



## 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	Patrick Merchant
Process Guidance Note	PG 6/23 & 32
Local Authority Reference	PPC/B/05
Inspector's Name	Alison Coward, Alison Harker & Peter Carr
Date	20 April 2022

### Environmental Impact Appraisal

<b>Component 1 – Inherent Environmental Impact Potential</b>		
<b>APRR Risk Rating Category</b>	<b>Possible Scores</b>	<b>Score Awarded</b>
(A) Category 1	10	
(B) Category 2	20	20
(C) Category 3	30	

<b>Component 2 - Progress with Upgrading</b>		
<b>Status of Upgrading</b>	<b>Possible Scores</b>	<b>Score Awarded</b>
(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	

<b>Component 3 - Sensitivity and Proximity of Receptors (circle appropriate score)</b>			
	<b>Sensitivity of Receptors</b>		
<b>Proximity to Emission Source</b>	<b>(x) High</b>	<b>(y) Med</b>	<b>(z) Low</b>
(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.

<b>Component 4 – Other Targets</b>		
	<b>Possible Scores</b>	<b>Score Awarded</b>
(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

<b>Total for Environmental Impact Appraisal</b>	<b>Range 0 to 70</b>	<b>40</b>
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## Operator Performance Appraisal

<b>Component 5 - Compliance Assessment</b>		
<b>Scale of Non-Compliance</b>	<b>Possible Scores</b>	<b>Score Awarded</b>
(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
<b>Total</b>	<b>(Max 50)</b>	<b>0</b>

\* 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.

<b>Scoring for Component 6 - Assessment of Monitoring, Maintenance and Records</b>				
<b>Criterion</b>	<b>Possible Scores</b>			<b>Score Awarded</b>
	<b>(x) Yes</b>	<b>(y) No</b>	<b>(z) N/A</b>	
(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	5
(F) All relevant documents forwarded to the authority by date required?	0	5	0	5
<b>Total Score</b>	<b>(-5 to 30)</b>			<b>10</b>

<b>Component 7 - Assessment of Management, Training and Responsibility</b>				
<b>Criterion</b>	<b>Possible Scores</b>			<b>Score Awarded</b>
	<b>(x) Yes</b>	<b>(y) No</b>	<b>(z) N/A</b>	
(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	0
<b>Total Score</b>	<b>(-5 to 25)</b>			<b>25</b>

<b>Total for Operator Performance Appraisal</b>	<b>Range -10 to 105</b>	<b>35</b>
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<b>Overall Score for the Process</b>	<b>Range -10 to 175</b>	<b>75</b>
<b>Regulatory Effort Category</b> High =>80, med = 40 – 80, low = <40	<b>Low/Med/High</b>	<b>Med</b>