

Annex1 Pollution Prevention and Control (PPC) - complex licences

SEPA Compliance Assessment								
SEPA licence no.:								
Site name:								
Annual summary sheet for year:								
Completed by:								
Date:								
Environmental limits								
ELC parameter	Typical licence condition no.	Data source	No breaches	Minor breach(es) or minor environmental event(s)	Repeated minor breaches or events	Gross breach	Significant breach(es)	Comments
List of typical ELCs:								
Scope ELCs								
Description of activity and geographic boundaries	1.1.1-1.1.3.3	Inspections		n/a	n/a	n/a	Activities outwith scope or boundary	
Numeric ELCs (Single Threshold)								
Air ELVs, numerical	Various, typically 4.1.1 etc		Compliant with licence	Exceeds licensed limits	See look-up table (Table 4) for number of minor breaches constituting repeated minor breaches.	More than twice licensed limit	Causes Category 1 (major) or Category 2 (significant) environmental event	
Suspended solids			Compliant with licence	Exceeds the licensed limit but is less than twice the licensed limit.	See look-up table (Table 4) for number of minor breaches constituting repeated minor breaches.	Exceeds twice the licensed limit	Causes Category 1 (major) or Category 2 (significant) environmental event	
Biological oxygen demand (BOD)			Compliant with licence	Exceeds the licensed limit but is less than twice the licensed limit.	See look-up table (Table 4) for number of minor breaches constituting repeated minor breaches.	Exceeds twice the licensed limit	Causes Category 1 (major) or Category 2 (significant) environmental event	
pH limits			Compliant with licence	Less than 1 pH unit change from limit	See look-up table (Table 4) for number of minor breaches constituting repeated minor breaches.	More than one pH unit change from limit		
Noise	Where set normally sched 3		Compliant with licence	Breach of licence condition	Four or more minor breaches	Monitoring or reporting failure only	Causes Category 1 (major) or Category 2 (significant) environmental event	
Numeric statistical ELCs								
none listed								
Process ELC (a and b)								
Storage limits on chemicals and waste	Various		Compliant with licence	Exceeds licensed limits	Four or more minor breaches	Failure to monitor or submit a report which would allow the licence holder to demonstrate compliance with a Process ELC	Causes Category 1 (major) or Category 2 (significant) environmental 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 Category 2 (significant) environmental event	
Smoke, visible plume	Various		Compliant with licence	Breach of licence condition	Four or more minor breaches	As above	Causes Category 1 (major) or Category 2 (significant) environmental event	
Offensive odour	Schedule 3		Compliant with licence	Breach of licence condition	Four or more minor breaches	As above	Causes Category 1 (major) or Category 2 (significant) environmental event	
Process ELCs (c)-Water - descriptive conditions:						As above		
No significant oil		Inspection	No significant oil		N/A		Equivalent to a category 1 or 2 environmental event. Continuous oil sheen in discharge and downstream, or presence of oil in stones and vegetation downstream (for a significant distance).	
No significant sewage solids			No significant sewage solids				Equivalent to a category 1 or 2 environmental event. Smothering of stream bed around outfall and or significant solids identifiable downstream.	
No significant discoloration			No significant discoloration				Equivalent to a category 1 or 2 environmental event. Discoloration visible for a distance of greater than one river width downstream.	
No significant foaming			No significant foaming				Equivalent to a category 1 or 2 environmental event. Significant difference downstream compared to upstream.	
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 tufts of fungus visible over greater than one river width downstream.	
Environmental Events (classified according to table 5)								
Environmental harm		Inspection / environmental events	No environmental harm	Minor environmental event (category 3) 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.	Four or more minor breaches	N/A	Major (category 1) or Significant (category 2) environmental event which is not caused by discharge is full compliance with licensed conditions and not accounted	
Overall ELC band								

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

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

