

## PERMIT CONDITIONS COMPLIANCE CHECK REPORT

<b>Installation Address:</b>	Simon Storage Ltd Immingham Storage Company Ltd Immingham East Terminal Immingham Dock North East Lincolnshire DN40 2QW
<b>Contact:</b>	Phil Dyson
<b>Permit Ref:</b>	EP/200200044
<b>Date of Varied Permit:</b>	
<b>Permitted activity:</b>	Bulk storage of chemicals
<b>Guidance Note:</b>	
<b>Date of Visit:</b>	18/06/14
<b>Report Reference:</b>	ISE1
<b>Condition number:</b>	
<b>1.1</b> No emission of acrylonitrile to air other than from tank pressure vacuum valves?	o.k.
<b>1.2</b> Any release other than pressure release system shall require investigation and notification.?	No release .
<b>1.3</b> No offensive odours beyond the site boundary?	No offensive odour beyond site boundary.
<b>1.4</b> Maximum estimated annual release still correct on permit?	Estimated via software - Provided to <del>the</del> NELC.
<b>1.5</b> Max emission for each tank correct?	—
<b>2.1</b> Correct tanks?	Yes. some not in service, logged.
<b>2.2</b> Storage facility equipped with mechanical seals and high temperature protection?	Yes.
<b>2.3</b> Storage tanks painted with reflective colour?	Yes.

Most maintenance records have now moved over to agility

## POLLUTION PREVENTION & CONTROL

<b>2.4 Storage tanks equipped with:</b> Roof mounted PRV Flame detonation trap in the vapour lines Level gauging and remote high level alarms. Deluge facilities for the cooling the tank	Yes.
<b>2.5 Integrity of bunding maintained?</b>	Yes
<b>2.6 Dedicated vapour return line</b>	Yes.
<b>2.7 Road transfer station serving 700 series tanks.</b> Concrete surface & suitable drainage via interceptor.	Yes.
<b>2.8 Rail loading</b>	Not currently used.
<b>2.9 Factory pipeline equipment</b>	line currently closed.
<b>2.10 Drum storage area have paved surface with closed drainage system?</b>	No drums in use at present.
<b>3.1 Ship imports and exports</b>	Ship import check list o.k. (Pig Line check). Checked ship logs.
<b>3.2 Road imports</b>	—
<b>3.3 Drum imports</b>	N/A
<b>3.4 Road exports</b>	—
<b>3.5 Rail export</b>	N/A.
<b>3.6 Pipeline export</b>	N/A
<b>3.7 Drum exports</b>	not used at present.
<b>4.1 Monitoring</b>	Spillage + vapour release action plan in place. (Emergency Plan Procedure)
<b>4.2 Site log</b>	— Incident investigation reporting procedure available.
<b>4.3 Records kept 2 years</b>	Incidents logged on KPI system.
<b>4.4 Emergency telephone number provided to NELC</b>	Yes.
<b>4.5</b>	Daily checks for odours + visual around tanks.
<b>4.6 Flame detonation trap</b> pressure/vacuum valves checked every 6 months and records kept on findings	BIF on agility some checked 3 6 monthly on det traps. PVV checked 6 monthly. o.k.
<b>4.7 Storage filling tanks monitored via level gauges and have high level alarm?</b>	Yes. <del>N/A checked internally 3 monthly 6 monthly externally. Ribble.</del>
<b>4.8 Emission assessment</b> daily at road loading location. Weekly at bund	Yes.

monthly walk check on line to Bluestar. checked last complete June. 2014. Line currently not in use.

## POLLUTION PREVENTION & CONTROL

walls at 500 and 700 tank locations – recorded?	Yes.
<b>4.9 Export pipeline</b> examined once a month?	Yes – recorded on agility.
<b>4.10 Breakdowns</b> regulator notified?	Yes.
<b>5.1 Inspection</b> of storage tanks, pipeline, hoses and abatement equipment. Records?	Daily checks completed.
<b>6.1</b>	
<b>6.2</b>	
<b>6.3</b>	
<b>6.4</b>	
<b>7.1 Air Quality</b>	///
<b>7.2 Benzene objectives</b>	///
<b>7.3 Management techniques/ breakdowns</b>	Yes procedures and training documented.
<b>7.4 Appropriate management system?</b>	
<b>7.5 Training?</b>	Competency matrix. checked shipping operations - o.k.
<b>7.6 Planned preventative maintenance programme?</b>	Yes agility system used.

## 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	10
(B) No such air pollution problems	0	

<b>Total Score for Environmental Impact Appraisal</b>	<b>Range 0 to 70</b>	<b>52</b>
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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
<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 Y 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**

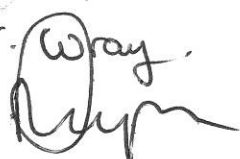
<b>Component 7 - Assessment of Management, Training and Responsibility</b>				
<b>Criterion</b>	<b>Possible Scores</b>			<b>Scores Awarded</b>
	<b>(x) Yes</b>	<b>(y) No</b>	<b>(z) N/A</b>	
(A) Documented procedures in place for implementing all aspects of the authorisation?	0	5	0	Y 0
(B) Specific responsibilities 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	N/A 0
<b>Total</b>	<b>(-5 to 25)</b>			<b>0</b>

<b>Total Score for Operator Performance Appraisal</b>	<b>Range -10 to 105</b>	<b>0</b>
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<b>OVERALL SCORE FOR THE PROCESS</b>	<b>Range -10 to 175</b>	<b>52</b>
<b>REGULATORY EFFORT CATEGORY</b> * high=score of >80, medium 40-80 and low <40	<b>LOW, MED, HIGH</b>	<b>MED</b>

Officer: VICKY WRAY

Officer Signature: V. Wray

Operator Signature 

Date: 18/06/14