

PERMIT CONDITIONS COMPLIANCE CHECK REPORT

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|---|---|
| Installation Address: | Dunlop Oil and Marine Ltd Moody Lane Pyewipe Grimsby DN31 2SP |
| Contact: | Chris Allen |
| Permit Ref: | EP/20020004 |
| Date of Varied Permit: | |
| Permitted activity: | Rubber process |
| Guidance Note: | 6/28(04) |
| Date of Visit: | 15/01/14 |
| Report Reference: | DOM1 |
| Condition number: | |
| 5.1 Table 3. PM annual extractive 10mg/m ³ for bag filtration unit. 50 mg/m ³ for Banbury Mixer. Isocyanate 0.1mg/m ³ | Test completed on 19th Nov 2013 Sampling point 1 and 2 Compliant for Particulate Emission concentration. Personnel Isocyanate test completed - |
| 5.2 Table 4 PART 2 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 - copy to be forwarded for Licensed hazardous waste disposal agents used? review to permit. Greenway collect hazardous waste. receipts available. Solvent used vs rubber processed? - To forward via email Target Value = Solvent consumption in 1992/Tonnes of rubber used x 0.5? |
| 5.3 Reference Conditions 273.15K, 101.3kPa | Correct ref conditions employed. |
| 5.4 Reduction Scheme | Reduction Scheme |
| 5.5 50% reduction (0.62) solvent usage | |
| 5.6 Low or organic solvent coating system used? | currently looking into review of the bonding agent. |

* VW to issue letter to confirm extraction test for Isocyanate 3 years

POLLUTION PREVENTION & CONTROL

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|---|---|
| 5.7 | Informative |
| 5.8 | Informative |
| 5.9 | Solvent Management Plan |
| Risk Phrase Materials R40, R45, R46, R49, R60, R60 | No changes to previous year. |
| 5.11 Monitoring records available? | Yes. |
| 5.12 Regulator informed in advance of annual test? | Yes receive notification via email |
| 5.13 Visible emission during visit or odour beyond site boundary? | |
| 5.14 Silo | No silo's |
| * 5.15 Inspection of filtration plant? Carbon black storage and empty bags | Is bag filter or cartridge used? Are pressure drop sensors used to monitor arrestment plant? Empty bags that have contained carbon black placed in stored containers? |
| 5.16 Abnormal event procedure and records | Spillage procedures. CA to look into developing emergency preparedness procedure. |
| 5.17 | |
| * 5.18 LEV Maintenance certificate? | 6 monthly internal checks on filters and extraction. |
| 5.19 | Cartridge filters have automatic self clean - reverse jet. |
| 5.20 Calibration Certificates? | |
| 5.21 Test methods Nitrogen Dioxide ISO 10649? PM ISO 12039? | PM followed BS ISO 9096. |
| 5.22 | |
| 5.23 | |
| 5.24 | |
| 6.1 Control techniques | |
| 6.2 | Ducting clean and inspection every 2 years. |
| 6.3 | |
| 6.4 | |

POLLUTION PREVENTION & CONTROL

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| 6.5 | |
| 6.6 | |
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| 6.9 | |
| 6.1 | |
| 6.11 | |
| 6.12 | |
| 6.13 | |
| 6.14 VOC control waste How and where are waste drums stored? Lids on? | X paints etc review storage procedure for collection to be recycled. |
| 6.15 | No-solvent wipes used. |
| 6.16 Spillage kit? Good housekeeping? | 2 vacuums for spillage of carbon black. House keeping ok. |
| 6.17 | |
| 6.18 | |
| 6.19 | |
| 6.20 | |
| 6.21 See stack and Ducts – are they checked? | Every 2 years – due next year. |
| 6.22 Maintenance Programme | 6 monthly internal checks External 28 Feb 2013 by Allianz |
| 6.23 Management System? | |
| 6.24 Training | Ref WI-PI-023 – Extraction Unit training / procedure records available. |

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 | |
| (B) No such air pollution problems | 0 | 0 |

| | | |
|---|----------------------|-----------|
| Total Score for Environmental Impact Appraisal | Range 0 to 70 | 33 |
|---|----------------------|-----------|

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 | |
| (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 problems indicated by monitoring? | 0 | 5 | 0 | N/A 0 |
| (D) Fully documented and adhered to maintenance programme, in line with authorisation? | | | | 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 |
| Total score | (-5 to 30) | | | 0 |

- review contains storage (point).

Component 7 - Assessment of Management, Training and Responsibility

POLLUTION PREVENTION & CONTROL

| 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 |

Emergency res. procedure review to be completed

| | | |
|---|-------------------------|------------|
| Total Score for Operator Performance Appraisal | Range -10 to 105 | 330 |
|---|-------------------------|------------|

| | | |
|--|-------------------------|------------|
| OVERALL SCORE FOR THE PROCESS | Range -10 to 175 | 33 |
| REGULATORY EFFORT CATEGORY * high=score of >80, medium 40-80 and low <40 | LOW, MED, HIGH | LOW |

Officer: VICKY WRAY

Officer Signature: 

Operator Signature 

Date: 15/01/14