

POLLUTION PREVENTION & CONTROL



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:	23/10/19
Report Reference:	
Condition number:	Copy of permit on site
Records Required records kept and available? Written procedures and training issued to staff? Maintenance programme?	Yes. Signage and procedures on wall. Delivery procedure + spill.
Reporting Emissions monitoring	
Incident procedure	Written procedure on wall for staff.
Written Management systems Maintenance	Keppers complete 6 monthly service on vessels. latest completed on 22/10/19. Daily checks by staff.
29 Odour	No odour
30 Particulate Matter	No particulate emission.
31 Resource utilisation	Discussed review required next year.
32 waste recovery/ avoidance	
33 - 41 Protection of atmosphere	Checked tertiary bund, tank bunding. spill kit and absorbent material.

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SMP provided for 2018 data	Meets Target level.
42 - 43 Atmospheric Monitoring Solvent Management Plan	* need 2017 + 2018 data should be submitted in January - Not compliant
Protection of soil and ground water	Discussed that an assessment of risk management or prevent pollution to groundwater + soil required next year
Soil and groundwater monitoring	→ plan + reporting of groundwater due next year 2020
Additional	→ Need to submit SMP report in January.

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

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* 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

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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	N 5
Total score	(-5 to 30)			5

* forward SMP in January

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

Need to improve management system.

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

Officer Signature: V - Thompson

Operator Signature 

Date: 23/10/19.

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POLLUTION PREVENTION & CONTROL INSPECTION REPORT

