

**IPRI QUALITY SYSTEM**

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Title: PPC Site Compliance Assessment Reports (Inspections and Correspondence),  
Compliance Summary and Risk Assessment

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**AMENDMENT RECORD SHEET**

**PROCEDURE NUMBER QA004**

VERSION	AMENDMENT	DATE
0	First Issue	30/7/93
1	<ul style="list-style-type: none"> <li>(i) Title and page number corrected on amendment record sheet.</li> <li>(ii) New amendment record sheet format used.</li> <li>(iii) All pages have version number.</li> </ul>	28/1/94
2	<ul style="list-style-type: none"> <li>(i) Scope amended to indicate that the procedure relates to air pollution matters only.</li> <li>(ii) An informative added to 5.1 indicating that a registered file has been opened detailing registered works and the name of the lead Inspector.</li> <li>(iii) The requirement in 5.2.1 that the Chief Inspector has to sign and date all inspection reports has been removed.</li> </ul>	30/9/94
3	<ul style="list-style-type: none"> <li>(i) A new 5.1.1 inserted</li> <li>(ii) The previous 5.1 has been renumbered 5.1.2 and 5.1.3</li> </ul>	31/12/94
4	<ul style="list-style-type: none"> <li>(i) Title change to include site inspection</li> <li>(ii) Reference to an inspection checklist in 5.11 removed</li> <li>(iii) Reference to corrective action inserted in 5.2.3</li> </ul>	15/11/95
5	5.1.3 Has been amended to indicate that a new works listing will be produced when amendments arise and that the works listing will be dated.	10/1/96
6	Amendments following procedure review. ARCI changed to IPRI.	12/8/97
7	Para 3.1 amended to remove AR10/90 and to include AR46/94 and a new paragraph 5.1.3 inserted to indicate that follow up action will be confirmed in writing.	20/12/99
8	Procedure review – only minor changes carried out	30/5/01
9	4 year review – change of name to encompass IPC and PPC works, the reference to testing team changed to EHS – Lisburn, procedure amended to include public registers, the inclusion of the IPRI Central Data facility, the removal of named master files, the removal of reference to AR46/1994	20/2/06
10	Procedure review – EHS changed to NIEA, reference to IPC removed	20/05/09

VERSION	AMENDMENT	DATE
11	New section 5.2 included covering compliance assessment for non farm Part A installations	7/7/09
12	Title change. Amendments following procedure review including removal of sections on NIEA Check Monitoring Reports, Monitoring And Emission Data Reports Supplied by Operators and Environmental Monitoring Reports which are now included on QA 079, addition of Q4/2 - Q4/6 forms, addition of section 5.3 covering suspected PPC Permit breaches and addition of section 5.4 covering suspected breaches of EU Directives.	09/02/11
13	Title change. Complete review of procedure. Addition of Compliance Assessment Section on the CDA system for Part A (non-farms). Addition of Risk Assessment section on the CDA for Part A (non-farms). Removal of page 1 of Appendix 1. Update of remaining section of Appendix 1. Addition of Appendix 3 on guidance for rating non compliance at Part A installations.	11/09/2013
14	Title revised to include Risk Assessment. Complete update of procedure. Remove section 3.1, reference to PPC (NI) Regulations 2003. Addition of 3.2 and 3.3. Addition of 5.1.9, 5.1.9.1 and Q4/7 on Odour Assessment. Update 5.1.3, 5.1.4, 5.1.5, 5.1.6, 5.1.7, 5.1.8, 5.2.1, 5.2.2, 5.2.3, 5.2.4, 5.3.1, 5.4.1 and Appendix 3. Removed 5.1.2, 5.1.7, 5.2.6 and 5.2.7. Removed documents Q4/3 and Q4/5. Moved 5.2.8 to 5.2.3, 5.2.10 to 5.1.6, 5.2.11 to 5.1.7 and 5.2.12 to 5.1.8	07/07/2014
15	5.3.1 changed significant Non-compliance to Substantial Non-compliance	14/8/2014
16	A complete review of the procedure was carried out and the Title changed. 1.0 and 2.0 include summarising compliance and clarifying scope. 4.3 compliance period added. 5.1 new section title. 5.1.2 added unique identifier for CAR. 5.1.3 LM must approve not escalating I-NC to S-NC. 5.1.5 & 6 minor changes to wording. 5.1.7 removed and replaced by 5.1.8. 5.2.1-4 minor changes to wording. 5.2.5 pdf of Risk Assessment to be put on HPRM. 5.3.1 and 5.4.1 clarity over S-NC with reference to QA042. Appendix 3 Case review required for all S-NCs and I-NC does not need to be escalated to S-NC subject to LM approval. TRIM changed to EDMSthroughout procedure.	27/10/2017
17	A complete review of the procedure is necessary to implement DAERA records management processes.	30/04/2019
18	Following audit nos A999 the procedure was reviewed to change the way annual RAMs are managed and saved for future use.	22/07/2021

	Added 5.2.7 in relation to running / saving annual RAMS and use for determining risk categories.	
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## **1.0 Purpose**

The purpose of this procedure is to define the assessment of compliance with PPC Permit conditions throughout the year as well as summarising compliance and assessing risk at the end of the compliance cycle.

## **2.0 Scope**

This procedure covers the completion of a compliance assessment report (CAR) for all conditions in a PPC permit, (including inspections, correspondence, monitoring reports, incidents, etc.), the compliance summary and risk assessment reports.

## **3.0 References**

- 3.1 PPC - The Pollution Prevention and Control (Industrial Emissions) Regulations (Northern Ireland) 2013
- 3.2 NIEA Guidance - Odour Impact Assessment Guidance For Permitted and Licensed Sites
- 3.3 QA079 – Review/handling of PPC Installation Reports

## **4.0 Definitions**

- 4.1 CDA – Central Data Application
- 4.2 Inspection cycle – usually April to March but can be over a number of years (e.g. reviews of raw materials, waste minimisation etc).
- 4.3 Compliance period – usually April to March the following year but can be over a number of years where inspections are less frequent than annually.
- 4.4 EDMS – NI Civil Service computerised document records management system (TRIM / EDMS/ CM).

## 5.0 Procedure

### 5.1 Determining Compliance

- 5.1.1 Prior to any inspection the Inspector should review the previous site CAR, any reports, schedule 1's and information supplied between inspections and permit requirements to identify relevant issues. Over an inspection cycle the Inspector should aim to cover compliance with all aspects of the permit, especially any priorities for the relevant industrial sector.
- 5.1.2 For each inspection the appropriate IPRI PPC Compliance Assessment Report (Q4/2, Q4/4 or Q4/6) will be typed, dated, given a unique identifier for the year, (i.e. 201X/201Y-1,2,3 etc.) and include the name of the inspector. The report must specify the compliance or number and type of non compliances identified during the inspection or assessment of information and what follow-up action is required as a consequence, having regard for the guidance in Appendix 3.
- 5.1.3 If a non compliance from a previous inspection has not been completed within the specified timescale, it should be escalated to the next band of severity, (i.e. Minor to Intermediate and Intermediate to Substantial) subject to the reason for not correcting the issue. An inspector must obtain their line manager's approval if an intermediate non-compliance is not escalated to a substantial non-compliance, this should be noted on the front page of the next Compliance Assessment Report. (For substantial non-compliances refer to Section 5.3 below).
- 5.1.4 The Compliance Assessment Report must be saved in the relevant installation EDMS container as the official copy of the report. A copy of the Compliance Assessment Report will also be forwarded to the appropriate person at the installation. These reports can be made public upon receipt of a request.
- 5.1.5 Inspections for Part A, Part B and Part A farm permits need to cover the core elements in Appendix 1 as a minimum during the inspection cycle, so that the Compliance Summary and Risk Assessment score can be produced annually to determine inspection frequency. Appendix 2 details an expansion of the core elements for Part A non farm installations.
- 5.1.6 All core elements, (see Appendix 1 and 2), should be assessed over the inspection cycle regardless of the target number of inspections. Where relevant, assessment of compliance with odour and noise management plans should be included as core elements.

5.1.7 Information received through operator returns and check monitoring must be taken into account, particularly in relation to emissions compliance assessment, since an inspection will only cover a sample of data over one or two years. Inspections should normally focus on the operators approach to monitoring and quality assurance for emissions data along with checking a sample of the information recorded. Assessment of compliance with relevant standards such as UKAS, MCERTS requirements or BSEN14181 should also be included. The operator's emissions returns should give a fuller picture of compliance over the inspection cycle and should be recorded in the CDA system with the appropriate descriptor.

#### 5.1.8 **Odour Assessment**

5.1.8.1 Odour Assessments should be recorded on Q4/7 Odour Assessment Reporting Form. The completed form should be saved in the relevant installation EDMS container.

### 5.2 **Compliance Assessment Summary and Risk Assessments**

5.2.1 The Compliance Summary for PPC installations is accessed through the CDA system. The compliance summary should be completed after every inspection and as per QA079 for reports. This is required to assist in the generation of quarterly reports on compliance for management purposes so it is essential that you record the CAR number, date inspection / visit took place and reason, ie planned inspection or as the result of complaint / incident. This can be completed before you have finalized your CAR report so account can be taken of substantial non compliances.

5.2.2 The Compliance Summary and Risk Assessment for each installation needs to take into account all relevant sources of information including:

- Compliance with the permit conditions via compliance inspections and audits;
- Monitoring data from operators and check monitoring exercises;
- Complaints and incident reports, (including Schedule 1 Notifications); and
- Environmental Assessments, (e.g. Odour, Noise, etc).

5.2.3 The Compliance Summary and Risk Assessment for PPC installations is accessed through the CDA system, and the Annual Risk Assessment should be completed for each installation before the 31<sup>st</sup> May for the previous compliance period.

5.2.4 The Compliance Summary and Risk Assessment requires the following information to be inputted to the CDA system by the inspector:

- Compliance year;
- Complexity attribute details;
- Impacts attribute Part 1 details;
- Impacts attribute Part 2 details;
- Compliance attribute Part 1 details; and
- Compliance attribute Part 4 details.

(Part 2 and 3 is completed automatically from the results of the Compliance Assessment Reports / Annual report Assessment / schedule 1 assessments and complaints against the site carried out / received during the compliance period).

5.2.5 The Compliance Summary and Risk Assessment report is saved automatically on the CDA, but is not a permanent record as the weightings may be changed from year to year. A copy of the report at the time may be saved in pdf format into the EDMS container for the installation containing the year, installation and “Risk Assessment” in the title if the inspector wishes to send to the operator.

5.2.6 When the annual risk assessment is complete, in the CDA system, go to Reports, Risk Assessment Reports, choose the Risk assessment report, find the relevant site and year of report and hit “run report”. When the report appears, in the top tool bar choose PDF or XPS in the data box. A screen allowing you to save the report as a PDF to your C drive appears and name the document as Pxxxx/xxA Site Name 20xx Risk Assessment. Then save to relevant site EDMS container.

5.2.7 Once all risk assessment for the given year have been complete, a report will be extracted from the system as the “master copy” of that years RAMS outcomes. This will be saved in the IPRI Annual Business Plan and KPI statistics container in a file called PPC RAM assessments. This is a historic tracking file of annual summary statistics for all sites and

is used to put installations into their various risk categories. This is the definitive record of annual risk assessments for PPC installations.

### **5.3 Suspected Breaches of PPC Permit Conditions**

5.3.1 Where an Inspector identifies a potential substantial non-compliance of a PPC Permit Condition, through an inspection or other compliance assessment activity, this must be brought to the attention of their line manager as soon as practicable, citing the specific requirement that may have been breached. All substantial non-compliances require a case review, (Refer to QA 042 Pollution Prevention & Control – Enforcement Action).

### **5.4 Breaches of EU Directives still relevant to the UK**

5.4.1 Where an Inspector identifies or suspects that there has been a breach of an EU Directive, through an inspection or other compliance assessment activity, this must be brought to the attention of their line manager and the Chief Inspector as soon as practicable, citing the Directive and the specific requirement that may have been breached. The Chief Inspector, Inspector and line manager, (where applicable), must conduct a case review, (Refer to QA 042 Pollution Prevention & Control – Enforcement Action).

## **6.0 Documentation**

6.1 Q4/2 IPRI PPC Part A Compliance Assessment Report

6.2 Q4/4 IPRI PPC Part B Compliance Assessment Report

6.3 Q4/6 IPRI PPC Farms Compliance Assessment Report

6.4 Q4/7 Odour Assessment Reporting Form

## Appendix 1. Core Elements for Compliance Assessment Programme

Summary of Core compliance area covered at inspections:

	Part A (non Farm)	Part A Farm	Part B
Emissions to air	✓	✓	✓
Emissions to Water	✓	✓	*
Sewer emissions	✓		
Soil and Groundwater protection	✓	✓	*
Odour	✓	✓	✓
Environmental Management Systems	✓		✓
Training	✓	✓	✓
Maintenance	✓	✓	✓
Incidents and Complaints	✓	✓	✓
Waste Management	✓	✓	*
Resource efficiency	✓	✓	
Accident management plan	✓	✓	
Noise and Vibration	✓	✓	
Monitoring, Recording, Reporting and notifying	✓	✓	✓
Improvement programme	✓	✓	✓
Animal Housing		✓	
Feed delivery		✓	
Litter Storage		✓	
Litter Utilisation		✓	

\* although these elements are not core they are to be reviewed during inspections

## Appendix 2 Expansion of Part A (non Farm) Installation Elements

1. Emissions to Air.

An inspection will only cover a sample of data over the cycle therefore information received through operator returns and check monitoring will also need to be taken in to account (see QA 079). Inspections should normally focus on the operators approach to monitoring and quality assurance for emissions data along with checking a sample of the information recorded. Assessment of compliance with relevant standards such as UKAS or MCERTS requirements or BSEN14181 should also be included.

2. Emissions to water sewer and groundwater.

Inspections should include a check of results of monitoring carried out in accordance with the permit. Inspections should normally focus on the operators approach to monitoring and quality assurance for emissions data along with checking a sample of the information recorded. Assessment of compliance with relevant standards such as UKAS or MCERTS requirements should also be included. Information received through operator returns and check monitoring will also need to be taken into account. (see QA079)

3. Environmental Management System

- Training arrangements should be checked to ensure that they match permit requirements. This should normally entail some documented system for assessing training requirements and for retaining training records.
- Work instructions should be available for key activities which can affect the environmental impact of the installation.
- A system for planning maintenance, including preventative maintenance should be available.
- Systems for investigation of complaints and incidents should be checked.

4. Implementation of Site Protection and Monitoring Programme.

The requirements of the site protection and monitoring programme will vary from installation to installation. However every installation should have an infrastructure monitoring programme. As a minimum inspections should assess whether the infrastructure monitoring programme is fit for purpose against the risks posed by the site and also whether there are records to demonstrate whether it has been implemented.

5. Waste Management

Inspectors should assess records held on the quantities of all wastes disposed and check that the waste contractors have the appropriate licenses or exemptions in place. Copies of same

should be held be the installation. Details of the final destination of the waste should also available. (ie Landfill site, or recycling company etc.)

6. Resource efficiency should include
  - Waste storage and disposal. Inspections should include checking that arrangements for storage of waste materials matches the locations and conditions set out in the relevant section of the permit. Records (including consignment notes) should also be checked to ensure that waste is being disposed of (or recovered) at the facilities described.
  - Raw materials. Inspections should include a check on conditions of the permit covering raw materials selection (and periodic review), the presence and review of a waste minimisation audit and the water audit requirements.
  - Energy Efficiency: Inspections should check the maintenance of an energy management system, that energy consumption is reported annually and that an energy efficiency plan is maintained in accordance with the permit.
7. The presence of an up to date accident management programme will be checked during the inspection cycle. Key requirements are that the programme should set out responses to the main accident scenarios identified including loss of containment and that the programme should be reviewed after any relevant environmental accident.
8. The operator's performance against reporting requirements can be checked as part of the annual compliance assessment/risk assessment and at inspections. This should entail a check against all the requirements in the reporting section of the permit and that the monitoring data listed in the appropriate schedule has been submitted. Operator records will be checked as part of the compliance assessment of other aspects of the permit at inspections.
9. Operator progress against implementing the improvement programme should also be checked during the inspection cycle.

### Appendix 3 IPRI - Guidance for Rating Non Compliance at Part A installations

Level of non compliance	Category of non compliance	Examples	Response in report	Comments
<b>Substantial : S-NC</b>	Emissions	<ul style="list-style-type: none"> <li>significant exceedence of limit value (&gt;3 times) or prolonged exceedence with no corrective action.</li> </ul>	Ranges from action required, 'considering appropriate enforcement action box' or to Enforcement action. Where corrective action is needed urgently, an enforcement notice should normally be issued, unless it is already in progress by the operator or about to be put in place. <b>NOTE. All Substantial non-compliances require a case review with line manager to agree enforcement action, (Refer to QA004).</b>	May lead to further enforcement action and completion of case review template.
	Soil and groundwater protection	<ul style="list-style-type: none"> <li>No system for checking integrity of containment infrastructure.</li> <li>No checks being carried out.</li> </ul>		
	Environmental Management	<ul style="list-style-type: none"> <li>No environmental management system to deliver permit requirements</li> <li>No system for keeping necessary records for a key aspect and no records available – eg no complaints procedure and no records of complaints where these are known to have occurred.</li> <li>Absence of training systems and evidence of staff not meeting required competence</li> <li>Failure to address I-NC raised previously.</li> </ul>		
	Monitoring, reporting and notification	<ul style="list-style-type: none"> <li>No monitoring in place for releases with pollution potential.</li> </ul>		
	Improvement programme (including CAR actions)	<ul style="list-style-type: none"> <li>Failure to address Improvement Item or CAR Action previously raised as I-NC</li> </ul>		
	Incident or event with medium impact or potential impact of greater than medium (CICS 2 or higher)	<ul style="list-style-type: none"> <li>Significant off site odour causing loss of amenity.</li> <li>Significant damage to primary or secondary containment structures.</li> <li>Note that any water pollution incident, even those meeting the low category will normally be classed as a substantial non compliance. Medium and high water pollution incidents will trigger completion of a case review template.</li> </ul>		
	Directive Breach	<ul style="list-style-type: none"> <li>Any non compliance which is a Directive breach</li> </ul>		

Level of non compliance	Category of non compliance	Examples	Response in report	Comments
<b>Intermediate: I-NC</b>	Emissions	Moderate exceedence of limit (1.5 – 3 times elv)	Ranges from 'addressed by actions in report' box to warning box. Unlikely to lead to enforcement notice unless fails to resolve in an appropriate timeframe.	
	Soil and groundwater protection	<ul style="list-style-type: none"> <li>• Soil / groundwater protection systems in place with significant gaps,</li> <li>• Checks not carried out on several occasions</li> </ul>		
	Environmental Management	<ul style="list-style-type: none"> <li>• Several gaps in procedures or records for a key aspect (eg records not available if key personnel are absent) and no measures being taken to address this.</li> <li>• Evidence of failures in procedures eg complaints procedures in place, but not consistently followed.</li> <li>• Failure to address M-NC raised previously</li> </ul>		
	Monitoring, reporting and notification	<ul style="list-style-type: none"> <li>• Several gaps in monitoring records. Intermittent monitoring providing some useful compliance information, but failing to meet all permit requirements.</li> </ul>		
	Improvement programme (including CAR actions)	<ul style="list-style-type: none"> <li>• Failure to address Improvement Item or CAR Action previously raised as M-NC</li> </ul>		
	Incident or event with low impact or potential impact of greater than low (CICS 3)	<ul style="list-style-type: none"> <li>• Moderate off site odour, perhaps not affecting sensitive receptors.</li> <li>• Several examples of material storage in inappropriate areas, but no evidence of damage / leakage.</li> <li>• See notes against S-NC for water pollution incidents.</li> </ul>		

Level of non compliance	Description of NC	Examples	Response in report	Comments
<b>Minor: NC-M</b>	Emissions	Slight exceedence of limit value (<1.5 times limit) Do not raise NC at all if within confidence levels.	‘Addressed by actions in report’ box	
	Soil and groundwater protection	Occasional missing integrity checks – eg drains etc being checked, but not to required frequency.		
	Environmental management.	Procedures in place, but records missing for a small number of parameters or a small number of occasions, but otherwise good.		
	Monitoring, reporting and notification	<ul style="list-style-type: none"> <li>• Minor gaps in monitoring records which are being addressed.</li> <li>• Subjective noise monitoring carried out in work areas but not suitable for environmental monitoring</li> </ul>		
	Improvement Programme	Date for compliance exceeded and no extension agreed		
	Incident or event demonstrating some loss of control but with negligible or no environmental impact and low potential impact	<ul style="list-style-type: none"> <li>• Isolated shortcomings in storage eg one or two drums outside contained area.</li> </ul>		