

Annex 2 Pollution Prevention and Control (PPC) Part B - low risk licences
 (eg dry cleaners, petrol vapour recovery (PVR), cement batchers, roadstone coatings etc)

SEPA Compliance Assessment

SEPA licence no.:	
Site name:	
Annual summary sheet for year:	
Completed by:	
Date:	

Environmental limits								
ELC parameter	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 - 1.1.3.1	Inspections		n/a	n/a	n/a	Activities outwith scope or boundary	
Numeric ELCs								
Solvent released per kg of clothes cleaned (annual average)			Compliant with licence	Exceeds licensed limits	n/a	More than twice licensed limit	Causes Category 1 (major) or Category 2 (significant) environmental event	Repeated minor breaches not possible if compliance based on annual average limit (eg for dry cleaning).
Numeric statistical ELCs								
none listed								
Process ELCs (a & b)								
No odour beyond site boundary			Compliant with licence	Breach of licence condition	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	
No visible emissions other than steam			Compliant with licence	Breach of licence condition	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	
Environmental Events (classified according to table 5)								
Environmental harm	1.11	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	Four or more minor breaches	N/A	Major (category 1) or Significant (category 2) environmental event which is not	

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		All staff know about permit and/or its requirements (e.g. through written procedures) and understand its implications.	Permit difficult to obtain. Only responsible person deals with permit.	Permit unobtainable	
Permit implementation plan	n/a	n/a	n/a	n/a	
Managerial structure / commitment		Management fully aware of how operations affect ELV compliance - reflected in written operating procedures.	Management aware of need to comply with ELV but no evidence in procedures.	No indication that management understands how operations affect ELV compliance.	Unlikely that any sort of written EMS will be present.
Staffing		All staff competent.	Competent staff present on site but untrained staff left unsupervised.	Staff not competent to run machines	
Continuous improvement	n/a	n/a	n/a	n/a	
Internal / external audits undertaken		Annual audit undertaken by external person (eg contract engineer and periodic inspections by shop owner or group regional/ H&S manager, etc.). Check is documented and available on site.	Checks sometimes less than one per year and/ or not formally recorded.	No annual check carried out.	
Training		Formal training for all operators (eg new SQA module for dry cleaners), staff understand implications of less than optimum plant running etc.	Only shop / plant manager has formal training. Toolbox talks carried out but not recorded.	No written records of any staff training, no evidence of even semi-formal toolbox talks.	Training is often informal for dry cleaners etc (passed down by word of mouth, but there should at least be some record of staff training).

Monitoring and control systems / procedures		Shop specific written operating procedures available and evidence that they are followed (eg ticklist).	No site specific written procedures but generic plant / machine manuals available and used.	No written operational procedures. Machine / plant manuals unavailable.	
Emergency response procedures and accident plans		Written procedures understood by all staff. Staff aware of spill kits and how to use them.	Written procedures, spill kits present but staff unaware / unsure how to use or respond.	No procedures or spill kits	
Plant and infrastructure					
Plant		Good standard of housekeeping; only infrequent plant operations / breakdowns which could have pollution potential.	Poor housekeeping, plant operating methods / breakdowns likely to lead to permit breaches.	Plant / machines regularly operated in manner leading to permit breach; very poor housekeeping.	Poor housekeeping indicated by, for example, liquids not in secondary containment, drains / interceptors blocked, floors very stained, significant dust coating over much of area, strong solvent odour in shop, etc.
Monitoring equipment		n/a	n/a	n/a	Some cement batchers may have monitoring systems. Most others unlikely to have own environmental monitoring equipment.
Maintenance of processes, plant and installation to relevant standards		Full annual, daily, weekly checks and maintenance carried out and recorded. Clear evidence of commitment to preventative maintenance.	Basic annual service etc carried out but daily / weekly / monthly machine / plant inspections as listed in manufacturer's manual not done regularly.	No regular plant / machine service or inspections required by permit carried out. No planned maintenance / check programme.	
Maintenance plan for environmentally critical plant and instrumentation		Evidence of plans and effort focused on environmentally critical plant	Recognition of environmentally critical plant, but no specific maintenance plan drawn up or implemented	No recognition of any environmentally critical plant	Some sites (eg dry cleaners) may not have any environmentally critical plant.
Implementation of monitoring / testing / calibration programmes		All required monitoring done to appropriate standard and fully recorded.	Required monitoring done but not always on time or to appropriate standard.	Required monitoring not carried out.	No environmental monitoring required for dry cleaners, PVRs.
Spare part availability	n/a	n/a	n/a	n/a	
Reporting and recording					
Record keeping		All required records kept up-to-date and are easily accessible; other records available (eg training)	Some records patchy / not always filled in.	Failure to record key data required by permit.	
Information and records available as required by licence	n/a	n/a	n/a	n/a	Most small sites only record information specifically required by licence / legally and other basic Best Available Techniques (BAT) information (eg simple training and maintenance logs).
Reports to SEPA required under licence		Information submitted on time and to appropriate quality and content.	Information submitted but not on time and of poor quality.	Non-ELC reports and notifications not submitted, or where any reports are submitted they are of poor quality and impossible to determine compliance.	
Notification of incidents		All incidents with potential environmental impact reported (including significant 'near misses').	Incident notification is patchy and not to appropriate standard and / or in good time.	Incidents leading to permit breach not notified.	
Overall EMC band					

Overall compliance band