SEPA COMPILIANCE ASSOSSMENT  TO STATE OF THE PROPERTY OF THE P	Annex1 Pollution Pre	evention a	nd Con	trol (PPC) - com	plex licences					
Management   Man				, , , , , , , , , , , , ,						
Company of the Comp		ssessmen	it							
Accordance (1985)  1. Care among a control (1985)  1. Care amo	Site name:									
Exceptional Intelligence   Composition of the Compo	Completed by:									
Comparison   Com	Date:									
Land Anglorist Click  C	Environmental limits									
The control of the co	ELC parameter		Data source	No breaches		Repeated minor breaches or events	Gross breach	Significant breach(es)	Comment	s
The companies and analyses analyses and analyses and analyses and analyses analyses and analyses analyses and analyses analyses and analyses analyses analyses analyses and analyses	List of typical ELCs:	oonanion no.			on the one of the order					
proception for the control of the co	Scope ELCs									
According to Complete with Economic Part (Complete With Economic Part (Com	Description of activity and	1.1.1-1.1.3.3	Inspections		n/a	n/a	n/a			
Suggested collisis  Completer with Tomas  Co	Numeric ELCs (Single Threshold)							boundary		
Semantic and adults  Complicity with location  Complicity with locatio	Air ELVs, numerical	Various, typically		Compliant with licence	Exceeds licensed limits		More than twice licensed limit	Causes Category 1 (major) or		
the factor between contacting and processes		4.1.1 0.0								
the factor between contacting and processes				O	Formande the Bernard Park host in Land	One lead on table (Table 4) for some horse	Consider the Research Resta	0		
Complant with border	Suspended solids			Compliant with licence		of minor breaches constituting	Exceeds twice the licensed limit	Category 2 (significant)		
He limits  Complaint with locate  Complaint w						repeated minor breaches.		environmental event		
He limits  Complaint with locate  Complaint w	Biological oxygen demand (BOD)			Compliant with licence	Exceeds the licensed limit but is less	See look-up table (Table 4) for number	Exceeds twice the licensed limit	Causes Category 1 (major) or		
As applicant services of the control	Diological oxygen demand (DOD)					of minor breaches constituting		Category 2 (significant)		
As specificant discovered and plants  Originate with isomore  Originate with i						repeated minor preaches.		environmental event		
Notice of commonly collect	pH limits			Compliant with licence	Less than 1 pH unit change from limit					
Where set complete set of complete with licence of complete with licence of complete with licence of complete set of complete							from limit			
Nomeric examinate ELC2    Comparison of Community and Community Co										
Note in the continue of the co	Noise	Where set normally sched 3		Compliant with licence	Breach of licence condition	Four or more minor breaches		Causes Category 1 (major) or Category 2 (significant)		
Process ELC (and b)  Recognition on chemicals and values  Complaint with licence  Consider y limped or construction  Consider y limped or considere  Consider y limped or consider							,			
Process ELC (and b)  Recognition on chemicals and values  Complaint with licence  Consider y limped or construction  Consider y limped or considere  Consider y limped or consider	Mumaria atati-11-1-1-1-1									
Process ELCs (2-Miler - Markey solids of the complaint with licence of the complaint with licenc										
Storage limits on chemicals and various Compliant with license Ecoceds licensed limits Four or more minor breaches report such used allows the composition of compliant with license Ecoceds licensed limits Four or more minor breaches report such used allows the composition of compliant with license Ecocedistria.    Storage locations (wester)   Various   As specified in license   Storage or Indianal Properties   Pour or more minor breaches   As above   Cassas Category 1 (major) or composition of compliant with license   Storage or Indianal Properties   Pour or more minor breaches   As above   Cassas Category 1 (major) or composition or compliant with license   Storage or Indianal Properties   Pour or more minor breaches   As above   Cassas Category 1 (major) or composition   Pour or more minor breaches   As above   Cassas (allegory 1 (major) or composition   Pour or more minor breaches   As above   Cassas (allegory 1 (major) or composition   Pour or more minor breaches   As above   Cassas (allegory 1 (major) or composition   Pour or more minor breaches   As above   Cassas (allegory 1 (major) or composition   Pour or more minor breaches   As above   Cassas (allegory 1 (major) or composition   Pour or more minor breaches   As above   Cassas (allegory 1 (major) or composition   Pour or more minor breaches   As above   Cassas (allegory 1 (major) or composition   Pour or more minor breaches   As above   Cassas (allegory 1 (major) or composition   Pour or more minor breaches   As above   Cassas (allegory 1 (major) or composition   Pour or more minor breaches   As above   Cassas (allegory 1 (major) or composition   Pour or more minor breaches   As above   Cassas (allegory 1 (major) or composition   Pour or more minor breaches   As above   Cassas (allegory 1 (major) or composition   Pour or more minor breaches   As above   Cassas (allegory 1 (major) or composition   Pour or more minor breaches   As above   Cassas (allegory 1 (major) or composition   Pour or more minor breaches   Pour or more minor breaches   Pour or more	none listed Process ELC (a and b)									
Storage locations (waste)  National District of Storage Income (waste)  National District of Incom	Storage limits on chemicals and	Various		Compliant with licence	Exceeds licensed limits	Four or more minor breaches	Failure to monitor or submit a			
Storage locations (waste)  Natious  As specified in incince  Streach of licence condition  Four or more minor breaches  As above  Causes Category 1 (ange) or circles (ange) 1 (ange) 1 (ange) 1 (ange) 1 (ange) 2	waste						report which would allow the	Category 2 (significant)		
Caregory 2 (gigificant event								CHVII CHIII CHELI CVCIII		
Caregory 2 (gigificant event										
Caregory 2 (gigificant event	Storage locations (waste)	Various		As specified in licence	Breach of licence condition	Four or more minor breaches	As above	Causes Category 1 (major) or		
Smoke, visible plume Various Compliant with licence Compliant with l	otorage rocations (waste)	vanous		As specified in floorice	breach of hochec condition	Tour or more minor breaches	AS above	Category 2 (significant)		
Critegory 2 (applicant) environmental event en								environmental event		
Offensive adour  Schodule 3  Compliant with icence  Schodule 3  Compliant with icence  Schodule 3  Compliant with icence  Consideration  Conside	Smoke, visible plume	Various		Compliant with licence	Breach of licence condition	Four or more minor breaches	As above	Causes Category 1 (major) or		
Process ELCs (c)-Water - descriptive conditions:  No significant oil  No significant cell  No significant sewage solids  No si										
Process ELCs (c)-Water - descriptive conditions:  No significant oil  No significant cell  No significant sewage solids  No si										
Process ELCs (c)-Water - descriptive conditions:  No significant oil  No significant oil  No significant oil  No significant sewage solids  No significant sewage solids  No significant discoloration  Inspection  No significant discoloration  Inspection  No significant sewage fungus  No significant sewage	Offensive odour	Schedule 3		Compliant with licence	Breach of licence condition	Four or more minor breaches	As above			
No significant oil  No significant sewage solids  No significant sewage solids  No significant sewage solids  No significant discoloration  Inspection  Inspection  No significant discoloration  No significant discolo										
No significant oil  No significant sewage solids  No significant sewage solids  No significant sewage solids  No significant discoloration  Inspection  Inspection  No significant discoloration  No significant discolo										
Revironmental event.   Continuous oil sheen in discharge and downstream, or presence of oil in stores and significant discharge and downstream, or presence of oil in stores and significant distance).   Equivalent to a category for 2 environmental event.   Smothering of stream bed around outfall and or significant solids identifiable downstream.	descriptive conditions:						As above			
Revironmental event.   Continuous oil sheen in discharge and downstream, or presence of oil in stores and significant discharge and downstream, or presence of oil in stores and significant distance).   Equivalent to a category for 2 environmental event.   Smothering of stream bed around outfall and or significant solids identifiable downstream.	No significant oil			No significant oil				Equivalent to a category 1 or 2		
No significant sewage solids   No significant sewage solids   No significant discoloration   Inspection   No significant discoloration   Inspection   No significant discoloration   No significant discoloration   No significant discoloration   No significant foaming   No significant sewage fungus   No significan								environmental event.		
No significant sewage solids   No significant sewage solids   No significant discoloration   No significant discoloration   Inspection   No significant discoloration   Inspection   No significant discoloration   No significant foaming   No significant foaming   No significant foaming   No significant sewage fungus   No significant sewage								discharge and downstream, or		
No significant sewage solids  No significant sewage solids  No significant discoloration  Inspection  Inspection  No significant discoloration  No significant discoloration  No significant foaming								vegetation downstream (for a		
Inspection   Inspection   No significant discoloration   No significant foaming   No significant sewage fungus   No significant sewage fungus or furth of fungus visible over greater than one river width downstream.   Significant function   No environmental event (category of the caused by discharge in functional place of the caused by discharge in full compliance with licensed conditions (e.g. date which is not accounted foodilings (e.g. date which is not accounted foodilings)   Significant foodilings (e.g. date which is not accounted foodilings (e.g. date which is not accounted foodilings)   Significant foodilings (e.g. date which is not accounted foodilings (e.g. date which is not accounted foodilings)   Significant foodilings (e.g. date which is not accounted foodilings)   Significant foodilings (e.g. date which is not accounted foodilings)   Significant foodilings (e.g. date which is not accounted foodilings)   Significant foodilings (e.g. date which is not accounted foodilings)   Significant foodilings (e.g. date which is not acco	No. of the Mineral Control of the Co			No almost and				significant distance).		
No significant discoloration   Inspection   No significant discoloration   No significant foaming   No significant sewage fungus   No significant	NO significant sewage solids			ivo significant sewage solids				environmental event.		
No significant discoloration  Inspection  No significant discoloration  No significant foaming  No significant foaming  No significant sewage fungus  Fequivalent to a category 1 or 2 environmental event. Bed of stream blanketed with sewage fungus or vites of fungus visible over greater than one river width downstream.  Environmental Events (classified according to table 5)  Environmental harm  Inspection / significant category 1 or 3 significant (category 3) which is not caused by discharge in full compliance with licensed conditions (e.g. due to a spillage on site et and which is not accounted to effects and which is not accounted conditions (e.g. due to a spillage on site et and which is not accounted to effects and which is not accounted to effect and which is not accoun								Smothering of stream bed around outfall and or significant		
Inspection  No significant foaming  No significant foaming  No significant foaming  No significant sewage fungus  Fuquivalent to a category 1 or 2 environmental event widh sewage fungus or tufts of through sewage fungus or tuf								solids identifiable downstream.		
Inspection   No significant foaming   No significant sewage fungus   No significant sewage fungus visible   No significant sewage fu	No significant discoloration			No significant discoloration						
No significant foaming  No significant foaming  No significant sewage fungus  Sequivalent to a category 1 or 2 environmental event. Bed of stream blanketed with sewage fungus or turts of the stream blanketed with sewage fungus over greater than one river width downstream.  Sequivalent to a category 1 or 2 environmental event. Bed of stream blanketed with sewage fungus over greater than one river width downstream.  Sequivalent to a category 1 or 2 environmental event (category environmental event which is not caused by discharge in full compliance with licensed conditions (e.g. due to a spillage on site etc) and which is not accounted for selesphere.			Inspection			N/A		Discoloration visible for a		
No significant sewage fungus   No significant sewage fungus   Equivalent to a category 1 or 2 environmental event. Bed of stream blanketed with sewage fungus or tuts of fungus visible over greater than one river width downstream.								river width downstream.		
No significant sewage fungus  No significant sewage fungus  No significant sewage fungus  No significant sewage fungus  Equivalent to a category 1 or 2 environmental event. Bed of stream blanketed with sewage fungus or turts of fungus visible over greater than one river width downstream.  Environmental Events (classified according to table 5)  Environmental harm  Inspection / environmental harm  Inspection / environmental event ( category Four or more minor breaches or significant (category 1) or significant (category 2) environmental event which is not caused by discharge in full compliance with licensed conditions (e.g. due to a spillage on site etc) and which is not accounted for elsewhere.	No significant foaming			No significant foaming				Equivalent to a category 1 or 2		
No significant sewage fungus  No significant sewage fungus  No significant sewage fungus  No significant sewage fungus  Equivalent to a category 1 or 2 environmental event. Bed of stream blanketed with sewage fungus visible over greater than one river width downstream.  Environmental Events (classified according to table 5)  Environmental harm  Inspection / environmental harm  Inspection / environmental event ( category Four or more minor breaches SIAM Major (category 1) or Significant (category 2) environmental event which is not caused by discharge in full compliance with licensed conditions (e.g. due to a spillage on site etc) and which is not accounted for elsewhere.								difference downstream		
Environmental Events (classified according to table 5)  Environmental harm  Inspection / No environmental harm all events (classified according to table 5)  Environmental harm  Inspection / No environmental according to table 5  Environmental harm  Inspection / Inspection / environmental according to table 5  Environmental events (category Four or more minor breaches and provided to a splingle on site etc) and which is not accounted for elsewhere.  Environmental event (category Four or more minor breaches and provided to a splingle on site etc) and which is not accounted for elsewhere.								compared to upstream.		
Servironmental Events (classified according to table 5)   Servironmental harm   Inspection / environmental harm   Inspection / environmental harm   Inspection / environmental harm   Inspection / environmental event (category Four or more minor breaches   N/A   Major (category 1) or Significant (category 2) environmental events   Significant (category 2) environmental event which is not caused by discharge in full compliance with licensed conditions (e.g. due to a spillage on size etc) and which is not accounted for elsewhere.	No significant sewage fungus			No significant sewage fungus						
Environmental Events (classified according to table 5)  Environmental harm  Inspection / environmental a event s al events  Inspection / environmental a event s al events  Inspection / environmental a event s al events  Inspection / environmental event (category four or more minor breaches or significant (category 1) or significant (category 2) environmental event which is not caused by discharge in full compliance with licensed conditions (e.g. due to a spillage on site etc) and which is not accounted for elsewhere.								stream blanketed with sewage		
Environmental Events (classified according to table 5)  Environmental harm  Inspection / environmental harm  Inspection / environmental harm  Inspection / environmental event (category Four or more minor breaches N/A Major (category 1) or Significant (category 2) in full compliance with licensed conditions (e.g. due to a spillage on site etc) and which is not accounted for elsewhere.								fungus or tufts of fungus visible		
Environmental harm  Inspection / No environmental harm  Inspection / environmental harm  Inspection								width downstream.		
Environmental harm  Inspection / No environmental harm  Inspection / environmental harm  Inspection	Environmental Events (classified									
environment a) which is not caused by discharge in full compliance with licensed events  discharge is full compliance with licensed conditions (e.g. due to a spillage on site etc) and which is not accounted for elsewhere.	according to table 5)		lana and	No on iron most -1 h	Minor androne and the second	Four or more miner becaute	N/A	Major (astegon / 1)		
al events in full compliance with licensed environmental event which is conditions (e.g. due to a spillage on site etc) and which is not accounted site etc) and which is not accounted confiliance with licensed confiliance and not accounted confiliance and not accounted confiliance and not accounted	Environmental harm			INO environmental harm	3) which is not caused by discharge	Four or more minor breaches	N/A	Significant (category 2)		
site etc) and which is not accounted compliance with licensed for elsewhere.										
Overall ELC band										
	Overall ELC band									

]

	_						
Environmental manageme		Compliant	Minor non a-milion	Major way agent the same	Community		
EMC attribute	Applicable to this site? /	Compliant	Minor non-compliance	Major non-compliance	Comments		
	Licence						
	condition no.						
Management							
		Relevant staff have a detailed	Current permit difficult to obtain.	Current permit unobtainable			
staff		knowledge of the permit and/or its requirements (eg	Only the 'responsible' person deals				
		through written procedures)	with permit issues				
		and operate the procedures to ensure compliance with					
		the permit. It is good practice					
		to train all relevant (including operational) staff on the					
		regulatory implications of the					
Permit implementation plan		Appropriate implementation	Implementation plan is limited in	No implementation plan	May not be required in all cases; would expect to see an implementation plan for installation with new or extensively		
		plan in place; it is properly resourced and monitored.	scope or is poorly resourced for achievement.		changed permits. To include upgrades.		
Managerial structure / commitment		Effective EMS in place that	EMS in place, but is incomplete or	No EMS			
		includes an environmental policy and programme, and a	inappropriate for the installation (ie overly simplistic for a complex	No / limited procedures exist to ensure			
		commitment by the operator	activity). EMS may not be fully	compliance with the permit.			
		to continual improvement and prevention of pollution.	effective or there is no evidence of the operator committing to it.	No commitment to environmental			
				compliance			
		EMS identifies and sets the management structure	No clear allocation of responsibilities for environmental performance	Systems and procedures in place but			
		including the setting,	including compliance with permit.	unfit for purpose or are not used.			
		monitoring and review of environmental objectives	Environmental policy available but				
		(including compliance with	compliance/commitment not evident.				
		permit conditions) and key performance indicators.	Defined management structure but				
			limited organisation commitment to				
		Operator has demonstrable procedures (eg written	permit compliance.				
		instructions) that incorporate					
Staffing		environmental considerations EMS contains assessment of	EMS recognises requirement for	No assessment of required minimum		$\rightarrow$	
		minimum required staffing levels to manage and	assessment of staffing levels but no formal assessment has been	staffing levels			
		mitigate environmental risks	undertaken.	Installation operated with low level of			
		involved in operation of	Occasionally the installation operates	staffing such that environmental risk cannot be reduced or mitigated.			
		installation.	Occasionally the installation operates with lower levels of staffing than				
		EMS contains procedures and actions to take in the	required	Staff are not competent in their role.			
		event of staffing levels falling		Contractors/visitors not properly			
		below the minimum required.		controlled/supervised.			
		Staff are competent in their					
		required roles.					
Continuous improvement		Demonstration that incidents	Limited demonstration that	Evidence that operations and/or	A good EMS will have at its core drivers to improve. Evidence of		
		near misses, trends, results of audits and other	information is used or there is a commitment to continuous	management systems are deteriorating (eg the number of near	making use of information obtained from operations, checks and audits should be available to allow a		
		information is being used to	improvement	misses, breakdowns, etc. are	demonstration of not only a commitment to continuous		
		improve the overall performance of the		increasing rather than being stable or decreasing).	improvement but also translating that commitment into positive actions.		
		installation.		-			
		Management periodically					
		carry out assessments against Best Available					
		Techniques (BAT)					
		requirements and implement					
Internal / external audits undertaken		Audits are carried out, at least annually, to check	Audits undertaken but not necessarily annually or are limited in scope; or	No audits or checks are undertaken.			
		activities are being carried	although undertaken are not recorded				
		out in conformity with the permit requirements and any	fully.				
		EMS in place. Reports are					
		available and demonstrate compliance against					
		environmental objectives etc.					
		(Ideally such reports should be published.)					
		Follow-up actions to audits undertaken immediately					
Training		Training should include the	Some general environmental training	No environmental training available.			
		EMS and written procedures including operational	given.	No assessment of training needs			
		procedures and those	Some basic training requirements	made.			
		associated with a breach of permit condition, prevention	identified and given.	No training/induction of			
		of accidental emissions and	Limited environmental training	contractors/visitors.			
		actions to be taken when accidental emissions occur.	available to managers.				
			Training of contractors/visitors limited.				
		All relevant staff have training needs identified and					
		are receiving relevant training in accordance with their job					
		function to ensure suitable					
		competence.					
Monitoring and control systems /		All managers have Documented operating	Frequent process deviations.	No management of change system in			
procedures		procedures for process		place.			
		operations are in place and used effectively (including	Management of change procedure prepared but not used.	No system to change operations due			
		emission monitoring		to complaints, near misses or			
		systems) to monitor on a regular basis the	Poor control of process operations, shift handovers or non-routine	incidents.			
		performance against the	operations.	Ongoing process deviations.			
		permit.		Very poor control of process			
		Responsible		operations, shift handovers or non-			
		person/managers aware of all environmental effects from		routine operations.			
		operation under normal and		No / poorly written procedures or			
		abnormal circumstances.		instructions where they have been deemed necessary.			
		Infrequent process					
							1
		deviations.					

]

Emergency response procedures /		Emergency response	Limited accident plan in place with	No emergency response procedures.		
accident plans / response to incident (short term)		procedures in place that clearly identify environmental implications and actions to take with suitable testing regime.	minimal risk assessment of foreseeable scenarios and actions taken to mitigate potential occurrences and/or impacts.	No / ineffectual response to incidents.		
		Accident plan in place that includes risk assessments of foreseeable scenarios to minimise potential	Limited response to incident to stop release but with little or no follow-up to remediate any impacts.			
		occurrences and/or impacts.  Incident information is used to prevent repetition of				
		incidents.  Near miss reporting is used to proactively control incident				
		avoidance.  Accident plans include approach to community				
Plant and infrastructure		relations				
Condition and operation of plant,		Plant and equipment	Some plant and equipment subject to			
equipment and infrastructure		operated without frequent breakdown or is operated without release to the environment outwith the	frequent breakdowns and/or operation leads to minor releases outwith scope of permit.	leads to releases to the environment outwith the scope of the permit.		
		scope of the permit.  Site infrastructure fit for purpose.	Site infrastructure has minor defects which may contribute to pollution impact.	Site infrastructure (eg bunding, drains, interceptors, etc.) not fit for purpose.		
Monitoring equipment		Monitoring equipment required by permit installed and operating with few, if any, breakdowns.	Monitoring equipment required by permit installed but unreliable and subject to frequent breakdowns.	Monitoring equipment required by permit not installed or not working for extended periods of time.		
Maintenance of processes, plant and installation to relevant standards		Maintenance programme in place and implemented.	Maintenance programme not fully implemented.	High frequency of breakdowns/ maintenance resulting in environmental incidents.		
		Maintenance programme takes into account environmental effects of breakdowns and	Maintenance programme based on shutdown periods but little or no basic preventative maintenance (lubrication/cleaning) occurs between			
		maintenance operations.  Maintenance programme	times.  Some modifiable uncontrolled	No coherent maintenance programme in place.		
		contains systems to analyse faults and to prevent recurrences.	releases resulting due to plant breakdown and maintenance activities.	Equipment performance deteriorates significantly between maintenance		
		Appropriate precautions in place to prevent pollution due to maintenance activities.	Limited recognition within permit to work systems of environmental issues associated with maintenance	activities.  No recognition of environmental issues within maintenance activities.		
		Uncontrolled releases due to plant breakdown and	associated with maintenance activities.	within maintenance activities.		
		maintenance activities are small and insignificant, not requiring notification to SEPA as an 'incident'.				
		Maintenance undertaken to a relevant standard.				
		Shutdown periods and preventative maintenance based on risk assessment or as a minimum on				
Maintenance plan for environmentally critical plant and instrumentation		List of environmentally critical equipment kept and updated.	List of environmentally critical plant kept but incomplete or not regularly updated.	No list of environmental critical plant.  No recognition of environmentally critical plant in maintenance		
		Environmentally critical plant and instrumentation defined and schedules in maintenance plan.	Not all environmentally critical plant on maintenance programme.	programme.		
Implementation of monitoring /		Required monitoring programmes undertaken on	Required monitoring programmes undertaken but not to the frequency	No ongoing calibration of monitoring		
testing / calibration programmes		time to the recognised or agreed standard	specified in the permit, or on time or not to a recognised standard.	equipment.  Required monitoring programmes not undertaken.		
Spare part availability		All relevant plant and equipment scheduled into a maintenance programme.	Spares not readily available.	No assessment of critical spare parts.  Frequent breakdowns and delays		
		Critical environmental plant spare parts held on site or easily available.		repairing plant due to lack of spare parts or delays in getting spare parts.		
Reporting and recording				1		
Record keeping		Records kept in systematic manner.  Records kept as specified in permit.	Some records not kept or do not comply with the requirements of the permit.	Failure to record a significant proportion of data required by the permit.		
		Records legible.				
Information and records available as required by licence		Information and records readily available.  Training records available.	Records and information available but incomplete or inadequate quality for compliance with permit.	Limited or non-existent monitoring records.		
		Permit information used to improve performance.	Limited use of information in process management.			
Reports to SEPA required under licence		Reports are prepared and submitted on time, in the format specified, and are of appropriate quality and content.	Reports are prepared but submitted late, or do not follow the format specified or are not of the appropriate quality and content.	Non-ELC reports are not prepared or submitted, or where any reports are submitted they are of very poor quality or content.		
Notification of incidents		Incidents are notified promptly and include the required information specified in the permit.	Notification of incidents is not consistent (ie some are notified but not all).	Incidents are not notified		
		Operator is proactive in discussing incidents and events.	Incident notifications do not comply with the information requirements specified in the permit.			
Overall EMC band						
Overell commit						
Overall compliance ban	d					

]

