

PERMIT CONDITIONS COMPLIANCE CHECK REPORT

Installation Address:	Dunlop Oil and Marine Ltd Moody Lane Pyewipe Grimsby DN31 2SP
Contact:	Chris Allen
Permit Ref:	EP/20020004
Date of Varied Permit:	
Permitted activity:	Rubber process
Guidance Note:	6/28(04)
Date of Visit:	15/10/15
Report Reference:	DOM1
Condition number:	
5.1 Table 4. PM annual extractive 10mg/m ³ for bag filtration unit. 50 mg/m ³ for Banbury Mixer. Isocyanate 0.1mg/m ³	Particulate criteria BS 150 9066 met for Point 1 + 2 (Bag filtration unit + Banbury mixer) Test conducted 12th November 2014 Filtration unit PM = 0.2 mg/m ³ compliant Banbury mixer PM = 2.1 mg/m ³ compliant Isocyanate = < 0.0004 mg/m ³ compliant.
3 VOC Fugitive releases should be reduced by 50% for period of 12 months from 1 April 1992. Determined using solvent management plan.	Solvent Management Plan available? Yes. Licensed hazardous waste disposal agents used? Yes - Greenway Solvent used vs rubber processed? recorded on solvent usage overview. Target Value = Solvent consumption in 1992/Tonnes of rubber used x 0.57 (Target value 0.68) 2013 = 0.61 P2 = 0.57 (includes rubber purchased)
Reference Conditions 273.15K, 101.3kPa used?	Yes correct reference conditions used for extractive test
Reduction Scheme	Reduction Scheme
Solvent Management Plan adhered	Yes
Low or organic solvent coating system used?	Performed review 2013/14 Bonding agent to remain same.

POLLUTION PREVENTION & CONTROL

SED Box 7	Designated materials used: No changes. COSH assessment review hazard rating of materials.
14 Monitoring records available?	Yes
15 Regulator informed in advance of annual test?	Yes
16 Visible emission during visit or odour beyond site boundary?	No visible emission and odour beyond site boundary.
17 Silo	Informative
18 Inspection of filtration plant? Carbon black storage and empty bags	Is bag filter or cartridge used? Yes and inspected. Are pressure drop sensors used to monitor arrestment plant? Yes Empty bags that have contained carbon black placed in stored containers?
20 Abnormal event procedure and records	Yes - Release of carbon Black procedure.
21 Non-compliance causing immediate danger to human health – procedure in place?	Yes - Ref SP 0216 procedure.
LEV Maintenance certificate?	Internal 6 monthly external annual. — certificate available
Sampling provisions for extractive testing and compliance Test methods Nitrogen Dioxide ISO 10849? PM ISO 12039?	Yes.
32 VOC and Odour control storage	Suitable storage and odour control. VT to contact LAU to discuss fresh dry time outside for recycling.
33 Bulk Storage tanks	MEK tank - update VT on whether to replace or paint white.
34 Spillage procedure	Yes
35 VOC Control Handling	Suitable controls.
36 Cleaning operations	Good.
38 VOC Control Waste	Good.
Training	Systems at work. Yes.
Maintenance Programme	Yes.

POLLUTION PREVENTION & CONTROL

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 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	

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

* 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	0

Total Score for Environmental Impact Appraisal	Range 0 to 70	33
---	----------------------	-----------

POLLUTION PREVENTION & CONTROL

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

POLLUTION PREVENTION & CONTROL

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 0
(B) Specific responsibilities assigned to individual staff for these procedures?	0	5	0	Y 0
(C) Completion of individual responsibilities checked and recorded by the company?	0	5	0	Y 0
(D) Documented training records for all staff with air pollution control responsibilities?	0	5	0	Y 0
(E) Trained staff on site throughout periods where potentially air-polluting activities take place?	0	5	0	Y 0
(F) Is an 'appropriate' environmental management system in place?	-5	0	0	N/A 0
Total	(-5 to 25)			0

Total Score for Operator Performance Appraisal	Range -10 to 105	0
---	-------------------------	---

OVERALL SCORE FOR THE PROCESS	Range -10 to 175	33
REGULATORY EFFORT CATEGORY * high=score of >80, medium 40-80 and low <40	LOW, MED, HIGH	LOW

Officer: Vicky Thompson

Officer Signature: 

Operator Signature



Date: 15/01/15

