

## PERMIT CONDITIONS COMPLIANCE CHECK REPORT

<b>Installation Address:</b>	Ultimate Packaging Ltd Pegasus Way. Europarc. Grimsby DN37 9TS
<b>Contact:</b>	Lee Gray
<b>Permit Ref:</b>	EP/200500009
<b>Date of Varied Permit:</b>	
<b>Permitted activity:</b>	Printing of flexible packaging
<b>Guidance Note:</b>	PG6/17 (04)
<b>Date of Visit:</b>	21/08/13.
<b>Report Reference:</b>	UP1
<b>Condition number:</b>	
VOC's removed by the use of a thermal regenerative oxidation plant	
Table 4 – Non-voc emission limits CO – from oxidation plant and turbines or boilers  Nitrogen dioxide – from oxidation plant, turbines – annual  Sulphur content in fuel (gas oil used) – certification	CO – CONTINUOUS = 0.4 daily log completed by staff on compressor oxidizer on continuous. CO – annual = 93.13. EPM conduct monitoring. N02 – ANNUAL = 0 conduct 30th July 2013. - to re-check correct ref conditions used. N/A e
<b>Emission and Fugitive limits</b> used for VOC compliance option. Reduction Scheme not used	<hr/>
<b>NON- SED – Emission limits in Table 5</b> (Reduction Scheme not used) <i>not on reduction scheme</i>	VOC expressed as total carbon excluding particulate. <i>use temp as surrogate.</i> Abated releases continuous = plus annual = 9.08 o.k.  Non –abated releases annual =
<b>5.4 Reference conditions</b>	

Report Reference: -

VOC used EN13526 standard.  
what standard has been used for  
CO BSEN13526 o.k.

## POLLUTION PREVENTION & CONTROL

<b>SED Box 6</b> Designated Risk Phrase Materials used?	data sheet for products or records no specified Risk phrase used.
<b>5.14</b> Records kept of monitoring and inspections?	Yes, daily checks on oxidiser recorded.
<b>5.15</b> Results of annual extraction tests forward to NELC? Adverse results investigated?	Compliant
<b>5.16</b> Any odours beyond site boundary / visible emissions?	no visible emissions or odour beyond site boundary
<b>5.17</b> Abnormal events investigated?	Yes.
<b>5.18</b> Appropriate measures taken to minimise emissions during start-up and shut down?	Yes
<b>5.19</b> Exhaust flow rates of waste gases consisted with efficient capture of emissions?	Yes.
<b>5.20</b> Continuous indicative monitor with trigger alarm? What are the levels?	Yes continuous monitor.
<b>5.21</b> Thermal oxidiser has continuous monitor for total carbon excluding PM or TEMPERATURE can be used as surrogate?	What temperature =  Alarm trigger temperature = 750.
<b>5.22</b> Activation of alarms recorded? Calibration of continuous monitor and maintained?	Yes.
<b>5.23</b> Compliance monitoring met?	Yes but CO level high!
<b>5.24</b> CO – ISO 12039? NO2 – ISO 10849?	
<b>Control Techniques</b>	
<b>Table 7</b>	
<b>6.2</b>	
<b>6.3</b>	
<b>6.4</b>	
<b>6.5</b> All potentially odorous waste materials stored in suitably closed containers or bulk	Yes, ensure all containers with potential odorous waste materials stored outside for closed and lidded

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storage vessels?	
<b>6.6</b>	
<b>6.7</b> voc – Delivery connections to bulk storage tanks located in bunded area?	Yes.
<b>6.8</b>	
<b>6.9</b> Use of organic solvent wipes?	wipes placed in self metal - self closing bins then moved to storage area in ventilated room.
<b>6.10</b> A programme to monitor and record consumption of inks/ coatings/organic solvents against product produced to minimise amount of excess solvent use?	Ink and solvent usage recorded and product produced. Data provided to NELC for E-PRTR.
<del>6.11</del> <i>Cleaning operations</i>	
<b>6.12</b> Spillage Control Spillage equipment available and good house keeping?	Spill kits checked all o.k. Good house keeping.
<del>6.13</del> <i>6.9</i>	Printer / machine rollers have automatic self clean system.
<b>6.14</b>	Stacks checked as o.k.
<b>6.15</b>	
<b>6.16</b>	
<b>6.17</b>	
<b>6.18</b>	
<b>6.19</b>	
<b>6.20</b> Staff training levels	policy and procedure manual available
<b>6.21</b> Effective maintenance programme?	RTO last serviced 17th July. Twice a year.

# 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	20
(C) Category 3	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>32</b>
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## POLLUTION PREVENTION & CONTROL

### Operator Performance Appraisal

<b>Component 5 - Compliance Assessment</b>		
<b>Scale of Non-Compliance (Within 12 month period prior to review)</b>	<b>Possible Scores</b>	<b>Score Awarded</b>
(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.

<b>Scoring for Component 6 - Assessment of Monitoring, Maintenance and Records</b>				
<b>Criterion</b>	<b>Possible Scores</b>			<b>Score Awarded</b>
	<b>(x) Yes</b>	<b>(y) No</b>	<b>(z) N/A</b>	
(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

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<b>Component 7 - Assessment of Management, Training and Responsibility</b>				
<b>Criterion</b>	<b>Possible Scores</b>			<b>Scores Awarded</b>
	<b>(x) Yes</b>	<b>(y) No</b>	<b>(z) N/A</b>	
(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>			<b>-5</b>

<b>Total Score for Operator Performance Appraisal</b>	<b>Range -10 to 105</b>	<b>-5</b>
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<b>OVERALL SCORE FOR THE PROCESS</b>	<b>Range -10 to 175</b>	<b>27</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: V. Wray

Officer Signature: VICKY WRAY

Operator Signature

Date: 21/08/13

