

PERMIT CONDITIONS COMPLIANCE CHECK REPORT

Installation Address:	Phillips 66 Ltd Immingham Pipeline Centre Immingham Docks Immingham North East Lincolnshire DN40 2PB
Contact:	Sarah Catmull / Kevin Burnett
Permit Ref:	EP/200200097V2
Date of Varied Permit:	
Permitted activity:	Petrol Vapour Recovery
Guidance Note:	PG1/13
Date of Visit:	
Report Reference:	CP97/1
Condition number:	
1.1 External wall and roof of tanks painted with colour with light reflectance of 70% or more.	Yes
1.2 Existing roof tanks, T8013, T8014 and T8034 have internal floating roof fitted with primary seals?	Usually 20yr life on tanks.
1.3 Any changes/ new tanks in use?	No changes.
2.1	
2.2 The mean concentration of vapours in the exhaust from the vapour recovery unit – corrected for dilution during treatment – must not exceed 35g/m ³ for any one hour.	Yes - readings compliant during visit.

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<p>2.3 All pollutant concentrations expressed at reference conditions 273K, 101.3kPa without correction for water vapour.</p>	
<p>2.4 Emissions from vapour recovery unit continuously monitored? Twelve month calibration documented/certificate?</p>	<p>Yes & calibrated internally and recorded.</p>
<p>2.5 Regulator notified 7 days before any planned maintenance of the vapour recovery unit?</p>	<p>Yes – notified via email</p>
<p>2.6 annual inspection completed of all pipework, flexible hoses, joints and connections to confirm integrity and security? Is it logged?</p>	<p>Yes - Sarah to forward. Flexible hose checks.</p>
<p>2.7 Procedure for vapour leak detected? Where practical shut down? Operating instructions available to loading personnel includes detection of leaks, reporting of and shutdown?</p>	<p>Yes. - Covered under driver training.</p>
<p>2.8 Top loading system – written instructions to keep outlet of loading arm as close to the bottom of the mobile container as reasonably practical?</p>	<p>Covered under driver training.</p>
<p>3.1</p>	
<p>3.2 What is the normal liquid loading rate? (less than 2,500 litres per minute?)</p>	<p>Max 2,000ltrs per minute all controlled automatically.</p>
<p>3.3</p>	
<p>3.4 Loading gantries equipped with an overfill detection control unit?</p>	<p>Yes. Sensor tested every 6 months - SC to forward.</p>
<p>3.5</p>	
<p>3.6 Is the gantry control unit suitable for two wire system?</p>	
<p>3.7</p>	<p>* SV to forward roplex service on VRU.</p>
<p>3.8</p>	

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3.9 The earth/overflow connector located to the right of the liquid and vapour collection adapters below 1.5 meters (unladen)?	Yes.
3.10 Loading shall not be permitted unless a permissive signal is provided by the earth overflow control unit?	Yes.
3.11	
4.1 Site log available with records of monitoring and maintenance kept?	Yes.
4.2 Breakdowns or malfunctions leading to abnormal emission dealt with immediately and reported to regulator?	Yes - email received. P66 notify work on VPO to NELC. Compliant.
5.1 Proper management, supervision and training for process operations?	Yes.
5.2 Staff training and instruction	Checked road loading training.
5.3 Effective preventative maintenance	SAP system raises jobs + daily checks

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	

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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
<p>* 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.</p>			
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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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)	○
<p>* 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.</p>		

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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?	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
Total score	(-5 to 30)			0

* P66 to forward said docs

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 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: *V. Wray*

Operator Signature *[Signature]*

Date: 16/07/13.

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