

PERMIT CONDITIONS COMPLIANCE CHECK REPORT

Installation Address:	WTG Treatment Ltd Shed 6, Immingham Dock Immingham North East Lincolnshire DN40 2LZ
Contact:	Mr Scott Anderson
Permit Ref:	EP/201500001
Date of Varied Permit:	New Permit issued 2016
Permitted activity:	Wood Preservation Process A2
Guidance Note:	
Date of Visit:	22.11.18
Report Reference:	
Condition number:	
Records Required records kept and available? Written procedures and training issued to staff? Maintenance programme?	Vesste serviced bi-annually by Koppers. 12/06/18 Daily, weekly and monthly checks completed by staff.
Reporting Emissions monitoring	Compliant
Incident procedure	procedure available in office.
Written Management systems	Compliant.
29 Odour	No odour during visit.
30 Particulate Matter	Compliant. Forklift use gas.
31 Resource utilisation	Review required next year.
32 waste recovery/ avoidance	Compliant
33 – 41 Protection of atmosphere	Compliant

→ Koppers
Induction training
which in place.

POLLUTION PREVENTION & CONTROL

42 - 43 Atmospheric Monitoring Solvent Management Plan	Received copy of Total Emission Limit calculations. Compliant.
Protection of soil and ground water	Compliant Check condition S2 with Scott.
Soil and groundwater monitoring	Discussed.
Additional	Koppers training for drivers to check with site manager.

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 SG Note deadline has yet to be reached	5	
(B) Upgrading not yet complete and SG 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

POLLUTION PREVENTION & CONTROL

* 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	
(B) No such air pollution problems	0	

Total Score for Environmental Impact Appraisal	Range 0 to 70	35
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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?	-5	0	0	N/A 0
(C) Process operation modified where any	0	5	0	N/A 0

POLLUTION PREVENTION & CONTROL

problems indicated by monitoring?				
(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	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	35
REGULATORY EFFORT CATEGORY * high=score of >80, medium 40-80 and low <40	LOW, MED, HIGH	LOW

Officer Signature: *V. Thompson* VICKY THOMPSON.

Operator Signature

Date: 22.11.18.



WTG Treatment

WTG Treatment Ltd
c/o Patrick & Thompsons Ltd
Page Stair Lane
Kings Lynn
PE30 1LQ

FAO Vicky Thompson
Pollution Control
North East Lincolnshire Council
Principal Offices
Town Hall Square
Grimsby
DN31 1HU

19th January 2018

Dear Vicky

Permit reference EP/ 201500001

As required by our permit referenced above, please find our report on VOC / emissions monitoring for calendar year 2016

High Pressure Treatment

Volume of timber treated	4,585m ³
Input of active chemical used	7,612 KG
Retention of chemical in timber	1.66 KG/ m ³

Our emissions for the High Pressure treatment satisfy the Directive requirements as they are below 11KG/m³ of treated timber. ✓

Low pressure Treatment

Volume of timber treated	56,769m ³
Input of active chemical used	101,836 KG
Retention of chemical in timber	1.79 KG/ m ³

 ✓

Our emissions for the Low Pressure treatment satisfy the Directive requirements as they are below 11KG/m³ of treated timber.

I trust this information is sufficient but if you have any further questions, please do not hesitate to contact me.

Yours sincerely

Scott Anderson
Director

For an on behalf of WTG Treatment Ltd

WTG Treatments Ltd

Solvent Emission Management Plan

As required under our permit, we require to have a solvent Management Plan in place to record emissions from our operation.

Our approach follows the requirements of SED Box 6 in that all installations with organic solvent consumption of 25 tonnes or more must meet a total emission limit value / requirement of 11kg/m³ or less.

Compliance with the total emission value per m³ of timber treated is achieved if the total input of the solvent (KGs), Divided by the volume input of wood treated (in M³) is less than or equal to the total emission limit of 11kg /m³.

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$$\frac{\text{Input of solvent (KG)}}{\text{Volume of wood treated}} = \text{emissions in KG/ m}^3$$

The tank operation is controlled by software that tracks (amongst other things) volume treated, and chemical uptakes for each charge. These can be monitored over time and totals applied for a given time period. Our solvent emissions are reviewed on a calendar basis for the purposes of our permit.

In addition the software figures can be double checked by simple calculations of volume throughput, and chemical usage as recorded in other systems (stock records, purchases, and volume of sales)

Each year these input of solvent figures and volume of wood treated will be reported to the council along with the calculated emissions in KG/m³, and appropriate claim of whether it meets the threshold or not.