

DEFRA LAPC Risk Assessment

Name of Permitted Installation: BAE Systems Submarines

Name of Person with whom Score Sheet discussed: Matt Roskell

Enter relevant scores for each component in blue "Score Awarded" boxes on the Environmental Impact and Operator Appraisal tables. The total score, category, required regulatory effort and number of inspections per year will be calculated and shown in the table below. DO NOT ENTER A SCORE DIRECTLY INTO THE REGULATORY EFFORT BOX

Regulatory Effort Score For Process	Regulatory Effort	Hours Per Year	Inspection/Visit*
	Category		
60	MEDIUM	18 to 30	1 full and 1 check inspection and extra inspections as necessary

ENVIRONMENTAL IMPACT APPRAISAL

Scoring For Component 1 - Inherent Environmental Impact Potential		
Risk Rating	Possible Score	SCORE AWARDED
(A) Category 1	10	20
(B) Category 2	20	
(B) Category 3	30	

Scoring For Component 2 - Progress With Upgrading		
Status Of Upgrading	Possible Score	SCORE AWARDED
(A) Upgrading Not Complete But PG Note Deadline Has Yet To Be Reached	5	0
(B) Upgrading Not Complete And PG Note Deadline Has Passed	10	

(C) Upgrading Complete And Meets BATNEEC Requirements	0	
(D) Emissions Control Exceeds BATNEEC Requirements	-5	

Scoring For Component 3 - Sensitivity & Proximity Of Receptors				SCORE AWARDED
Proximity To Emission Source	Sensitivity Of Receptors			
	(x) High	(y) Medium	(z) Low	
(A) < 100m	20	12	5	20
(B) 100 - 250m	12	10	3	
(C) 250 - 500m	5	3	1	
(D) >500m	0	0	0	
<i>NOTE: - All distances should be multiplied by a factor of 2 for mineral & cement + lime processes. Distances should be multiplied by a factor of 4 for combustion, incineration (not cremation), iron & steel + non ferrous metal processes. Distances should be measured from the process itself not the process boundary.</i>				

Scoring For Component 4 - Other Targets		SCORE AWARDED
	Possible Score	
(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	

OPERATOR PERFORMANCE APPRAISAL

Scoring Component 5 - Compliance Assessment		
Scale Of Non-Compliance	Possible Score	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 for	10 per incident	20
(D) Incident leading to formal caution, Enforc	15 per incident	0
(E) Incident leading to a Prohibition Notice	20 per incident	0
	Total (Max. 50)	20

- 1) VOC cleaning assessment outstanding.
- 2) Environmental Training for employees written, but not implemented

* 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.

Table A1.6: Scoring for Component 6 - Assessment of Monitoring, Maintenance and Records				SCORE AWARDED
Criterion	Possible Score			0
	(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	0
(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)			0
<i>1 These aspects relate to the operator's performance within the twelve months immediately preceding the assessment or review of the assessment. Failure to monitor to the degree required or to forward documents on time more than twelve months ago should be excluded.</i>				

Table A1.7: Scoring for Component 7 - Assessment of Management, Training and Responsibility				SCORE AWARDED
Criterion	Possible Score			0
	(x) Yes	(y) No	(z) N/A	
(A) Documented procedures in place for implementing all aspects of the authorisation?	0	5	0	0
(B) Specific responsibilities assigned to individual staff for these procedures?	0	5	0	0
(C) Completion of individual responsibilities checked and recorded by the company?	0	5	0	0
(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	0

(F) Is an 'appropriate' environmental management system in place?	-5	0	0	-5
Total Score	(-5 to 25)			0
<i>Note: In relation to the last criterion, when the relevant PG Note has been updated to include guidance on 'appropriate' management systems, processes should be scored zero (0) if such a system is in place and five (+5) if such a system is not in place. DEFRA and NAW envisage that guidance on appropriate management systems be standard in all of the next generation PG Notes (these will have effect by the end of 12 months from the date of publication of the relevant PG Note).</i>				

Matthew advised
that this has nearly
been completed on
a database but
some work still
required.