

## PERMIT CONDITIONS COMPLIANCE CHECK REPORT

<b>Installation Address:</b>	Coal Products Ltd Astra Site Western Access Road Immingham Dock North East Lincolnshire DN40 2QR
<b>Contact:</b>	Neil Rowbotham
<b>Permit Ref:</b>	EP/20020007/V6
<b>Date of Varied Permit:</b>	2017 – transfer from Hargreaves
<b>Permitted activity:</b>	Process using coal, coke, coal product and petroleum coke
<b>Guidance Note:</b>	PG3/5 (04)
<b>Date of Visit:</b>	14/05/19
<b>Report Reference:</b>	
<b>Condition number:</b>	
1 No visible emissions or accumulations of particulate matter beyond site boundary?	No visible emissions during visit
2. Operator prevents release of particulate matter?	Yes.
3. Details of any change to wheel wash facility forward to NELC?	Yes received details of change of wheel wash via email June 2018
5 Exhaust emission from mobile plant directed upwards?	—
6 Product loaded to screening equipment sufficiently damp?	Yes
7 Stocking areas maintained in sufficiently damp conditions?	Yes.
8 Wind speed and direction indicator maintained on site?	use weather update system.
9 suitable water supply available onsite?	Yes.
10 All lorries leaving site exit via wheel wash?	Yes.
11 No product worked unless moisture content sufficient to prevent dust emissions?	Compliant.
12 Stockpiles compacted and profiled?	

## POLLUTION PREVENTION & CONTROL

13 Partly worked stockpiles re-contoured to remove ridges and overhanging faces?	
14 Stockpiles temperatures monitored?	- Do not use coals that self heat. Temp probe available.
15	
16 Vehicles arriving with product or leaving with product shall be fully sheeted?	New agreed exit position prior to sheeting to enable movement between CPL and new site (former astra) Condition will need to be amended within permit.
17 vehicles checked for obvious damage to trailer that could result in spillage?	<del>3rd party vehicles</del> . ABP vehicles transport. ABP tool box talk.
18 NELC notified if crusher brought to site?	- not at present.
19 Screening operations cease in high winds?	Yes.
20 Polymer suppression technique used?	- Yes during strong winds.
21 Loading shovel heights kept to a minimum?	
22 vehicle routes checked on continuous basis during normal site operations?	Yes
23 Machinery examined for build up of dusty material weekly?	
24 Malfunction/ escape correction procedure in place and recorded?	Yes.
25 Site log with records of visual assessments and weather forecasts?	Yes.
26 Records kept for 2 years?	Yes.
27 24h cover provided?	Yes
28 Visual assessments recorded daily and pro active alert scale employed?	Daily checks completed. Do not follow alert scale.
29 Sticky guage monitoring undertaken?	Notification.
31 Preventative maintenance programme?	Q4 PPM system.
32 Staff training	Dust management procedure

- send record of wheel wash check

Appendix 2 - CPL Review and propose own system.

# POLLUTION PREVENTION & CONTROL

## Risk Assessment Score Sheet

### Environmental Impact Appraisal

<b>Component 1 - Inherent Environmental Impact Potential</b>		
<b>APRR Risk Rating Category</b>	<b>Possible Scores</b>	<b>Score Awarded</b>
(A) Category 1	10	
(B) Category 2	20	20
(C) Category 3	30	

<b>Component 2 - Progress with Upgrading</b>		
<b>Status of Upgrading</b>	<b>Possible Scores</b>	<b>Score Awarded</b>
(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	

<b>Component 3 - Sensitivity and Proximity of Receptors (circle appropriate score)</b>			
<b>Proximity to Emission Source</b>	<b>Sensitivity of Receptors</b>		
	<b>(x) High</b>	<b>(y) Medium</b>	<b>(z) Low</b>
(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.

<b>Component 4 - Other Targets</b>		
	<b>Possible Scores</b>	<b>Score Awarded</b>
(A) Other air pollution problems in the local area to which process is a potential contributor	10	0
(B) No such air pollution problems	0	

<b>Total Score for Environmental Impact Appraisal</b>	<b>Range 0 to 70</b>	<b>32</b>
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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
<b>Total</b>	<b>(Max. 50)</b>	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	N/A 0
<b>Total score</b>	<b>(-5 to 30)</b>			0

**POLLUTION PREVENTION & CONTROL**

<b>Component 7 - Assessment of Management, Training and Responsibility</b>				
<b>Criterion</b>	<b>Possible Scores</b>			<b>Scores Awarded</b>
	<b>(x) Yes</b>	<b>(y) No</b>	<b>(z) N/A</b>	
(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
<b>Total</b>	<b>(-5 to 25)</b>			0

<b>Total Score for Operator Performance Appraisal</b>	<b>Range -10 to 105</b>	0
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<b>OVERALL SCORE FOR THE PROCESS</b>	<b>Range -10 to 175</b>	32
<b>REGULATORY EFFORT CATEGORY</b> * high=score of >80, medium 40-80 and low <40	<b>LOW, MED, HIGH</b>	LOW

Officer Signature: *V. Thompson* VICKY THOMPSON

Operator Signature *N. Rowbotham* NEIL ROWBOTHAM.

Date: 14/05/19.

