

Operator Performance

		Yes/No	Points available	Points scored	Post or group responsible for each requirement	Document reference (*) or date by which systems will be in place (*see para 4.4.2)
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Operations and Maintenance section - 20%

Effective operational and prev maintenance sys shall be employed on all aspects of the process where any failure could impact on the environment.

1	Are there documented operating procedures for operations that may have an adverse impact on the environment?	Yes	2.0	2.0		
2	Is there a defined procedure for identifying reviewing and prioritising items of plant for which a preventative maintenance regime is appropriate?	Yes	2.0	2.0		
3	Are there documented procedures for monitoring emissions or impacts?	Yes	2.0	2.0		
4	Is there a preventative maintenance programme for those items of plant whose failure could lead to impact on the environment?	Yes	1.0	1.0		
5	Does the preventative maintenance programme include regular checks and formal inspections of 'static' items such as tanks, pipework, retaining walls, bunds and ducts?	Yes	1.0	1.0		
6	Do the operations and maintenance systems include auditing environmental performance?	Yes	2.0	2.0		
7	Are the reports, results and recommendations arising from audits made available to senior management on a regular basis?	Yes	2.0	2.0		
8	In the last two years, has there been any notifiable incident or release for which lack of maintenance was a contributory cause?	No	-2.0	0.0		
9	In the last two years, has there been any notifiable incident or release for which the root cause could not be identified?	No	-3.0	0.0		
Operations and Maintenance Total			12.0	12.0	100.0%	2.0

Competence and Training - 20%

The Operator shall ensure that all relevant management and operational staff (including contractors and those responsible for purchasing equipment and materials) receive adequate training with regard to their responsibilities under the Permit.

Particular attention should be given to the following:

Minimisation of all potential environmental effects from operation under normal, abnormal, start up and shut down circumstances;

Prevention of accidental emissions and action to be taken when accidental emissions occur; and

The need to report deviation from the permit.

1	Has a training needs assessment been carried out which: Identifies all posts for which specific environmental awareness training is required; and Identifies the scope and level to which such training is to be given?	Yes	3.0	3.0		
2	Are training systems in place for all relevant staff that cover the following factors:					
	the regulatory requirements associated with the Permit as they affect their work activities and responsibilities;	Yes	2.0	2.0		
	likely potential environmental impacts which may be caused by plant under their control. This should cover both normal and abnormal circumstances;	Yes	2.0	2.0		
	reporting procedures to inform supervisors or managers of deviations from permit conditions;	Yes	1.0	1.0		
	procedures to be used by supervisors or managers and for the reporting of deviations from permit conditions to the Agency; and	Yes	2.0	2.0		04/06/2008

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	prevention of accidental emissions and action to be taken when accidental emissions occur?	Yes	2.0	2.0		
3	Are the skills and competencies necessary for key posts documented and are records of training needs and training received maintained?	Yes	1.0	1.0		
4	Do the key posts include contractors, those responsible for liaising with contractors and those purchasing equipment and materials?	Yes	1.0	1.0		
5	Do you assess the potential environmental risks posed by the work of contractors and provide instructions to contractors about protecting the environment while working on site?	Yes	1.0	1.0		
6	In the last 2 years, have there been any notifiable incidents or releases, which it has been identified that lack of training was a contributory cause ?	No	-2.0	0.0		
7	If there industry standards for training in this sector (e.g. WAMITAB) if so do you apply them? (If no industry standards please leave blank)	Yes	-2.0	0.0		
8	Are individual and organisational training needs reviewed on a regular (e.g. annual) basis?	Yes	2.0	2.0		
Competence Training Total			17.0	17.0		

Emergency planning - 20%

<p>The Operator shall maintain an accident management plan which identifies potential events or failures which might lead to an environmental impact. The plan shall identify:</p> <p>the likelihood of, and the actions to be taken to minimise, these potential occurrences;</p> <p>the environmental consequences and an action plan to deal with such occurrences;</p> <p>The Operator shall have a written procedure for handling, investigating, communicating and reporting of incidents and actual or potential non-compliance with permit conditions including taking action to mitigate any impacts caused and for initiating and completing corrective action.</p> <p>In the case of abnormal emissions the operator shall investigate and undertake remedial action immediately;</p> <p>promptly record the events and actions taken; and</p> <p>ensure the Regulator is made aware, as soon as practicable.</p>						
1	Is there an accident plan that complies with the guidance covering the following aspects of foreseeable scenarios: likelihood, consequences, actions to prevent, action to take in the event it occurs?	Yes	4.0	4.0		
2	Has the plan identified areas where improvement is needed?	Yes	1.0	1.0		
3	Where improvement has been identified, does the plan include an implementation programme with acceptable timescales to the Agency? If not, 2 points will be deducted.	Yes	-2.0	0.0		
4	Are there written procedures for handling, investigating, communicating and reporting actual or potential non compliance with operating procedures or emission limits?	Yes	1.0	1.0		
5	Are there written procedures for handling, investigating, communicating and reporting environmental complaints?	Yes	1.0	1.0		
6	Are there written procedures for investigating incidents, (and near-misses) including identifying suitable corrective action and following up implementation of that action?	Yes	2.0	2.0		
7	In the last 2 years, have there been any notifiable incidents or releases for which it has been identified that lack of emergency planning was a contributory cause ?	No	-2.0	0.0		04/06/2008

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8	Are there audit records of investigations into non compliance, complaints and incidents? Does the audit cover follow up actions? Do the audit reports go to senior managers?	Yes	3.0	3.0		
Emergency planning Total			12.0	12.0		

Organisation - 40%

The following aspects of site management procedures and controls may not be in the permit conditions but are likely to have an impact on the Agency resources required to apply the PPC Regulations

1	Do you operate an externally audited environment management system, if so answer one of the following questions. N.B Please enter your Certificate Number, Name of certification body and their UKAS Registration Number in the space for document reference.					
1.1	Is your Environmental Management System EMAS registered? If yes select Y and go to question 4.	No	20	0		
1.2	Is your Environmental Management System certified to ISO 14001? If yes enter Y and go to questions 3 and 4.	Yes	15	15		
1.3	Is your system an Environmental Management System subject to external audit through a third party audit programme with a published methodology (excludes in-house company audit programme). If yes enter and go to questions 3 and 4.		12	0		
Sub Total			Max 20	15.00		
2	If you do not operate an externally audited environmental management system then assess your system against the criteria below:					
2.1	Has your company adopted an environmental policy and programme which :					
	includes a commitment to continual improvement and prevention of pollution?		1.0	0.0		
	includes a commitment to comply with relevant legislation, and with other requirements that the organisation subscribes to?		1.0	0.0		
	identifies, sets, monitors and reviews environmental objectives, independently of the permit?		1.0	0.0		
2.2	Are there procedures that incorporate environmental issues into the following areas (as supported by demonstrable evidence e.g. written procedures):					
	the control of process change on the installation;		1.0	0.0		
	design and review of new facilities (including provision for their decommissioning), engineering and other capital projects;		1.0	0.0		
	capital approval;		1.0	0.0		
	purchasing policy;		1.0	0.0		
2.3	Are there audits, at least annually, to check that all activities are being carried out in conformity with the above requirements?		1.0	0.0		
2.4	Are they independent? (name the auditing body)		2.0	0.0		
2.5	Are there reports annually on environmental performance, objectives and targets, future planned improvements and or facilitate (participate in) local community liaison meetings?		1.0	0.0		
3	Does your company produce a public environmental statement? You may score in this box for ISO 14001 and industry systems but not for EMAS as this is a requirement for EMAS.	No	1.0	0.0		

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4	Within the past 5 years have you failed to meet an improvement condition either set by the Agency in a Permit or Variation by the due date, without prior agreement? (minus 2 for each failure). ADD NUMBER OF FAILURES NOT Y OR N		-2.0	0.0		
Organisational Totals			20.0	15.00		

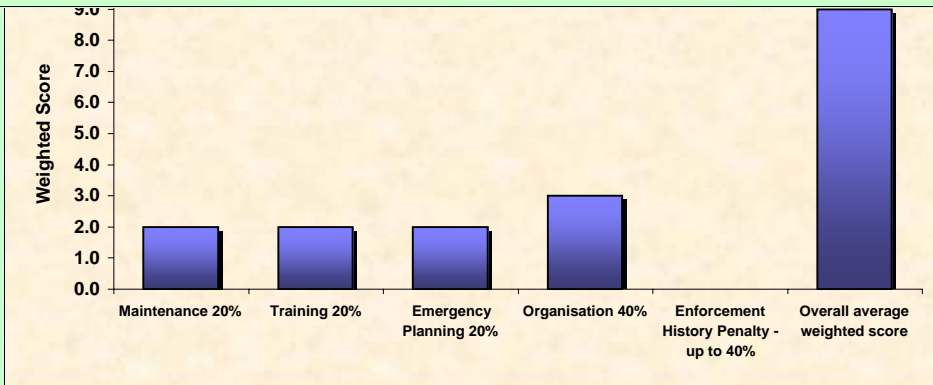
Enforcement History (0 to -40% weighting)

				Notice etc	Date Issued	Date Spent
1	Enforcement , Improvement or Works Notices issued in the past year by the Environment Agency under any legislation by the Health and Safety Executive relevant to the COMAH Regulations or by local authorities under Part I of the Environmental Protection Act 1990 or relevant notice or Abatement Notices issued by local authorities or magistrates courts under Part III of the Environmental Protection Act 1990 (in all cases, other than any overturned on appeal by the Operator)	0	None 0 1st - 5 2nd -10 3rd or more -40			
2	Formal cautions issued by the Environment Agency in respect offences under any legislation in the last 3 years.	0	None 0 1st - 5 2nd -10 3rd or more -40			
3	Prohibition, Suspension or Revocation Notices issued by the Environment Agency under any legislation, by the Health and Safety Executive relevant to the COMAH Regulations or by local authorities under Part I of the Environmental Protection Act 1990, (other than any overturned on appealed by the Operator) in the last 3 years	0	None 0 1st - 10 2nd or more -40			
4	Convictions on prosecutions brought by the Environment Agency under any legislation, by the Health and Safety Executive relevant to the COMAH regulations or by local authorities (in respect of offences under Parts I or III of the Environmental Protection Act 1990) in last 5 years (in last 10 years where a term of imprisonment was imposed on the Operator) (other than any overturned on appeal) [NB each individual offence counts separately].	0	None 0 1st - 15 2nd or more -40			

Enforcement History Total					If score is -40 please refer to Methodology page 24
	Entered	Spent	Extant	Score	
1 Enforcement or Works Notices	0	0	0	0	
2 Formal Cautions	0	0	0	0	
3 Prohibition, Suspension or Revocation Notices	0	0	0	0	
4 Convictions on Prosecutions	0	0	0	0	
Enforcement History Total (min -40)				0	

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Band E= less than 2
D= 2 to 3.99, C= 4 to 5.99, B= 6 to 7.99 , A= 8 to 11

BAND=

A

Company : Envirosol - Brownhills

Permit: 0

Data calculations generating the above graph

Summary	Max	Score from above	Normalised to scale out of 10	Weighting	Weighted score
Maintenance 20%	12.00	12.00	10.00	20.00	2.0
Training 20%	17.00	17.00	10.00	20.00	2.0
Emergency Planning 20%	12.00	12.00	10.00	20.00	2.0
Organisation 40%	20.00	15.00	7.50	40.00	3.0
Enforcement History Penalty -up to 40%	-40.00	0.00	0.00	40.00	0.0
Overall average weighted score					9.0