

PERMIT CONDITIONS COMPLIANCE CHECK REPORT

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|---|---|
| Installation Address: | Energy Pyrolysis West Factory Bale Store Moody Lane Grimsby North East Lincolnshire DN31 2TT |
| Contact: | Mr Saunders |
| Permit Ref: | EP/20140001 |
| Date of Varied Permit: | New Permit issued 2015 |
| Permitted activity: | Small Waste Incineration Process |
| Guidance Note: | |
| Date of Visit: | 03/06/15 |
| Report Reference: | |
| Condition number: | - Site not currently operational. |
| Management 1.1 – 1.4 Management systems and competence scheme in place? Written procedures and training issued to staff? Maintenance programme? | Staff trained and have access to operation training manual. Operation procedure - shut down (SOP005). Site not currently in operation working towards full maintenance programme. |
| Delivery and reception of waste 2.1 -2.4 Operator prevents noise and odour from site? Operator complies with maximum tyres throughput 7500 tonnes per annum, Measures in place to demonstrate compliance with this criteria. | Have weekly checks in place. waste transfer notes kept and Drivers report to gate house to ensure member of staff available to receive waste tyres. |
| Heat recovery 3.1 | |
| Avoidance, recovery and disposal of residues produced by activity. 4.1 application of Article 4 of the Waste Framework Directive? Scrap metal? | Steel sold on to EMR. Fuel Oil and Char looking out for buyers at present. TFS. Quantities of by products recorded - no product sold on as yet. |
| 5.1 - 5.3 Authorised waste clearly distinguished? Max of 7500 tonnes per annum of tyres incinerated in the SWIP? Max storage of tyres stored on site at any one time not exceed 250 tonnes? | Compliant. |
| 6 Installation boundary | O.k. |
| Operating techniques 7.1 – 7.9 Waste not to be excepted procedure? When waste not to be charged procedure | * Add cleaning procedure build-up of / accumulation of dust and prevent vehicles tracking dust off site. ↳ emergency shut down procedure. |

POLLUTION PREVENTION & CONTROL

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| in place? Collection area of contaminated water due to spillage or run – off water due to fire fighting.? | Site bunding o.k. |
| 8 Emissions monitoring Compliance with Schedule 3? | Continuous Monitoring PM - Not currently operating - working towards finding TOC - CEM system to install. CO - NO2 - Temp (combustion chamber inner wall) o.k. |
| 8 Emissions Monitoring | Extractive Latest emission report submitted March 2015. All parameters completed and achieved compliance with emission limits. |
| 8 Residue handling and testing (8.3 – 8.7) | Vac / dust cleaner used for char fuel oil stored in IBC and fully banded. |
| 9 Records available on site? | Yes - * Some procedures and maintenance to update. |
| 10 Notifications | |
| Additional Base line report | * GK to organise |

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 | |

Report Reference: -

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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 (0.119km) | 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 | |

| | | |
|---|----------------------|----|
| Total Score for Environmental Impact Appraisal | Range 0 to 70 | 50 |
|---|----------------------|----|

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 | |
| (B) Incident leading to a justified complaint* | 5 per incident | |
| (C) Breach of authorisation not leading to formal action (Updated by AQ 18) | 10 per breach | |
| (D) Incident leading to formal caution, Enforcement Notice or prosecution | 15 per incident | |
| (E) Incident leading to a Prohibition Notice | 20 per incident | |
| 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.

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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 |

not operating fully.

Some additional programmes to implement once fully operational. + check list.

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 0 |
| Total | (-5 to 25) | | | 0 |

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

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|---|------------------|-----|
| OVERALL SCORE FOR THE PROCESS | Range -10 to 175 | 50 |
| REGULATORY EFFORT CATEGORY * high=score of >80, medium 40-80 and low <40 | LOW, MED, HIGH | MED |

Officer Signature: VICKY THOMPSON *V. Thompson*

Operator Signature *W. Tisk* JOHN SAUNDERS

Date: 03/06/15

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