

CHIEF INSPECTORATE FOR ENVIRONMENTAL PROTECTION

Inspection for Environmental Protection Supervision System

DOCUMENT NAME

Document reference: 3.2.2.2.

Horizontal line for air protection

Version (0.01), (Date: 17-11-2008)

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- 3.2. Tools for supervision programming
- 3.2.2. Horizontal lists
- 3.2.2.2. Horizontal list for air protection**

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SUPERVISION

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Support from Norway by co-financing from Norwegian Financing Mechanism

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Introduction

Horizontal checklist is used for the purpose of providing array and system to issues which should be checked during inspection, and for the purpose of working out effective methods of efficiency improvement and quality of plant inspection conducted by inspectors for environmental protection. Horizontal checklist, differently to sector checklists, features reference to issues characteristic for a given domain, regardless of the type of plant. Air protection is one of such domains.

Regulations concerning issued of air protection were the main basis for working out the project of checklist questions:

- statute of 27 April 2001 Environmental Protection Act (Journal of Laws of 2008 No. 25, pos. 150, with amendments),
- ordinance of the Minister of Environment dated 20 December 2005 concerning emission standards from plants (Journal of Laws No. 260, pos. 2181),
- ordinance of the Minister of Environment dated 22 December 2004 concerning cases, where release of gases or dusts from plant into air does not require permit (Journal of Laws No. 283, pos. 2840),
- ordinance of the Minister of Environment dated 22 December 2004 concerning types of plants the operation of which requires application (Journal of Laws No. 283, pos. 2839),
- ordinance of the Minister of Environment dated 23 December 2004 r. concerning requirements on the conducted measurements of emission volume (Journal of Laws No. 283, pos. 2842),
- ordinance of the Minister of Environment dated 27 February 2003 concerning types of results of measurements conducted in connection with plant or equipment operation,

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transferred to suitable environmental protection institutions and the date and way of presentation (Journal of Laws No. 59, pos. 529),

The sample list of inspection questions is not in any way a closed list. It should assist the inspector in preparing inspection questions dependent on the aim of inspection, and on the planned duration of the inspection.

The basic issue, which should be decided in the first stage of inspection, is proper identification of plant or technological process or technical operations conducted on the plant. The manner of further proceedings will be a consequence of correct identification of plant type.

The conducted inspection can aim at e.g. checking observance of the terms of permit for introducing gases or dusts into air, execution of self-monitoring in the scope of gases and dusts release to air, and the inspection can be planned as a problem inspection.

It is understandable that the main concern here is the emission of dusts and gases into air, while other issues, i.e. waste management (storage of waste may be the source of gases or dusts emission into air) and the possibility of a breakdown in connection with release of dangerous substances, used in the above plants, into air have been treated marginally.

Basing on the set of questions contained in the said horizontal checklist, the inspector can mainly check and assess:

- volume of the emission of gases and dusts into air,
- sufficiency of environment protecting devices applied in the plants,
- risk for environment, which may arise from improper operation of the plant or technological process or technical operations executed in the plant,

and risk, which may cause breakdown due to release of dangerous substances used in the above plants, into air.

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Horizontal list for air protection

Pos.	Question	Enter YES /NO/ or DESCRIPTION	Comments
AIR – GENERAL ISSUES			
1	Are there sources of organized emission of gases or dusts to air in the plant? a/ fuel burning plants? b/ waste incineration or co-incineration plants? c/ asbestos producing or processing plants? d/ titanium dioxide production plants? e/ plant which use organic solvents? g/ other (list type)?		
2	Are there sources of unorganized emission of gases or dusts to air in the plant??		
3	Does the release of gases or dusts from the plant into air requires: a/ integrated permit? b/ permit for release of gases or dusts into air? c/ application?		
4	Is the formal and legal status in the scope of release of gasses and dusts into air is regulated?		
5	Are there sources of emission which do not require permit or application?		
6	Are there emission standards established for the plant or technological process or technical operation executed in the plant?		
7	Does the permit or application for the plant define quantities of fuel, raw materials and service media and their properties, features or parameters?		
8	Does the processing plant document the quantity and quality of used fuel, raw materials and service media?		
9	Are there any preventive or corrective actions undertaken if the types and quantities of fuel, raw materials and service media are exceeded?		
10	Is the operating time of sources of generation and places of release of gases or dusts into air, registered?		

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11	Does the above operating time meet the values defined in the permit or presented in the application?		
AIR – EMISSION VOLUME OF GASES OR DUSTS RELEASED INTO AIR			
12	Have there been any changes to the plant or technological process or technical operation led in the plant, in the last time which have not been included in the permit or application?		
13	Have there been any changes of types or quantities of gases or dusts released into air which have not been included in the permit or application?		
14	Is it possible to establish by measuring, the emission volume of gases or dusts released into air (equipped with emission volume measuring stations)?		
15	Is the volume of emission of gases and dusts measured from all sources of emission?		
16	In case of lack of technical capabilities for emission measurement, a procedure of establishing the emission volume by calculation has been implemented?		
17	Does the plant operator document the volume of emission into air?		
18	Is the plant equipped with devices to protect the air from pollution?		
19	Do the applied technical solutions provide sufficient limiting of emission and guarantee observance of terms defined by the permit or terms presented in the application?		
20	Is the working order of devices protecting air from pollution assessed?		
21	Are the results of the plant working condition assessment recorded?		
22	Is it possible for the gases and dusts to be released into air bypassing the devices protecting air from pollution?		
23	Were there any interruptions in operation of the protective devices?		
24	Is the time of protective devices operation interruption recorded?		
25	Is there a protective measure from uncontrolled, release of untreated gases or dusts into air?		
26	Are there preventive or corrective actions undertaken in cases of interruptions, drop of efficiency or availability of devices protecting air from pollution?		



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27	Are the plants operated by personnel with suitable qualifications?		
AIR – ISSUES CONCERNING MONITORING			
28	Does the obligation of measuring the emission volume of gases or dusts released into air result from: a/ legal enforcement? b/ administrative decisions?		
29	Does the plant conduct the emission measurements: a/ constantly? b/ periodically?		
30	Is self-monitoring of emission into air conducted: a/ in required scope? b/ with defined frequency? c/ with the use of reference method (for cases where such are determined)?		
31	Does the plant operator provide execution of emission to air volume measurements by an accredited laboratory?		
32	Are the self-monitoring results transferred to suitable institutions a/ in a timely manner? b/ in a required way?		
33	Are preventive or corrective actions undertaken in cases the permitted volumes or standards are exceeded?		
34	What documents confirm, that the plant does not release into air gases or dusts other than the ones defined in the permit or application?		
35	Does the permit determine the scope and manner for monitoring of technological processes?		
36	Is documentation confirming supervision over correct technological process kept?		
37	Are there records of interruptions of technological process?		
38	What actions are undertaken to prevent interruptions of the technological process?		
WASTE GENERATED IN THE PLANT			



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39	Has the generation of waste connected with release of gases or dusts into air been regulated by: a/ information? b/ decision confirming a programme? c/ permit for waste generation? d/ integrated permit?		
40	Has all the waste been covered by legal regulations?		
41	Is the waste stored in indicated, marked places, in a selective manner?		
42	Can emission of gasses or dusts into air occur in result of waste storage?		
43	Have the waste storage places been protected from uncontrolled emission into air?		
44	Have procedures been worked out to minimize the volume of generated waste?		
45	Were the above procedures implemented?		
46	Are the records kept in line with valid specimens of documents?		
47	Are preventive and corrective actions undertaken in case of handling waste in a manner noncompliant with the waste act?		
RISKS FOR THE QUALITY OF AIR CONNECTED WITH TRANSPORT OR STORAGE OF CHEMICAL SUBSTANCES OR PREPARATIONS			
48	Does the plant transport/store/ use in technological processes chemical substances and preparations, the release of which may cause risk to the quality of air?		
49	Are the storage tanks of chemical substances and preparations maintained in proper technical condition?		
50	Do all the chemical substances and preparations used in the plant, possess product characteristics sheets?		
51	Is the operator personnel of plants, where chemical substances are used, trained on risks connected with conducted technological processes and proceedings in case of plant breakdown?		
52	Were there breakdown situations connected with release of chemical substances and preparations into air at the terrain of the plant?		
53	Were there preventive and corrective actions undertaken in connection with breakdown?		

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