

POLLUTION PREVENTION & CONTROL



PERMIT CONDITIONS COMPLIANCE CHECK REPORT

Installation Address:	Dunlop Oil and Marine Ltd Moody Lane Pyewipe Grimsby DN31 2SP
Contact:	Chris Allen
Permit Ref:	EP/20020004/V1
Date of Varied Permit:	
Permitted activity:	Rubber process
Guidance Note:	6/28(04)
Date of Visit:	17/01/18
Report Reference:	DOM1
Condition number:	
1 Table 4. PM annual extractive 10mg/m3 for bag filtration unit. 50 mg/m3 for Banbury Mixer. Isocyanate 0.1mg/m3 NOx & CO 500mg/m3	Extraction unit – 0.67mg/m3 25.10.17 84"Mill PM extractive test completed 26.10.17. Result 1.2 mg/m3 Isocyanate - 0.003mg/m3 – compliant on 25.10.17 NOx and CO compliant from boiler 2 & 3 test date: 25.10.17
2 Reference Conditions 273.15K, 101.3kPa used?	Yes
3, 4, 5 & 6 VOC Fugitive releases should be reduced by 50% for period of 12 months from 1 April 1992. Determined using solvent management plan.	Solvent Management Plan available? Licensed hazardous waste disposal agents used? Solvent used vs rubber processed? = Target Value = Solvent consumption in 1992/Tonnes of rubber used x 0.5? (Target value 0.68)

To forward final report

Half year point Target Value 0.29.
The full year report not ready yet for
Report Reference: - 2017.

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Solvent Management Plan adhered	Yes
Low or organic solvent coating	
13 SED Box 7	Designated materials used: Substance register record H phases materials. Minimal materials used and replaced as far as possible
14 Monitoring records available?	
15 Regulator informed in advance of annual test?	Yes
16 Visible emission during visit or odour beyond site boundary?	No odour or visible emissions.
17 Silo	Informative
18 Inspection of filtration plant?	Is bag filter or cartridge used? Yes. cartridge for Donaldson and bags for barbury. Are pressure drop sensors used to monitor arrestment plant? Empty bags that have contained carbon black placed in stored containers?
Carbon black storage and empty bags	
20 Abnormal event procedure and records	Compliant.
21 Non-compliance causing immediate danger to human health – procedure in place?	Yes.
LEV Maintenance certificate?	Yes. Compliant. IFS completed checks on flow.
Sampling provisions for extractive testing and compliance Test methods Nitrogen Dioxide ISO 10849? PM ISO 12039?	Yes
32 VOC and Odour control storage	Suitable storage in place and spill procedures
33 Bulk Storage tanks	Compliant
34 Spillage procedure	Compliant
35 VOC Control Handling	handling procedures suitable.
36 Cleaning operations	cleaning procedure in place. Spill kits available.
38 VOC Control Waste	* ongoing work towards storage facility with extraction for draining of residues/drying this.
Training	Compliant
Maintenance Programme	Ducting cleaned by dust busters between 31st July + 4th August. in house system, SAP and external checks on LEV ALLIANCE. Boilers checked by SAAKE.

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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 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* 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.

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	33
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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	○
(B) Incident leading to a justified complaint*	5 per incident	○
(C) Breach of authorisation not leading to formal action (Updated by AQ 18)	10 per breach	○
(D) Incident leading to formal caution, Enforcement Notice or prosecution	15 per incident	○
(E) Incident leading to a Prohibition Notice	20 per incident	○
Total	(Max. 50)	○

* 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 ○
(B) Monitoring requirements reduced because results over time show consistent compliance?	-5	0	0	N/A ○
(C) Process operation modified where any problems indicated by monitoring?	0	5	0	N/A ○
(D) Fully documented and adhered to maintenance programme, in line with authorisation?	0	5	0	Y ○
(E) Full documented records as required in authorisation available on-site?	0	5	0	Y ○
(F) All relevant documents forwarded to the authority by date required?	0	5	0	Y ○
Total score	(-5 to 30)			○-

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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
(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	Y -5
Total	(-5 to 25)			-5

ISO 14001
Certificate
No. 10035845

Total Score for Operator Performance Appraisal	Range -10 to 105	-5
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OVERALL SCORE FOR THE PROCESS	Range -10 to 175	28
REGULATORY EFFORT CATEGORY * high=score of >80, medium 40-80 and low <40	LOW, MED, HIGH	LOW

Officer: VICKY THOMPSON

Officer Signature: *V. Thompson*

Operator Signature

C ALLEN *[Signature]*

Date: 17/01/18

