

PERMIT CONDITIONS COMPLIANCE CHECK REPORT

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| Installation Address: | Phillips 66 Ltd Immingham Pipeline Centre Immingham Docks Immingham North East Lincolnshire DN40 2PB |
| Contact: | Kevin Burnett |
| Permit Ref: | EP/200200097V2 |
| Date of Varied Permit: | |
| Permitted activity: | Petrol Vapour Recovery |
| Guidance Note: | PG1/13 |
| Date of Visit: | 25/08/15. |
| 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 inspection group responsible for maintenance programme. |
| 1.2 Existing roof tanks, T8013, T8014 and T8034 have internal floating roof fitted with primary seals? | Compliant. |
| 1.3 Any changes/ new tanks in use? | |
| 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. | * To check whether 3 yearly TOC test required at VRU outlet. |
| 2.3 All pollutant concentrations | |

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| expressed at reference conditions 273K, 101.3kPa without correction for water vapour. | / |
| 2.4 Emissions from vapour recovery unit continuously monitored? Twelve month calibration documented/certificate? | Yes. |
| 2.5 Regulator notified 7 days before any planned maintenance of the vapour recovery unit? | Yes – notified via email |
| 2.6 annual inspection completed of all pipework, flexible hoses, joints and connections to confirm integrity and security? Is it logged? | Yes regular checks completed. inspection group. complete PPS SAP system. |
| 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? | High level alarm ppm 6 monthly. Yes. Yes included in induction. |
| 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? | Yes card provided. and training |
| 3.1 | VRU internal checks. |
| 3.2 What is the normal liquid loading rate? (less than 2,500 litres per minute?) | * 2,000 litres per minute. |
| 3.3 | |
| 3.4 Loading gantries equipped with an overfill detection control unit? | Yes. |
| 3.5 | |
| 3.6 Is the gantry control unit suitable for two wire system? | yes. |
| 3.7 | |
| 3.8 | |
| 3.9 The earth/overfill connector | Yes. |

Report Reference: -

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| 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 overfill 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? | - Notification received. |
| 5.1 Proper management, supervision and training for process operations? | Yes. |
| 5.2 Staff training and instruction | Yes. |
| 5.3 Effective preventative maintenance | Yes. |

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 |

* 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 | 10 |
| (B) No such air pollution problems | 0 | |

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| 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) | ○ |

* 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.

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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 |

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 | Y -5 |
| Total | (-5 to 25) | | | -5 |

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| Total Score for Operator Performance Appraisal | Range -10 to 105 | -5 |
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| OVERALL SCORE FOR THE PROCESS | Range -10 to 175 | 47 |
| REGULATORY EFFORT CATEGORY * high=score of >80, medium 40-80 and low <40 | LOW, MED, HIGH | MED |

Officer: VICKY THOMPSON

Officer Signature: V. Thompson

Operator Signature: K. Smith

Date: 25/08/15

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