

POLLUTION PREVENTION & CONTROL



PERMIT CONDITIONS COMPLIANCE CHECK REPORT

Installation Address:	RD Ports – ABP – West Gate
Contact:	Tony Randall Tony Randall
Permit Ref:	EP/201300001 EP/200700001/VI
Date of Varied Permit:	New operator transferred 26th June 2014
Permitted activity:	Process using coal, coke, coal product and petroleum coke
Guidance Note:	PG3/5 (12) – Part 3 Reduced Fee activity. Throughput of coal is NOT to exceed 250,000 tonnes over any 12-month period.
Date of Visit:	28/7/14
Report Reference:	
Condition number:	
1 No visible emissions of particulate matter beyond site boundary?	No emission beyond site boundary during visit.
2 Monitoring completed as required within Table 1 of permit?	Yes recorded every 3hrs in log.
3. N/A no arrestment plant	
4 Maintenance completed and recorded for plant and equipment capable of causing, or preventing, emissions?	Yes - checked daily wheel wash. * Any service requirements to be included in PPM system.
5 Correct storage areas in use? Suitable suppression and management techniques employed to minimise emissions?	Polymer arrangements in place * if product to be moved more frequently may need on site rainbird/suppression system.
6. Stockpiles profiled with no peaks or ridges?	O.k some overhanging ridges
7 Unused stocking areas cleaned and regularly wetted until brought back into use?	need to inform staff to leave access for bowser at side of stockpile.
8 Vehicles carrying coal product fully sheeted when arriving or leaving site? Vehicles not overfilled?	Yes - in haulage contract.
9 N/A Loading of Ships	—
10 N/A Loading of Ships	—
11 Roadways kept clean or wet. Internal haul roads maintained and clearly delineated.	Yes ABP have roadway check programme. and sweepers employed
12 Vehicles have clean wheel and underbody before leaving site?	YES - checked working during visit
13 Hard surface provided between under-vehicle washing facility and site	Yes.

Report Reference: -

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exit?	
14 Buildings maintained dust tight and doors kept closed?	Yes
15 Records of monitoring and test available for at least 24 months?	Yes
16 Staff training and records	Yes - tool box talk. (need to check sign off sheet)
17 BAT	/
18 Notification	/

Risk Assessment Score Sheet

Environmental Impact Appraisal – N/A for reduced fee activity

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	

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

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(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	N/A REDUCED FEE ACTIVITY
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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	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?				N/A for reduced fee activity
(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	10	0	N/A 0
Total score	(0 to 35)			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	0
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OVERALL SCORE FOR THE PROCESS	Range	0
REGULATORY EFFORT CATEGORY * high=score of >60, medium 30-60 and low <30	LOW, MED, HIGH	LOW

Officer Signature: *V. Wray*

Operator Signature: *M. L. L.*

Date: *18/07/14*