

POLLUTION PREVENTION & CONTROL



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:	17.10.17
Report Reference:	
Condition number:	
Records Required records kept and available?	Yes
Written procedures and training issued to staff?	Yes
Maintenance programme?	Yes
Reporting Emissions monitoring	Yes.
Incident procedure	Yes.
Written Management systems	Koppers complete annual external service on plant. Last serviced 23.03.17 In house daily, weekly and monthly checks in place and record by staff.
29 Odour	No odour beyond site boundary.
30 Particulate Matter	—
31 Resource utilisation	Yes.
32 waste recovery/ avoidance	Yes.
33 – 41 Protection of atmosphere	Compliant.

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	Training records available electronically
42 - 43 Atmospheric Monitoring Solvent Management Plan	Solvent management plan and VOC/emission monitoring report due 31 st Jan 2018.
Protection of soil and ground water	Yes.
Soil and groundwater monitoring	
Additional	Spillage procedure in place checked primary and secondary bund all o.k. absorbent granules available.

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	

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	
(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.

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	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)			Y 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	0
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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: 17/10/17

For and on behalf of
WTG Treatment Ltd

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