

PERMIT CONDITIONS COMPLIANCE CHECK REPORT

Installation Address:	Simon Storage Ltd Immingham Storage Company Ltd Immingham East Terminal Immingham Dock North East Lincolnshire DN40 2QW
Contact:	Phil Dyson
Permit Ref:	EP/200200044
Date of Varied Permit:	
Permitted activity:	Bulk storage of chemicals
Guidance Note:	
Date of Visit:	8/10/13
Report Reference:	ISE1
Condition number:	
1.1 No emission of acrylonitrile to air other than from tank pressure vacuum valves?	Compliant.
1.2 Any release other than pressure release system shall require investigation and notification.?	Compliant.
1.3 No offensive odours beyond the site boundary?	No offensive odour during visit.
1.4 Maximum estimated annual release still correct on permit?	Yes.
1.5 Max emission for each tank correct?	Yes.
2.1 Correct tanks?	Yes.
2.2 Storage facility equipped with mechanical seals and high temperature protection?	Yes.
2.3 Storage tanks painted with reflective colour?	Yes.

Where is drum storage area of acrylonitrile.

- Check flow monitoring system used for leak detection.
- Is TDI stored at present? Y/N

 Report Reference: - Toluene Di-isocyanate

POLLUTION PREVENTION & CONTROL

<p>2.4 Storage tanks equipped with:</p> <p>Roof mounted PRV</p> <p>Flame detonation trap in the vapour lines</p> <p>Level gauging and remote high level alarms. Deluge facilities for the cooling the tank</p>	<p>— Yes</p> <p>— Yes</p> <p>— Yes</p> <p>— Yes</p>
<p>2.5 Integrity of bunding maintained? What checks are in place?</p>	<p>Yes. daily checks and included in maintenance programme.</p>
<p>2.6 Dedicated vapour return line</p>	<p>Yes</p>
<p>2.7 Road transfer station serving 700 series tanks. Concrete surface & suitable drainage via interceptor.</p>	<p>Yes</p>
<p>2.8 Rail loading</p>	<p>—</p>
<p>2.9 Factory pipeline equipment</p>	
<p>2.10 Drum storage area have paved surface with closed drainage system?</p>	<p>Yes</p>
<p>3.1 Ship imports and exports</p>	<p>— Checked procedures for imports and exports</p>
<p>3.2 Road imports</p>	<p>N/A</p>
<p>3.3 Drum imports</p>	<p>No drum imports at present.</p>
<p>3.4 Road exports</p>	<p>Checked loading procedures and area</p>
<p>3.5 Rail export</p>	<p>N/A</p>
<p>3.6 Pipeline export</p>	<p>Compliant</p>
<p>3.7 Drum exports</p>	<p>N/A</p>
<p>4.1 Monitoring</p>	<p>Compliant</p>
<p>4.2 Site log</p>	<p>Checked</p>
<p>4.3 Records kept 2 years</p>	<p>Yes</p>
<p>4.4 Emergency telephone number provided to NELC</p>	<p>Yes</p>
<p>4.5</p>	
<p>4.6 Flame detonation trap pressure/vacuum valves checked every 6 months and records kept on findings</p>	<p>Yes. Checked documents</p>
<p>4.7 Storage filling tanks monitored via level gauges and have high level alarm?</p>	<p>Yes</p>
<p>4.8 Emission assessment daily at road loading location. Weekly at bund</p>	<p>Yes</p>

POLLUTION PREVENTION & CONTROL

walls at 500 and 700 tank locations – recorded?	Yes.
4.9 Export pipeline examined once a month?	Yes monthly walk the line checks completed.
4.10 Breakdowns regulator notified?	Yes.
5.1 Inspection of storage tanks, pipeline, hoses and abatement equipment. Records?	pipeline integrity check report March 2013 - Record available. Testex. complete tank checks. checked SO3 - given 10 year life.
6.1 No TDI on site	} N/A
6.2 at present	
6.3	
6.4	
7.1 Air Quality	—
7.2 Benzene objectives	—
7.3 Management techniques/ breakdowns	Ok.
7.4 Appropriate management system?	Yes.
7.5 Training?	Yes.
7.6 Planned preventative maintenance programme?	Yes. Agility system.

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	10
(B) No such air pollution problems	0	

Total Score for Environmental Impact Appraisal	Range 0 to 70	52
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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	Y 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	N/A 0
Total score	(-5 to 30)			0

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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
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OVERALL SCORE FOR THE PROCESS	Range -10 to 175	52
REGULATORY EFFORT CATEGORY * high=score of >80, medium 40-80 and low <40	LOW, MED, HIGH	MED.

Officer: VICKY WRAY.

Officer Signature: 

Operator Signature

 P. Wrayson.

Date: 8/10/13.