of permit not leading to formal action	10 per breach	
(D) Incident leading to Simple Caution, Enforcement Notice or prosecution	15 per incident	
(E) Incident leading to a Prohibition Notice or Suspension Notice	20 per incident	
Total	(Max. 50)	0
Where Facility has been on Reduced Charges due to Mothballing or Reduced Operating Levels		
(F) Failure to notify the Council 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. 75)	0
* <u>Un</u> justified complaints may be e.g. those considered by the inspector to be unreasonable or which cannot be clearly linked to an incident at the installation.		

Scoring for Component 6 - Assessment of Monitoring, Maintenance and Records				
Criterion	Possible Scores			Score Awarded
	Yes	No	N/A	
(A) All monitoring undertaken to the degree required in the permit?*	0	10	0	0
(B) Monitoring requirements reduced because results over time show consistent compliance?	-5	0	0	0
(C) Process operation modified where any problems indicated by monitoring?	0	10	0	0
(D) Fully documented and adhered to maintenance programme, in line with permit?	0	10	0	0
(E) Full documented records as required in permit available on-site?	0	5	0	0
(F) All relevant documents forwarded to the Council by date required?	0	10	0	0
Total score	(-5 to 45)			0
* 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 12 months ago should be excluded.				

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

Total Score for Operator Performance Appraisal	Range -10 to 105	0
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OVERALL SCORE FOR THE PROCESS	Range -10 to 195 (220 if Condition 5F applies)	32
REGULATORY EFFORT CATEGORY *high=score of >80, medium 40-80 and low <40	LOW, MED, HIGH	LOW