



Risk Assessment Method for Local Air Pollution Control

Score Sheet

Name of authorised process/installation	BAE Systems Maritime - Submarines
Name of person with whom sheet discussed	Lee Ferguson
Process Guidance Note	PG 6/23 & 32
Local Authority Reference	PPC/B/05
Inspector's Name	Alison Coward/ Alice Cruse / Liam Casson
Date	7 th October 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 deadline has yet to be reached	5	
(B) Upgrading not yet complete and PG Note deadline has passed	10	
(C) Upgrading complete and meets BATNEEC Requirements	0	0
(D) Emissions control exceeds BATNEEC Requirements	-10	

Component 3 - Sensitivity and Proximity of Receptors (circle appropriate score)			
	Sensitivity of Receptors		
Proximity to Emission Source	(x) High	(y) Med	(z) Low
(A) < 100m*	20	12	5
(B) 100 - 250m*	12	10	3
(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.
Note: 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	0
(B) No such air pollution problems	0	0

Total for Environmental Impact Appraisal	Range 0 to 70	40
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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 authorisation condition or of the general/residual BATNEEC condition	0	0
(B) Incident leading to a justified complaint*	5 per incident	0
(C) Breach of authorisation not leading to formal action	10 per incident	0
(D) Incident leading to formal caution, Enforcement Notice or prosecution	15 per incident	0
(E) Incident leading to a Prohibition Notice or Suspension Notice	20 per incident	0
Total	(Max 50)	0

* Unjustified complaints may be e.g. those considered by the inspector to be unreasonable or which cannot be clearly linked to an incident at the process.

Scoring for Component 6 - Assessment of Monitoring, Maintenance and Records				
Criterion	Possible Scores			Score Awarded
	(x) Yes	(y) No	(z) N/A	
(A) All monitoring undertaken to the degree required in the authorisation?	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	5	0	5
(D) Fully documented and adhered to maintenance programme, in line with authorisation?	0	5	0	0
(E) Full documented records as required in authorisation available on-site?	0	5	0	0
(F) All relevant documents forwarded to the authority by date required?	0	5	0	0
Total Score	(-5 to 30)			5

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

Total for Operator Performance Appraisal	Range -10 to 105	30
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Overall Score for the Process	Range -10 to 175	70
Regulatory Effort Category High =>80, med = 40 – 80, low = <40	Low/Med/High	Med