NORTH EAST LINCOLNSHIRE COUNCIL

Permit with introductory note

Pollution Prevention and Control (England and Wales) Regulations 2000 (as amended)

Installation address

Immingham storage Co Ltd
West Terminal
West Riverside
Immingham Docks
DN40 2QU

Permit Reference: 020043

Contact Details:

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Introductory note

This introductory note does not form a part of the Permit

The following Permit is issued under Regulation 10 of the Pollution Prevention and Control (England and Wales) Regulations 2000 (as amended) (S.I.2000 No. 1973) ("the PPC Regulations") to operate an installation carrying out one or more of the activities listed in Part B to Schedule 1 of those Regulations, to the extent authorised by the Permit.

The permit includes conditions that have to be complied with. It should be noted that aspects of the operation of the installation which are not regulated by those conditions are subject to the condition implied by Regulation 12(10) of the PPC Regulations, that the Operator shall use the best available techniques for preventing or, where that is not practical, reducing emissions from the installation.

Techniques include both the technology used and the way in which the installation is designed, built, maintained, operated and decommissioned.

Brief description and installation regulated by this permit

Process: Petrol Vapour Recovery as prescribed by Section 1.2 of Schedule I of the Pollution Prevention and Control (England and Wales) Regulations 2000 (as amended).
Simon Storage handles bulk fuels and chemicals from this facility.
Petroleum spirit is received at the terminal by ship, fixed pipeline and mobile tankers. It is stored in vertical, cylindrical tanks built to BS 2645 and set in bunded areas. Dispatch of petrol from the terminal can be via several routes. Only the loading of road tankers and inland waterway barges is coved by this permit.
The terminal is located in the highly industrialised area of Immingham Docks. It operates 24hours per day 365 days a year.

Superseded Licences/Consents/Authorisations relating to this installation		
Holder	**Reference Number**	**Date of Issue**
Immingham Storage Co Ltd	***EPA/PT-01/JM***	**14th September 1998**

Confidentiality

The Permit requires the Operator to provide information to North East Lincolnshire Council. The Council will place the information onto the public registers in accordance with the requirements of the PPC Regulations. If the operator considers that any information provided is commercially confidential, it may apply to North East Lincolnshire Council to have such information withheld from the register as provided in the PPC Regulations. To enable North East Lincolnshire Council to determine whether the information is commercially confidential, the Operator should clearly identify the information in question and should specify clear and precise reasons.

Variations to the permit

This Permit may be varied in the future. If at any time the activity or any aspect of the activity regulated by the following conditions changes such that the conditions no longer reflect the activity and require alteration, the Regulator should be contacted.

Surrender of the permit

Where an Operator intends to cease the operation of an installation (in whole or in part) the regulator should be informed in writing, such notification must include the information specified in regulation 20(3) of the PPC regulations.

Transfer of the permit or part of the permit

Before the Permit can be wholly or partially transferred to another person, a joint application to transfer the Permit has to be made by both the existing and proposed holders, in accordance with Regulation 18 of the PPC Regulations. A transfer will be allowed unless the Authority considers that the proposed holder will not be the person who will have control over the operation of the installation or will not ensure compliance with the conditions of the transferred Permit.

Responsibility under workplace health and safety legislation

This Permit is given in relation to the requirements of the PPC regulations. It must not be taken to replace any responsibilities you may have under Workplace Health and Safety legislation.

Appeal against permit conditions

Anyone who is aggrieved by the conditions attached to a Permit can appeal to the Secretary of State for the Environment, Food and Rural Affairs. Appeals must be made in accordance with the requirements of Regulation 27 and Schedule 8 of the PPC regulations.

Appeals should be received by the Secretary of State for Environment, Food and Rural Affairs. The address is as follows:

The Planning Inspectorate
Environmental Appeals Administration
Room 4/19 - Eagle Wing
2 The Square, Temple Quay
BRISTOL
BS1 6PN
Tel: 0117 372 8812
Fax: 0117 372 6093

Please Note

An appeal brought under paragraph (1)(c) or (d) in relation to the conditions in a permit will not suspend the effect of the conditions appealed against; the conditions must still be complied with.
In determining an appeal against one or more conditions, the Act allows the Secretary of State in addition to quash any of the conditions not subject to the appeal and to direct the local authority either to vary any of these other conditions.

End of introductory note

Permit issued under the Pollution Prevention and Control Regulations 2000

Permit Number 020043

North East Lincolnshire Council (the Regulator) in exercise of its powers under Regulation 10 of the Pollution Prevention and Control Regulations 2000 (S.I. 2000 No. 1973) hereby permits.

Simon Storage Ltd. ("the operator"),

Whose registered office is

Immingham Storage Co Ltd
Priory House
60 Station Road
Redhill
Surry
RH1 1PE

To operate an installation at

Immingham Storage Co Ltd
West Terminal
West Riverside
Immingham Docks
DN40 2QU

To the extent authorised by and subject to the conditions of this Permit and within the boundary identified in condition A

Signed

Tony Neul
Neighbourhood Services Manager
Authorised to sign on behalf of
North East Lincolnshire Council

Dated

12/1/06

CONDITIONS

Extent and limit of the installation

A The operator is authorised to carry out the activities and/or associated as specified and within the boundary shown on the plan below:-

Process: Petrol Vapour Recovery as prescribed by Section 1.2 of Schedule I of the Pollution Prevention and Control (England and Wales) Regulations 2000 (as amended).
Simon Storage handles bulk fuels and chemicals from this facility.
Petroleum spirit is received at the terminal by ship, fixed pipeline and mobile tankers. It is stored in vertical, cylindrical tanks built to BS 2645 and set in bunded areas. Dispatch of petrol from the terminal can be via several routes. Only the loading of road tankers and inland waterway barges is coved by this permit.
The terminal is located in the highly industrialised area of Immingham Docks. It operates 24hours per day 365 days a year.

5. Emission Limits, Monitoring and Other Provisions

5.1 The provisions of paragraphs 5.11 – 5.17 are designed to reduce the total annual loss of petrol resulting from loading and storage at each storage installation at terminals to below a target reference value of 0.01% by weight of the throughput.

5.2 The provisions of paragraphs 5.18 – 5.38 and Table 2 are designed to reduce the total annual loss of petrol resulting from the loading and unloading of mobile containers at terminals to below target reference value of 0.005% by weight of the throughout.

5.3 The Petrol Vapour Recovery (Stage 1) (Local Enforcing Authorities) Direction and Notice 1996 directs local enforcing authorities, and the Petrol Vapour Recovery (Stage 1) (Scottish Environment Protection Agency) Direction and Notice 1996 directs SEPA, to include conditions in any authorisations granted to petrol storage terminal operators to secure that equipment is designed and operated in accordance with paragraphs 5.11 – 5.17, paragraphs 5.18 – 5.38 and Table 2.

5.4 The Direction allows no alternative technical measures to those in paragraphs 5.11 – 5.17, paragraphs 5.18 – 5.38 and Table 2.

5.5 However, the Directive gives discretion to Member States to adopt different measures if they are demonstrated to have at least the same efficiency. Any such alternative measures would need to be approved by the Department for the Environment, Food and Rural Affairs, Welsh Assembly Government or Scottish Executive (as appropriate), who would need to issue a further Direction. Operators, SEPA or local enforcing authorities must, therefore, seek and obtain such a Direction from the Department for the Environment, Food and Rural Affairs, National Assembly for Wales or Scottish Executive (as appropriate) before deviating from paragraphs 5.11 – 5.17, paragraphs 5.18 – 5.38 and Table 2.

5.6 The reference conditions for limits in Table 2 are the normal conditions of 273K, 101.3 kPa, without correction for water vapour. N means normal conditions. The introduction of dilution air to achieve emission concentration limits should not be permitted.

Table 2: Emission Limits, Monitoring and Other Provisions

Row	Source	Total *Organic* Carbon	Emission *Limits /* Provisions	Type of *monitoring*	Monitoring Frequency
1	Vapour recovery *units* If installed before 1 January 93 and still at same location	Total organic *carbon*	-50g/Nm³ as 1 hourly average *-regulator must* notify Government see paragraph 2.13 – upgrade to Row 2 by 31 December 2004	In PG note 1/13 (04) Use test in Appendix 6, or an alternative that complies with Directive Annex II (Appendix 3) See 5.6	Each unit tested once every 3 years
2	All other vapour recovery units and vapour incineration units	Total organic carbon	35g/Nm³ as 1 hourly average		

Monitoring, Investigations and Recording

5.7 The need for and scope of testing, and the frequency and time of sampling depend on local circumstances, operational practice and the scale of operation. As part of proper supervision the operator will monitor emissions, make tests and inspections of the process and keep records, in particular:

The operator should keep records of inspections, tests and monitoring, including all non-continuous monitoring, inspections and visual assessments. The records should be:

- kept on site
- kept by the operator for at least two years; and
- made available for the regulator to examine

Information Required by the Regulator

5.8 The regulator needs to be informed of monitoring to be carried out and the results; the results should include process conditions at the time of monitoring.

- The operator should provide a list of key arrestment plant and should have a written procedure for dealing with its failure, in order to minimise any adverse effects.

- The operator should notify the regulator at least 7 days before any periodic monitoring exercise to determine compliance with emission limit values. The operator should state the provisional time and date of monitoring, pollutants to be tested and the methods to be used. (See PG 1/13 (04) Appendix 6 Compliance Test Method for Vapour Recovery Units).

- The results of non-continuous emissions testing should be forwarded to the regulator within 8 weeks of the completion of the sampling.

- Adverse results from any monitoring activity (both continuous and non-continuous should be investigated by the operator as soon as the monitoring data has been obtained / received. The operator should:

    - Identify the cause and take corrective action
    - Record as much detail as possible regarding the cause and extent of the problem, and the action taken by the operator to rectify the situation
    - Re-test to demonstrate compliance as soon as possible; and
    - Notify the regulator

Abnormal Events

5.9 The regulator needs to be notified about certain events, whether or not there is related monitoring showing an adverse result, and the operator should respond to problems which may have an adverse effect on emissions to air.

- In the case of abnormal emissions, malfunction or breakdown leading to abnormal emissions the operator should:

    - Investigate and undertake remedial action **immediately**
    - Adjust the process or activity to minimise those emissions; and
    - Promptly record the events and actions taken
    - In the case of repeated failure of the vapour recovery unit, the operator should submit, and implement to a timetable, proposals to improve the operating efficiency of the unit.

- The regulator should be informed without delay
    - If there is an emission that is likely to have an effect on the local community such as odour.

Storage Installations

5.10 Paragraphs 5.11 – 5.17 apply to loading and storage in fixed tanks at terminals to the extent and by the dates specified in paragraphs 2.3 and 2.10. (in PG note 1/13 (04)

5.11 The external wall and roof of tanks above ground must be painted in a colour or colours with a total radiant heat or light reflectance of 70% or more, unless the tank is linked to a vapour recovery unit which conforms to the standards in paragraph 5.4 and Table 2 of this note. Repainting should be carried out within a period of three years after the dates mentioned in paragraphs 2.3, 2.7, 2.10 and 2.12. This paragraph should not require the replacement of tanks with internal or external floating roofs with fixed roof tanks connected to a vapour recovery unit.

Such painting should not be required where the tanks are situated in special landscape areas such as national parks, the Broads, the New forest and Areas of outstanding Natural Beauty or which are visible from such an area. In any event, a close liaison with the local planning authority responsible for developing control should be maintained.

5.12 Tanks with external floating roofs must be equipped with a primary seal to cover the annular space between the tank wall and the outer periphery of the floating roof and with a secondary seal fitted above the primary seal. The seals must be designed to achieve an overall containment of vapours of 95% or more as compared to a comparable fixed roof tank with no vapour containment controls (that is a fixed roof tank with only vacuum / pressure relief valve).

An external floating roof and seal system should be deemed to achieve an overall containment of vapours of 95% or more compared to a comparable fixed roof tank solely fitted with pressure / vacuum relief valves if:

- The roof is fitted with both primary and secondary seals;
- The primary seal extends from the floating roof to the tank wall and the secondary seal is fitted above it; and
- The seal system is designed to accommodate variations in the gap between the floating roof and the tank wall, and the tank and the roof comply with the requirements of BS 2654 (Manufacture of Vertical Steel Welded Storage Tanks with Butt-welded shells for the Petroleum Industry) or equivalent.

Floating roofs should be landed as infrequently as possible to avoid vapour release on recommissioning.

5.13 All new storage installations at terminals where vapour recovery is needed to comply with the provisions in paragraphs 5.18 – 5.23 and Table 2, shall be either:

5.14 Fixed roof tanks connected to a vapour recovery unit in conformity with the standards in Table 2 and paragraphs 5.4, or

- Tanks designed with a floating roof, either external or internal, equipped with primary and secondary seals to meet the performance standards set down in paragraph 5.12 above. See Ref (PG note 1/13 04)

5.15 An internal floating roof and seal system installed in a new tank should be deemed to achieve an overall containment of vapours of 95% or more compared to a comparable fixed roof tank solely fitted with pressure / vacuum (P/V) relief valves (See Ref (h) and (i) if:)

- The roof is fitted with both primary and secondary seals
- The primary seal extends from the floating roof to the tank wall and the secondary seal is fitted above it
- The seal system is designed to accommodate variations of the gap between the floating roof and the tank wall, and the tank and the roof complies with the requirements of BS 2654 or equivalent, and
- The roof and seal systems are designed and installed as per the Institute of Petroleum "Internal floating Roof's for Oil Storage Tanks Code of Practice". August 1991

5.16 Existing fixed roof tanks must either:

- Be connected to a vapour recovery unit in conformity with the standards in Table 2 and paragraphs 5.4
- Or have an internal floating roof with a primary seal which should be designed to achieve an overall containment of vapours of 90% or more in relation to a comparable fixed roof tank with no vapour controls

5.17 An internal floating roof and seal system should be deemed to achieve an overall containment of vapours of 90% or more compared to comparable fixed roof tank solely fitted with pressure / vacuum (P/V) relief valves (See Ref (h) and (i)) if:

- The roof is fitted with a primary seal

- The seal extends from the floating roof to the tank wall

- The seal is designed to accommodate variations in the gap between the floating roof and the tank wall, and the rank and the roof complies with the requirements of BS 2654 or equivalent, and

- The roof and seal are designed and installed as per the Institute of Petroleum "Internal Floating Roofs for Oil Storage Tanks Code of Practice" (*See Ref (i)*)

  The provisions of this paragraph should not be applied to existing horizontal tanks or to existing vertical tanks with a diameter less than 6 mts, at terminals with a throughput of less than 10,000 tonnes per year.

5.18 The standards for vapour containment controls in paragraphs 5.13 – 5.16 shall not apply to:

- Fixed roof tanks at terminals where intermediate storage of vapours is permitted under paragraph 5.22

- Tanks which receive dumped product mixtures, such as interface tanks and slop tanks. Such mixtures contain, but are not wholly comprised of, petrol.

Loading and Unloading of Mobile Containers at Terminals

5.19 Paragraphs 5.19 – 5.24 and Table 2 apply to the loading and unloading of mobile containers to the extent and by the dates specified in paragraphs 2.4 and 2.11.

5.20 Displacement vapours from the mobile container being loaded must be returned through a vapour tight connection line to a vapour recovery unit for recovery at the terminal.

This provision does not apply to top loading tankers as long as that loading system is permitted.

5.21 At terminals that load petrol onto vessels, a vapour incineration unit may be substituted for a vapour recovery unit if vapour recovery is unsafe or technically unfeasible because of the volume of return vapour. The standards concerning air emissions from vapour recovery units in Table 2 and paragraphs 5.4 also apply to vapour incineration units.

5.22 At terminals with a throughput of less than 25,000 tonnes per year, intermediate storage of vapours may be substituted for immediate vapour recovery at the terminal.

Vapour balancing systems should be designed in accordance with the Institute of Petroleum's Guidelines for the Design and Operation of Gasoline Vapour Emission Controls. See Ref (i).

Operators of terminals with intermediate vapour storage systems should have written procedures for the operation of such systems including instructions on the connection of vapour hoses or arms to mobile containers prior to the off-loading of petrol from them into any tanks used for intermediate vapour storage, and their subsequent disconnection at the completion of off-loading.

5.23 Vapour collection pipework, except for flexible hoses, should be tested prior to initial commissioning as follows:

- Where systems are made up of prefabricated lengths joined together mechanically, each length (including any permanent attachment of the jointing mechanism) should be tested to a minimum pressure of 1 bar for a period of one hour. Assembly of mechanical joints should be subject to inspection;

- Where the systems are assembled with permanent joints (for example, welded cemented) they should be tested to the above requirement on completion.

In-service monitoring should comprise an annual visual examination of the system to check for integrity and alignment of the pipework and the joints.

An annual visual examination of bellows and flexible hoses used to connect mobile containers to the vapour collection pipework should be undertaken to check for integrity, wear and security of connections.

5.24 If a leak occurs in the vapour collection system (including the vehicle) at a gantry during loading of an approved bottom loading vehicle, operations at that gantry shall be shut down until the leak is sealed. Equipment to facilitate such shut down operations shall be installed at the loading gantry. Operating instructions to loading personnel shall include provisions regarding the detection of leaks and reporting and shut down procedures.

5.25 Operators of top loading systems for petrol must have written procedures instructing loading personnel to keep the outlet of the

loading arm as near to the bottom of the mobile container as practicable during loading.

Gantries

5.26 Paragraphs 5.26 – 5.39 apply to gantries to the extent and by the dates specified in paragraphs 2.5, 2.6 and 2.12.

5.27 The liquid coupler on the loading arm shall be a female coupler which should mate with a 4-inch API (101.6mm) male adapter located in the vehicle.

5.28 The vapour collection coupler on the loading-gantry vapour-collection hose shall be a cam-and-groove female coupler which should mate with a 4-inch (101.6mm) cam-and-groove adapter located on the vehicle.

5.29 The normal liquid-loading rate shall be 2,300 litres per minute (maximum 2,500 litres per minute) per loading arm.

5.30 Where the terminal is operating at peak demand, its loading gantry vapour collection system, including the Vapour Recovery Unit, shall be allowed to generate a maximum counterpressure of 55 millibar on the vehicle side of the vapour collection adapter. (A maximum of 45 millibar at the interface between the adaptor and coupler is likely).

5.31 The loading gantry shall be equipped with an overfill-detection control unit which, when connected to the vehicle, shall provide a fail-safe signal to enable loading, providing no compartment-overfill sensors detect a high level.

5.32 The vehicle shall be connected to the Control unit on the gantry via a 10-pin industry-standard electrical connector. The male connector shall be mounted on the vehicle and the female connector shall be attached to a flying lead connected to the gantry-mounted Control unit.

5.33 The gantry control unit shall be suitable for both 2-wire and 5-wire vehicle systems.

5.34 The vehicle shall be bonded to the gantry via the common return wire of the overfill sensors, which shall be connected to the pin 10 on the male connector via the vehicle chassis. Pin 10 on the female connector shall be connected to the Control Unit enclosure which shall be connected to the gantry earth.

5.35 The design of the liquid-loading and vapour collection facilities on the loading gantry shall be based on the following vehicle-connection envelope.

5.36 The height of the centre line of the liquid adapters shall be:

- Maximum 1.4 metres (unladen); minimum 0.5 metres (laden), the preferred height being 0.7 to 1.0 metres;
- The horizontal spacing of the adapters shall not be less than 0.25 metres (preferred minimum spacing is 0.3 metres);
- All liquid adapters shall be located within an envelope not exceeding 2.5 metres in length;
- The vapour-collection adapter shall be located preferably to the right of the liquid adapters and at a height not exceeding 1.5 metres (unladen) and not less than 0.5 metres (laden).

5.37 The earth / overfill connector must be located to the right of the liquid and vapour collection adapters and at a height not exceeding 1.5 metres (unladen) and not less than 0.5 metres (laden)

5.38 Loading shall not be permitted unless a permissive signal is provided by the combined earth / overfill control unit.

5.39 In the event of an overfill condition or the loss of vehicle earth the Control Unit on the gantry shall close the ganty-loading control valve.

5.40 Loading shall not be permitted unless the vapour-collection hose has been connected to the vehicle and there is a free passage for the displaced vapours to flow from the vehicle into the vapour-collection system.

6. Control Techniques

Summary of the Best Available Techniques

6.1 The following table provides a summary of the best available techniques that can be used to control the process in order to meet the emission limits and provisions in Section 5. Provided that it is demonstrated to the satisfaction of the regulator that an equivalent level of control will be achieved, then other techniques may be used.

Table 3: Summary of Control Techniques

Release Source	Substance	Control Techniques
Petrol storage	Petrol vapours	Minimise breathing losses Good seals Connect to vapour recovery unit (or incinerate or hold vapour)
Loading fixed tanks	Petrol vapours	Connect to vapour recovery unit (or incinerate or hold vapour)
Loading mobile tanks	Petrol vapours	Connect to vapour recovery unit (or incinerate or hold vapour)

Air Quality

Ambient Air Quality Management

6.2 In areas where air quality standards or objectives are being breached or are in serious risk of breach and it is clean from the detailed review and assessment work under Local air Quality Management that the Part B process itself is a significant contributor to the problem, it may be necessary to impose tighter emission limits. If the air quality standard that is in danger of being exceeded is not an EC Directive requirement, then industry is not expected to go beyond BAT to meet it. Decisions should be taken in the context of a local authority's Local air quality Management action plan. For example, where a Part B process is only responsible to a very small extent for an air quality problem, the authority should not unduly penalise the operator of the process by requiring disproportionate emissions reductions. More guidance on this is provided in paragraph 360 of the air Quality Strategy which gives the following advice:

"The approach from local authorities to tackling air quality should be an integrated one, involving all strands of local authority activity which impact in air quality and underpinned by a series of principles in which local authorities should aim to secure improvements in the most cost-effective manner, with regard to local environmental needs while avoiding unnecessary regulation. Their approach should seek an appropriate sources and draw in a combination and interaction of public, private and voluntary effort".

Benzeze – air Quality Objective and EU Limit Value

6.3 The EU has set a limit value for benzene levels in ambient air of 5 mg/m^3 as an annual mean to be achieved by 2010 (Council Directive 2000/69/EC of 16 November 2000 relating to limit values for benzene and carbon monoxide in ambient air).

Air quality objectives for benzene in Wales are the same as those for England which are contained in The Air Quality (England) Regulations 2000 S1928 and in the Air quality (England)(Amendment) Regulations 2002 SI 3043.

- $16mg/m^3$ as a running annual mean to be achieved by 31 December 2003
- $5g/m^3$ as a running annual mean to be achieved by 31 December 2010

Air quality targets for benzene in Scotland are contained in The air Quality (Scotland) Regulations 2000 as amended by the Air Quality (Scotland) amendment Regulations 2002 SSI 2002/297

- 16.25 mg/m^3 as a running annual mean to be achieved by 31 December 2003
- 3.25 mg/m^3 as a running annual mean to be achieved by 31 December 2010

Management

Management Techniques

6.4 Important elements for effective control of emissions include:

- Proper management, supervision and training for process operations;
- Proper use of equipment
- Effective preventative maintenance on all plant and equipment concerned with the control of emissions to the air, and
- It is good practice to ensure that spares and consumables are available at short notice in order to rectify breakdowns rapidly. This is important with respect to arrestment plant and other necessary environmental controls. It is useful to have an audited list of essential items.

- Spares and consumables – in particular, those subject to continual wear – should be held on site, or should be available at short notice from guaranteed local suppliers, so that plant breakdowns can be rectified rapidly.

Appropriate Management Systems

6.5 Effective management is central to environmental performance; It is an important component of BAT and of achieving compliance with permit conditions. It requires a commitment to establishing objectives, setting targets, measuring progress and revising the objectives according to results. This includes managing risks under normal operating conditions and in accidents and emergencies. It is therefore desirable that processes put in place some form of structured environmental management approach, whether by adopting published standards (ISO 14001 or the EU Eco Management and audit Scheme [EMAS]) or by setting up an environmental management system (EMS) tailored to the nature and size of the particular process. Operators may also find that an EMS will help identify business savings.

Regulators should use their discretion, in consultation with individual operators, in agreeing the appropriate level of environmental management. Simple systems which ensure that LAPC considerations are taken account of in the day-to-day running of a process may well suffice, especially for small and medium-sized enterprises. While authorities may wish to encourage wider adoption of EMS, it is outside the legal scope of an LAPC authorisation / LA-PPC permit to require an EMS for purposes other than LAPC/LA-PPC compliance. For further information/advice on EMS refer to EMS Additional Information in Section 8 (PG 1/13 04).

Training

6.6 Staff at all levels need the necessary training and instruction in their duties relating to control of the process and emissions to air. In order to minimise risk of emissions, particular emphasis should be given to control procedures during start-up, shut down and abnormal conditions.

Training may often sensibly be addressed in the EMS referred to above.

- Training of all staff with responsibility for operating the process should include:-
    - Awareness of their responsibilities under the permit
    - Action to minimise emissions during abnormal conditions
- The operator should maintain a statement of training requirements for each operational post and keep a record of the training received by each person whose actions may have an impact on the environment.

These documents should be made available to the regulator on request.

Maintenance

6.7 Effective preventative maintenance should be employed on all aspects of the process including all plant, buildings and the equipment concerned with the control of emissions to air. In particular:

- The regulator should be notified 7 days in advance of any planned maintenance of the vapour recovery unit
- A record of such maintenance should be made available for inspection.