

PERMIT CONDITIONS COMPLIANCE CHECK REPORT

Installation Address:	Arkema Coatings Resins Ltd Laporte Road Stallingborough Nr Grimsby North East Lincolnshire DN41 8FG
Contact:	James Cribbes
Permit Ref:	Permit Ref. no: EP/20160003
Date of Varied Permit:	New permit issued 29.09.16
Permitted activity:	manufacturing or formulating printing ink or any other coating material containing, or involving the use of, an organic solvent, where the carrying on of the activity is likely to involve the use of 100 or more tonnes of organic solvents in any 12-month period
Guidance Note:	process guidance note 6/44 (11)
Date of Visit:	26/02/19.
Report Reference:	
Condition number:	
1 & 2 Non VOC Limits Table 1 compliance? Correct Ref Conditions?	Continuous Pm compliant + extractive test report received all compliant.
3, 4 & 5 VOC Total Emission Limit Achieved? Solvent Management Plan in accordance with Schedule A	Yes. Received SMP report all satisfactory.
6 – Designated Materials	Records kept for COSH. no designated materials used
Monitoring, Investigating & Reporting 7, 8, 9	Compliant.
10 – Adverse results from monitoring – procedure in place?	Reporting procedure in place. (Impact).
Visible emissions? Odour beyond site boundary? 11, 12, 13 & 14	No odour beyond site boundary.
Silos – maintenance checks and operating conditions in place. Refer to condition 15 - 18	compliant
Abnormal Event procedures? Cond 19 - 22	Reporting procedure. (Impact).
VOC & Odour control –Storage Organic Solvent storage tanks light coloured?	Yes.

POLLUTION PREVENTION & CONTROL

<p>All potentially odorous waste materials shall be stored in suitable closed containers or bulk storage vessels, where appropriate vented to suitable abatement plant.?</p>	<p>Compliant.</p>
<p>27 Fixed liquid storage tanks fitted with high level alarm or volume indicators</p> <p>28 Bulk liquid storage tanks</p> <ul style="list-style-type: none"> - Bund surrounding tank - Capacity 110% 	<p>Yes. Loading procedure and check list signed. High level alarm checked for each load. Calibration of HLA by Vega. 13th/14th Feb 2019.</p> <p>- Yes, staff complete visual checks.</p>
<p>29 Tertiary site perimeter bund Integrity checks?</p>	<p>Yes.</p>
<p>VOC Control Handling</p> <p>30 Raw materials containing VOC shall be stored in closed storage containers.</p> <p>31 Emissions from the emptying of mixing vessels and transfer of materials shall be adequately contained, preferably by the use of closed transfer systems. This may be achieved by the use of closed mobile containers, containers with close-fitting lids, or, preferably, closed containers with pipeline delivery.</p>	<p>Compliant.</p> <p>Compliant.</p>
<p>VOC Cleaning 33 - 36</p>	<p>Compliant.</p>
<p>VOC control waste</p> <p>Prior to disposal, empty drums and containers contaminated with organic solvent shall be closed to minimise emissions from residues during storage prior to disposal</p>	<p>Compliant</p>
<p>Dust & Spillage Control</p> <p>40. Suitable organic solvent containment and spillage equipment shall be readily available in all organic solvent handling areas.</p> <p>41. A high standard of housekeeping shall be maintained</p>	<p>Signage on site for spill procedure. Spill kits available.</p> <p>- o.k.</p>
<p>Training 42 - 43</p>	
<p>44. Written maintenance programme available?</p>	<p>Yes. Staff in house checks and external maintenance programmed.</p>

Needeman complete abatement service + LEV.

Testex complete tank and pipe integrity check

POLLUTION PREVENTION & CONTROL

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	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*	20	12	5
(B) 100 - 250m*	12	10	3
(C) 250 - 500m* Reason Humber Estuary designated a SSSI (370m)	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	
(B) No such air pollution problems	0	0

Total Score for Environmental Impact Appraisal	Range 0 to 70	25
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POLLUTION PREVENTION & CONTROL

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 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

POLLUTION PREVENTION & CONTROL

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 -10 to 105	0
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OVERALL SCORE FOR THE PROCESS	Range -10 to 175	25
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 *J. Crisbes* JAMES CRIBSES

Date: 26/02/19.

