

POLLUTION PREVENTION & CONTROL

PERMIT CONDITIONS COMPLIANCE CHECK REPORT

<b>Installation Address:</b>	WTG Treatment Ltd Shed 6, Immingham Dock Immingham North East Lincolnshire DN40 2LZ
<b>Contact:</b>	Mr Scott Anderson
<b>Permit Ref:</b>	EP/201500001
<b>Date of Varied Permit:</b>	New Permit issued 2016
<b>Permitted activity:</b>	Wood Preservation Process A2
<b>Guidance Note:</b>	
<b>Date of Visit:</b>	06/09/16.
<b>Report Reference:</b>	
<b>Condition number:</b>	
<b>Records</b> Required records kept and available? Written procedures and training issued to staff? Maintenance programme?	
<b>Reporting</b> Emissions monitoring	Records in place. Need to connect to database - add factor to demonstrate Total Emission Limit.
<b>Incident procedure</b>	* Written procedure.
<b>Written Management systems</b>	Compliant. * 3 months.
<b>29 Odour</b>	No odour beyond site boundary.
<b>30 Particulate Matter</b>	No PM beyond site boundary.
<b>31 Resource utilisation</b>	O.k.
<b>32 waste recovery/ avoidance</b>	O.k.
<b>33 – 41 Protection of atmosphere</b>	Compliant.

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<b>42 - 43 Atmospheric Monitoring</b>  Solvent Management Plan	database store data of start levels in vessel and after. Data can be used to calculate compliance with Total Emission limit.
<b>Protection of soil and ground water</b>	* connection needed to database + add formula. Weekly result.  <div style="text-align: center; border: 1px solid black; border-radius: 50%; width: 40px; margin: 0 auto; padding: 2px;">D</div> Compliant.
<b>Soil and groundwater monitoring</b>	5yrs borehole sampling. 10yrs soil.
<b>Additional</b>	

### 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

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\* 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	

<b>Total Score for Environmental Impact Appraisal</b>	<b>Range 0 to 70</b>	<b>35</b>
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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
<b>Total</b>	<b>(Max. 50)</b>	<b>0</b>

\* 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

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problems indicated by monitoring?				
(D) Fully documented and adhered to maintenance programme, in line with authorisation?	0	5	0	* 5
(E) Full documented records as required in authorisation available on-site?	0	5	0	* 5
(F) All relevant documents forwarded to the authority by date required?	0	5	0	N/A 0
<b>Total score</b>	<b>(-5 to 30)</b>			<b>10</b>

Service in place daily + weekly checks needed.  
 - new site but no record on start up test.

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	* N 5
(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
<b>Total</b>	<b>(-5 to 25)</b>			<b>5</b>

New site some further procedure needed + held on site.

<b>Total Score for Operator Performance Appraisal</b>	<b>Range -10 to 105</b>	<b>15</b>
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<b>OVERALL SCORE FOR THE PROCESS</b>	<b>Range -10 to 175</b>	<b>50</b>
<b>REGULATORY EFFORT CATEGORY</b> * high=score of >80, medium 40-80 and low <40	<b>LOW, MED, HIGH</b>	<b>MED.</b>

Officer Signature: V. Thompson - VICKY THOMPSON

Operator Signature: *Sune Anne SWAN ANDERSON*

Date: 06/09/16.

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POLLUTION PREVENTION & CONTROL INSPECTION REPORT

Report Reference: -

Coppers. deliver:

\* Spill. procedure.