

POLLUTION PREVENTION & CONTROL




PERMIT CONDITIONS COMPLIANCE CHECK REPORT

<b>Installation Address:</b>	Dunlop Oil and Marine Ltd Moody Lane Pyewipe Grimsby DN31 2SP
<b>Contact:</b>	Chris Allen
<b>Permit Ref:</b>	EP/20020004
<b>Date of Varied Permit:</b>	
<b>Permitted activity:</b>	Rubber process
<b>Guidance Note:</b>	6/28(04)
<b>Date of Visit:</b>	17/02/16
<b>Report Reference:</b>	DOM1
<b>Condition number:</b>	
<b>5.1 Table 4.</b> PM annual extractive 10mg/m <sup>3</sup> for bag filtration unit. 50 mg/m <sup>3</sup> for Banbury Mixer. Isocyanate 0.1mg/m <sup>3</sup>	extraction test completed 15/01/16 2.5mg/m <sup>3</sup> at rubber mix. TPM TPM at extraction 0.095 mg/m <sup>3</sup> . Isocyanate 0.004 mg/m <sup>3</sup> . LEV VT to check new method.
<b>3</b> 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. Solvents MEK & SBP.2. Solvent used vs rubber processed? recorded. Target Value = Solvent consumption in 1992/Tonnes of rubber used x 0.5? (Target value 0.68) achieved 0.6. compliant
<b>Reference Conditions</b> 273.15K, 101.3kPa used?	Yes.
<b>Reduction Scheme</b>	Reduction Scheme
<b>Solvent Management Plan adhered</b>	
<b>Low or organic solvent coating system used?</b>	Yes

BS EN 13284-1 2002. PU.  
Bonding agents recorded.

## POLLUTION PREVENTION & CONTROL

<b>SED Box 7</b>	Designated materials used:  All solvents / bonding agents recorded
<b>14</b> Monitoring records available?	Yes
<b>15</b> Regulator informed in advance of annual test?	Yes.
<b>16</b> Visible emission during visit or odour beyond site boundary?	No visible emissions or odours during visit.
<b>17 Silo</b>	Informative
<b>18</b> Inspection of filtration plant?  Carbon black storage and empty bags	Is bag filter or cartridge used? Cartridge 6 monthly.  Are pressure drop sensors used to monitor arrestment plant?  Empty bags that have contained carbon black placed in stored containers?
<b>20</b> Abnormal event procedure and records	Compliant.
<b>21</b> Non-compliance causing immediate danger to human health – procedure in place?	
<b>LEV</b> Maintenance certificate?	Compliant. <del>2015</del>
Sampling provisions for extractive testing and compliance Test methods Nitrogen Dioxide ISO 10849? PM ISO 12039?	
<b>32</b> VOC and Odour control storage	
<b>33</b> Bulk Storage tanks	Compliant
<b>34</b> Spillage procedure	Compliant.
<b>35</b> VOC Control Handling	
<b>36</b> Cleaning operations	
<b>38</b> VOC Control Waste	
<b>Training</b>	Staff trained to notify team leader if breakdown with extraction system. Place on SAP system
<b>Maintenance Programme</b>	Allianz Complete annual inspection for the LEV 13th Feb 2015. inspection for 2016 completed but not received paperwork.

Report Reference: -

Duct clean completed 31/July 2015  
Internal 6 monthly checks



# POLLUTION PREVENTION & CONTROL

## Risk Assessment Score Sheet

### Environmental Impact Appraisal

<b>Component 1 - Inherent Environmental Impact Potential</b>		
<b>APRR Risk Rating Category</b>	<b>Possible Scores</b>	<b>Score Awarded</b>
(A) Category 1	10	
(B) Category 2	20	
(C) Category 3	30	30

<b>Component 2 - Progress with Upgrading</b>		
<b>Status of Upgrading</b>	<b>Possible Scores</b>	<b>Score Awarded</b>
(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	

<b>Component 3 - Sensitivity and Proximity of Receptors (circle appropriate score)</b>			
<b>Proximity to Emission Source</b>	<b>Sensitivity of Receptors</b>		
	<b>(x) High</b>	<b>(y) Medium</b>	<b>(z) Low</b>
(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.

<b>Component 4 - Other Targets</b>		
	<b>Possible Scores</b>	<b>Score Awarded</b>
(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

<b>Total Score for Environmental Impact Appraisal</b>	<b>Range 0 to 70</b>	<b>33</b>
---	----------------------	-----------

## 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
<b>Total</b>	<b>(Max. 50)</b>	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
<b>Total score</b>	<b>(-5 to 30)</b>			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	Y -5
<b>Total</b>	<b>(-5 to 25)</b>			

15014001

<b>Total Score for Operator Performance Appraisal</b>	<b>Range -10 to 105</b>	<b>-5</b>
---	-------------------------	-----------

<b>OVERALL SCORE FOR THE PROCESS</b>	<b>Range -10 to 175</b>	<b>28</b>
<b>REGULATORY EFFORT CATEGORY</b> * high=score of >80, medium 40-80 and low <40	<b>LOW, MED, HIGH</b>	<b>LOW</b>

Officer: **VICKY THOMPSON**

Officer Signature: *V. Thompson*

Operator Signature

*EA*

Date: **17/02/16**

