

PERMIT CONDITIONS COMPLIANCE CHECK REPORT

Installation Address:	WTG Treatment Ltd Shed 6, Immingham Dock Immingham North East Lincolnshire DN40 2LZ
Contact:	Mr Scott Anderson
Permit Ref:	EP/201500001
Date of Varied Permit:	New Permit issued 2016
Permitted activity:	Wood Preservation Process A2
Guidance Note:	
Date of Visit:	08/02/17. check visit and re-visit of requested documents.
Report Reference:	
Condition number:	
Records Required records kept and available? Written procedures and training issued to staff? Maintenance programme?	Yes. written procedures in place. — Yes.
Reporting Emissions monitoring	
Incident procedure	
Written Management systems	Yes internal + external. maintenance in place and recorded.
29 Odour	_____
30 Particulate Matter	_____
31 Resource utilisation	_____
32 waste recovery/ avoidance	_____
33 – 41 Protection of atmosphere	_____

POLLUTION PREVENTION & CONTROL

	Training records in place.
42 - 43 Atmospheric Monitoring Solvent Management Plan	Solvent management plan submitted and compliant. Records of solvent retention and timber volume recorded on worknet database.
Protection of soil and ground water	Compliant.
Soil and groundwater monitoring	
Additional	

Risk Assessment Score Sheet

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	
(C) Category 3	30	30

Component 2 - Progress with Upgrading		
Status of Upgrading	Possible Scores	Score Awarded
(A) Upgrading not complete but SG Note deadline has yet to be reached	5	
(B) Upgrading not yet complete and SG 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)			
Proximity to Emission Source	Sensitivity of Receptors		
	(x) High	(y) Medium	(z) Low
(A) < 100m* Reason Humber Estuary designated a SSSI	20	12	5
(B) 100 - 250m*	12	10	3
(C) 250 - 500m*	5	3	1
(D) > 500m*	0	0	0

POLLUTION PREVENTION & CONTROL

* 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	
(B) No such air pollution problems	0	

Total Score for Environmental Impact Appraisal	Range 0 to 70	35
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Operator Performance Appraisal

Component 5 - Compliance Assessment

Scale of Non-Compliance (Within 12 month period prior to review)	Possible Scores	Score Awarded
(A) Incident leading to justified complaint but no breach of specific authorisation condition or of general/residual BATNEEC condition	0 points	0
(B) Incident leading to a justified complaint*	5 per incident	0
(C) Breach of authorisation not leading to formal action (Updated by AQ 18)	10 per breach	0
(D) Incident leading to formal caution, Enforcement Notice or prosecution	15 per incident	0
(E) Incident leading to a Prohibition 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	Y 0
(B) Monitoring requirements reduced because results over time show consistent compliance?	-5	0	0	N/A 0
(C) Process operation modified where any	0	5	0	N/A 0

POLLUTION PREVENTION & CONTROL

problems indicated by monitoring?				
(D) Fully documented and adhered to maintenance programme, in line with authorisation?	0	5	0	Y O
(E) Full documented records as required in authorisation available on-site?	0	5	0	Y O
(F) All relevant documents forwarded to the authority by date required?	0	5	0	Y O
Total score	(-5 to 30)			O

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

Total Score for Operator Performance Appraisal	Range -10 to 105	O
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OVERALL SCORE FOR THE PROCESS	Range -10 to 175	35
REGULATORY EFFORT CATEGORY * high=score of >80, medium 40-80 and low <40	LOW, MED, HIGH	LOW

Officer Signature: *VICKY THOMPSON V-Thompson*

Operator Signature *SCOTT ANDERSON Scott Anderson*

Date: *08/02/17*

checked on 08/02/17
during visit.

Vicky Thompson (NELC)

From: Thompson, Vicky
Sent: 06 September 2016 17:24
To: Scott Anderson (scott@woodbridge.co.uk)
Subject: Compliance visit
Attachments: Compliance Report 06.09.16.pdf

Good Afternoon Scott,

Re: WTG Treatments Ltd, Shed 6 Immingham Dock, A2 Wood preservation process. Environmental Permitting (England and Wales) Regulations 2010 (as amended) Permit Ref No: EP 201500001

As part of our inspection programme I wish to confirm my visit on the 6th September 2016, to the above premise. The process was inspected and I am pleased to note that everything was found to be of a satisfactory standard.

However, as discussed there are a few areas in relation to written procedures and record keeping (refer to Conditions 4 and 22) that require improvement. These areas are as follows:

- A fully documented maintenance programme to include full external service required on plant and what daily/weekly and monthly checks required.
- Records of these checks and service certificates to be available for inspection (I did get to see some of the in house checks completed).
- Written procedures to be in place (signage can be used for drivers arriving to site to report to office) for staff to be informed on what measures to undertake in event of incident / spillage and when to report to Regulator (refer to Condition 22). The clean-up of spillage procedure (if minor) – will you have an absorbent material available on site and how staff should store and dispose of this contaminated material after used.
- Monitoring (refer to condition 43) – you have a system to record levels of solvent before and after treatment and volume of input of wood treated. As discussed a connection to the database and a reporting method to be implemented to demonstrate compliance with the emission limit values (in **kg / m3!**)

Please ensure the above areas are implemented within 3 months of the date of this email.

All permitted processes/installations are risk rated in line with criteria determined by Defra. This rating is subject to review following every inspection, to ensure that the rating remains an accurate reflection of the level of risk posed by the installation, in terms type of process, proximity to sensitive receptors, compliance with permit conditions, management, training and number of complaints received. Having performed an assessment of the risk, I would like to inform you that the installation is currently rated as **MEDIUM** risk.

A copy of the compliance report has been attached for your records.

As discussed – a solvent management plan needs to be submitted on an annual bases (31st Jan each year). I have provided a link below to the guidance document that will hopefully assist. You will need to provide a summary of the annual solvent inputs and outputs, calculation of the annual solvent emission and calculation method used.

<http://webarchive.nationalarchives.gov.uk/20130123162800/http://archive.defra.gov.uk/environment/quality/pollution/ppc/localauth/pubs/guidance/notes/pgnotes/documents/pg6-03-11.pdf>

Thank you for your assistance Today during my visit.

Regards

Vicky Thompson, Technical Officer, Pollution Control, North East Lincolnshire Council

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ACHIEVEMENT
AWARDS 2016
HIGHLY
COMMENDED **MJ**