
LIBERTY STEEL NEWPORT LIMITED

Permit Number:	EPR/EP3830GH
Company:	Liberty Steel Newport Limited
Permit Condition:	4.2.2 (a) A report or reports on the performance of the activities over the previous year shall be submitted to Natural Resources Wales. The report shall include as a minimum: - A review of the results of the monitoring and assessment carried out in accordance with the permit including an interpretive view on data.

Overview

Of the activities provided for within the above permit only the Hot Strip Mill (Activity Ref A1) and its associated Reheating Furnace (Activity Reference A2) were operated during the year 2016. Whilst capacity remains unchanged activity levels have increased to roughly 25% of those anticipated.

The process continues to be operated on an 80 hours/week basis, made up of 4 x 20 hour runs from 8pm to 4pm Monday to Thursday. Employee numbers remain at 153 persons overall.

The permit was the subject of a Variation on 5th February 2016 to provide for the storage of a number of waste types (Activity Reference AR14) and the recycling and reclamation of metals and metal compounds (AR15) To date these activities have been limited to the importing onto site of RDF and this activity has been temporarily suspended since August 16

The main activities likely to have an impact on the environment remain:

i. The Process

The purpose of the process is to convert imported steel slabs into Hot Rolled Coils and Sheets via a 300mt/hr natural gas fired reheat furnace and six stand finishing mill. This remains unchanged albeit being operational only for short periods of the year. Given the predominantly non operational status of the plant during the reporting period, the potential

for the adverse impact on the environment, particularly through the release of fugitive emissions, has been greatly reduced.

Liberty Steel Newport Ltd (LSN) remains committed to monitoring environmental performance by recording a number of Key Performance Indicators and comparing these with previous years. (See Appendix 1) Additionally LSN has, as part of its Environmental Management System, identified certain parameters with a view to targeting reductions of 10% on the previous year (See Appendix 2) Having recovered from a temporary cessation in activities in October 2015 the benefits of comparison against previous year data is limited however it is anticipated that this will continue to be a useful method of benchmarking going forward.

ii. Raw Materials Handling

Raw materials are limited in the main to steel slabs which are imported directly across LSN's private berth on the River Usk. LSN operates the berth in accordance with a Port Facility Waste Management Plan, approved by the Maritime & Coastguard Agency, which provides for each vessel visiting the berth to advise upon wastes likely to be disposed and in turn feedback on the suitability of facilities provided (Appendix 3)

The potential for fugitive emissions arising in this area is limited to activities where mobile plant is utilised. LSN has now procured all mobile plant used on site and has responsibility for all subsequent testing and maintenance. Vehicles continue to be maintained to a state of operational readiness.

LSN is committed to maintaining vehicles in an appropriate condition through regular maintenance and testing. An example of a typical maintenance check sheet is attached (Appendix 4)

iii. Reheat Furnace

Stack monitoring was undertaken at appropriate quarterly intervals as specified within the Environmental Permit these being:

<i>Parameter</i>	<i>Reporting Period</i>	<i>Limit</i>
Oxides of Nitrogen	3 Monthly	400 mg/m ³

LSN can report that the maximum measurements obtained during all quarterly monitoring regimens remain below 250 mg/m³ and within reporting parameters. These results are provided in graphic form (Appendix 5)

For the purposes of performance and benchmarking stack monitoring has been extended to provide for the monitoring of:

<i>Parameter</i>	<i>Reporting Period</i>
Particulate	Annually
Metals:	
Cadmium	Annually
Chrome	Annually
Copper	Annually
Iron	Annually
Lead	Annually
Mercury	Annually
Nickel	Annually
Zinc	Annually
Arsenic	Annually
Manganese	Annually

Having been identified as Key Performance Indicators, the results of this monitoring exercise are then compared to those of the previous year (Appendix 1) and reported to NRW.

iv. Roughing Mill and Finishing Mills

VOC's may be generated as a result of transient hydraulic and lubricating oils lost to process water during scale removal (Activity Reference A11) The main area presenting a risk of oils entering the closed water system is at the 12 back up roll oil seals. A robust maintenance programme is in operation to reduce the risk of seal failure and in turn process water contamination. The effectiveness of such a programme can be measured by sampling scale and measuring oil and grease content on an ongoing basis. An analysis of scale is attached showing oil content (Appendix 6)

Oil is stored in tanks within a series of bunded tanks within the cellars of both the Roughing and Finishing Mills. These areas are subject to monthly inspections where appropriated intervention can be instigated in the event of non compliance.

An example of this monthly inspection is provided (Appendix 7)

v. Cooling Section and Cooling System.

During normal operation all cooling water is retained in two closed water systems each of 60,000m³ which can be operated in separation or in tandem. Losses from these systems are limited to evaporation and depending on seasonal variations can be as high as 5,000m³ per operational day

Recognising the need to use resources in an efficient manner LSN is committed to establishing a reliable source of grey water with previous arrangements being cancelled due to a land ownership dispute. We are pleased to report that we are in the process of concluding arrangements with Dwr Cymru (Nash Water Treatment Works) for a grey water

supply to be re-established directly into the site which will negate fully the need to use towns water in the process. Confirmation of these arrangements has been forwarded to NRW separately

LSN continues to operate a water treatment programme in full compliance with HSG 274 Parts 1 – 3.

vi. Surface Water

LSN is committed to the monthly monitoring of clean uncontaminated surface water run-off for key substances and reporting these results to the enforcing authority on a quarterly basis, these being:

<i>Parameter</i>	<i>Monitoring Frequency</i>	<i>Limit</i>
pH	Monthly	6-10
Suspended Solids	Monthly	20 mg/l
Total Hydrocarbons	Monthly	5 mg/l
Lead	Monthly	0.1 mg/l
Nickel	Monthly	0.1 mg/l
Arsenic	Monthly	0.01 mg/l
Cadmium	Monthly	0.05 mg/l
Chromium	Monthly	0.2mg/l
Copper	Monthly	0.1 mg/l
Zinc	Monthly	0.5 mg/l
Iron Compounds	Monthly	5 mg/l

Throughout the reporting year there have been 6 incidents of minor breaches which in turn were reported to the enforcing authority, these being:

Date	Parameter	Result
21 January	pH	11.5
17 February	pH	11.7
10 March	ph	10.6
13 April	Suspended Solids	51 mg/l
	pH	10.9
17 May	pH	10.9

Reasons for the increase in pH have been linked to large volumes of slag historically stored on site. LSN can report that this has now been removed and no further breaches in reporting limits have been measured for the remainder of the reporting period.

LSN has identified emissions to water as a key performance indicator and in addition to trending these parameters for compliance purposes (Appendix 8) is committed to

monitoring annual discharge levels and comparing these with previous years with a view to ensuring annual limits are improved upon (Appendix 1)

General Waste

The potential for fugitive emissions arising from the storage of wastes on site has increased relatively to the number of personnel on site and the activities being carried out. This is reflected in the report on annual KPI's (Appendix 1)

R STEED

APPENDIX 1

KEY PERFORMANCE INDICATORS 2016

ENVIRONMENTAL PERMIT EPR/EP38330

LIBERTY STEEL NEWPORT LTD

HOT STRIP MILL

(i) Production Tonnage 2016

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total (Tonnes)
Production Tonnage	0.00	10,563.98	10,561.64	19,745.81	14,818.41	16,429.05	3,504.05	3,309.48	4,549.76	6,361.14	17,866	17,227	125,036.06

(ii) Releases to Air

	Emission Rate		Operating hrs		Tonnes		Kg's/Mt of Finished Product	
	kg/hr	Hrs	kg/hr	Hrs	2016	2015	2016	2015
Annual Release Carbon Dioxide	(calculated)				16,459,800		131,640	31,287
Annual Release NOx as NO2	(calculated)	3528	14,379	3528	50,729		0.406	0.009
Annual Release Particulate	(calculated)	3528	0.77	3528	2,717		0.022	0.015

Measured Release mg/m3

	Cd	Cr	Cu	Fe	Pb	Hg	Ni	Zn	As	Mn
Emission Rate g/hour	0.000648	0.011758	0.17212	0.557633	0.076817	0.000309	0.010278	0.125966	0.004099	0.008
kg/annum	0.061	1.108	16,220	52,549	7,239	0.029	0.969	11,871	0.382	0.784
	0.216	3,909	57,224	185,394	25,539	0.103	3,417	41,879	1,346	2,767

Grammes Per Mt of Finished Product 2016

Grammes Per Mt of Finished Product 2015

(iii) Releases to Water

	Susp Solids	Cd	Cr	Cu	Fe	Pb	Hg	Ni	Zn	As	Oil/Grease
Average mg/l 2016	23,2500	0.0008	0.0177	0.0259	0.2375	0.0143	0.0001	0.0050	0.0758	0.0048	0.7080
litres/annum	2628000	2628000	2628000	2628000	2628000	2628000	2628000	2628000	2628000	2628000	2628000
kg/annum	61,101	0.002	0.046	0.068	0.624	0.037	0.000	0.013	0.199	0.013	1,861

Grammes Per Mt of Finished Product 2016

Grammes Per Mt of Finished Product 2015

(iv) Supplied Water

	Tonnes		Kg's/Mt of Finished Product	
Welsh Water	19,602.00		156,771	
Non Potable Water ex United Utilities	(1.00)		0.000	

(v) Non Recoverable Waste*

Waste Type

	Tonnes		Kg's/Mt of Finished Product	
10 02 10 Mill Scale	2,289.86		18,314	
16 02 14 WEF	0.55		0.004	
16 01 03 Tyres	0.00		0.000	
19 08 05 WC Waste	460.35		3,682	
11 01 13 Degreasing wastes	1.71		0.014	
13 02 08 Other engine gear and lube oils	139.95		1.119	
15 02 02 Absorbents etc contaminated with dangerous substances	10.49		0.084	

18 01 04 Wastes whose collection and disposal is not subject to special reqs

20 03 01 Mixed municipal waste

20 10 40 Ferrous Scrap

20 10 40 Non Ferrous Scrap

10 02 02 Slag

10 12 08 Refractory Waste

Total

0.27

247.00

1,023.48

8.03

0.00

64.05

0.002

1.975

8.185

0.004

0.000

0.512

0.000

(i) Production Tonnage 2015/2016

Production Tonnage	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total (Tonnes)
Charged Tonnes 2015	0	0	0	0	0	0	0	0	0	10,349	18,347	28,195	56,890
Charged Tonnes 2016	0.00	10,563.98	10,661.64	19,745.81	14,818.41	16,429.05	3,504.05	3,309.48	4,549.76	6,361.14	17,227	17,866	125,036

(ii) Energy Consumption (kWh)

Electricity	EHV + LV	2015	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total (kWh)
Electricity	EHV + LV	2016	34,101	30,243	14,086	0	0	37,534	98,602	41,104	21,018	29,070	36,548	51,824	394,132
Electricity	EHV + LV	2016	475,570	1,593,345	1,281,244	2,098,327	1,777,347	1,826,109	971,533	772,348	1,170,044	1,073,017	2,152,074	2,183,398	17,374,355

Natural Gas Total KWH 2015	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total (kWh)
Natural Gas Total KWH 2016	0	0	0	0	0	0	0	0	0	6,065,710	6,088,470	8,747,840	20,902,020
	0	8,716,000	6,145,000	11,667,000	9,943,000	10,433,269	3,533,000	3,262,613	4,671,337	4,464,916	13,372,315	11,020,722	87,229,172

2015 Natural Gas

Electricity

2016 Natural Gas

Electricity

(iii) Supplied Water

2015 Welsh Water

Non Potable Water ex United Utilities

2016 Welsh Water

Non Potable Water ex United Utilities

(iii) Oil Usage

2015

2016

(iv) Mill Scale Produced

2015

2016

(v) NOx as NO2

2015

2016

(Calculated)
(Calculated)

Kwh/Mt of Finished Product

367.41

6.93

697.63

138.95

litres/m³ of Finished Product

174.27

0.00

156.77

0.00

litres/m³ of Finished Product

0.16

1.119

kg's/m³ of Finished Product

1.50

0.018

kg's/Mt of Finished Product

0.01

0.406

APPENDIX 3

PORT WASTE MANAGEMENT NOTIFICATION FORM

THIS FORM IS TO BE COMPLETED UNLESS THE SHIP HAS BEEN GRANTED AN EXEMPTION BY THE MARITIME & COASTGUARD AGENCY

Ship information

** denotes compulsory information*

Name of Ship* **"ANMIRO"** IMO Number **9434577**
 Call Sign* **V2DR9** Flag State* **ANTIGUA & BARBUDA**
 ETA* Date **06/12/16** Time: **0800** lt wp ETD* Date **06/12/16** Time **pm** wp agw
 Number of Crew* **7** Terminal/Berth no*
 Last port of call* **Barrow in Furness** Next port of call **Bilbao** Ship's Agent: Address :

HOW MUCH WASTE WILL YOU DELIVER TO PORT RECEPTION FACILITIES?

ALL ☐ SOME ☒ NONEX ☐

If delivering *all* waste, complete **Red** column data fields only. Otherwise, complete all columns, with 'nil' if necessary.

Waste	Amount of waste to be delivered (m ³)	Maximum dedicated storage capacity (m ³)	Amount of waste retained on board (m ³)	Port where remaining waste will be delivered	Estimated amount of waste to be generated before next port of call (m ³)
Oil					
Oil (Old oil)	Nil	8,4	0.72	N/A	0.01
Oily mixtures containing chemicals	N/A	N/A	N/A	N/A	N/A
Sludge from purification of fuel oil	Nil	5,2	0.95	N/A	0.01
Noxious liquids					
Dirty ballast water & tank washings	N/A	N/A	N/A	N/A	N/A
Other (please specify)	N/A	N/A	N/A	N/A	N/A
Sewage					
Untreated sewage	Nil	5.68	0,5	NIL	Nil
Part-treated sewage	N/A	N/A	N/A	N/A	N/A
Garbage					
Food waste	NIL	0.24	0.01	N/A	N/A
Plastic	0.1	0.24	0.01	N/A	N/A
Other (please specify) (Paper, glass)	0.1	0.24	0.01	N/A	N/A

PORT WASTE MANAGEMENT NOTIFICATION FORM

Waste	Amount of waste to be delivered (m ³)	Maximum dedicated storage capacity (m ³)	Amount of waste retained on board (m ³)	Port where remaining waste will be delivered	Estimated amount of waste to be generated before next port of call (m ³)
Cargo-associated waste¹					
Dunnage	Nil	N/A	Nil	Nil	Nil
Other (please specify)	Nil	N/A	Nil	Nil	Nil

Scale & sludge from tank cleaning	Nil	N/A	Nil	Nil	Nil
Other (please specify)	Nil	N/A	Nil	Nil	Nil
¹ May be estimates					

- Notes: 1. This information may be used for Port State Control and other inspection purposes
2. EU Member States will determine which bodies will receive copies of this notification
3. This form is to be completed unless the ship is covered by an exemption in accordance with Article 9 of Directive 2000/59/EC, issued in the UK by the Maritime & Coastguard Agency (MCA)

Do you treat or minimise waste on board?

YES ☐ NO ☒

If the answer is YES, please state what equipment you use (Tick all boxes that apply)

Oily separator ☐ Incinerator ☐ Compactor ☐ Sewage treatment ☐ Recycling facilities ☐ Other (please specify)

STATEMENT

I confirm that the above details are correct and there is sufficient dedicated onboard capacity to store all waste generated between notification and the next port at which waste will be delivered. Date: 06/12/16.....

Time:.....0600...LT.....

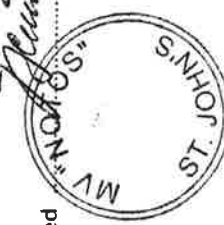
Name: A Svizev.....

Position:MASTER.....

HOW MUCH WASTE WILL YOU DELIVER TO PORT RECEPTION FACILITIES?						
		ALL	SOME	X	NONE	
WASTE	Amount of waste to be delivered (m3)	Maximum dedicated storage capacity (m3)	Amount of waste retained on board (m3)	Port where remaining waste will be delivered	Estimated waste to be generated before next port of call (m3)	
OIL						
Oil	NIL	5.3	0.15			
Oil mixtures containing chemicals						
Sludge from purification of fuel oils	8.5	11.0	0.3	Savona	1.2	
NOXIOUS LIQUIDS						
Dirty ballast water & tank washings						
Other (please specify)						
SEWAGE						
Untreated sewage						
Part-treated sewage						
GARBAGE						
Food waste & packaging	NIL	0.24	0.05	Ceuta	0.06	
International catering waste	NIL	0.72	0.3	Ceuta	0.2	
Separated for recycling						
Other (please specify)						
Plastic	NIL	0.72	0.2	Ceuta	0.15	
CARGO-ASSOCIATED WASTE						
Dunnage						
Other (please specify)						
CARGO RESIDUES						
Scale & sludge from tank cleaning						
Other (please specify)						
Do you treat or minimise waste on board?	YES / NO (IF YES please indicate the equipment you use)	NO				
Oil separator	Incinerator	Compactor	Sewage treatment	Recycling facilities	Other -	

Signed  Master of vessel NOTOS

Date 28/06/2016



LIBERTY

I/WE HEARBY ACKNOWLEDGE THAT THE ABOVE HAS BEEN COMPLETED IN ACCORDANCE WITH OUR INSTRUCTIONS AND AGREE TO THE TERMS AND CONDITIONS

DATE _____



LIBERTY

SERVICE INSPECTION REPORT

INSPECTION		DATE 18-1-17		TRUCK MAKE JCB		
		FLEET No		TRUCK MODEL 125		
		SERVICE		SERIAL No		
HOUR METER 38224	BATTERY S...G	ELECTROLIGHT	OK ☒	LOW	DRY	SERVICE INSPECTION
MAST	☒	SEAT BELTS	☒	GAS UNIT	☒	
CARRIAGE	☒	WHEELS AND NUTS	☒	GAS UNIT	☒	
ROLLERS & CHAINS	☒	TYRES	☒	FUEL PUMP (SYSTEM)	☒	
LIFT CHAINS (ADJ)	☒	BALL JOINTS	☒	RADIATOR CLEAN	☒	
PRIMARY LIFT CHAIN % WEAR	☒	ALL CONTACT TIPS	☒	ENGINE EXHAUST BLACK/BLUE	☒	
SECONDARY LIFT CHAIN % WEAR	☒	CURRENT LIMIT	☒	EXHAUST SYSTEM	☒	
CARRIAGE/BACKREST	☒	MICRO'ADJ	☒	FUEL & FILTERS	☒	
FORKS PASS/FAIL % WEAR	☒	FAIL SAFE	☒	OIL & FILTERS	☒	
HOSE CONDITION	☒	BATTERY COVER CONECTION	☒	AIR FILTER	☒	
HOSE REEL	☒	CHARGER	☒	TRANS.OIL/FILTER	☒	
LIFT CYLINDER	☒	ALL WIRING SERVICABLE	☒	HYD.OIL/FILTER	☒	
TILT CYLINDER	☒	MOTORS SERVICABLE	☒	DIFF OIL	☒	
STEERING PLAY/AXLE	☒	HORN STARTER	☒	ALL PLUGS AND POINTS	☒	
ADJUST BRAKES	☒	FAN BELTS	☒	ALL PLUGS AND POINTS	☒	
CHECK BRAKE PIPES	☒	ALTERNATOR/IGN	☒	OVERHEAD GUARD	☒	
HAND BRAKE	☒	WARNING LIGHTS	☒	CONTROL FUNCTION MARKINGS	☒	
LIGHTING	☒	CHASSIS	☒	PEDAL & LEVER	☒	
PARKING BRAKE	☒	CAPACITY/DATA PLATES	☒		☒	
SEATING PLATFORM	☒	CHARGING SYSTEM	☒		☒	
☒ SERVICABLE		☐ R RENEWED		☐ X UNSERVICABLE		☐ A/L ADJUST & LUBRICATE
DESCRIPTION		QTY	FURTHER WORK REQUIRED/WORK CARRIED OUT AS ADDITIONAL TIME			
HYDRAULIC OIL			HOSE LOST DONE			
GEAR OIL			REAR REVERS LIGHT NETWORKING ✓			
TRANSMISSION OIL			TYRES NEED CUTTING			
SERVICING OILS & GREASE			PIT BOTTLE CLAMPS ✓			
ANTIFREEZE						

I/WE HERBY ACKNOWLEDGE THAT THE ABOVE HAS BEEN COMPLETED

PRINT NAME

SIGNATURE

DATE

D. G. G.

D. G. G.

19-1-17

SERVICE NEEDED.

DOOR TO REPAIR.
WINDOW COVER BROKEN
REAR MIRROR MISSING
BEZON TAKEN OFF.

LIBERTY

[illegible]

PRINT NAME *DO*
SIGNATURE *[Signature]*
DATE *2-17*

Richard Steed

Subject: FW: Mill Scale

From: Grant Hatfield [<mailto:Grant@royhatfield.com>]

Sent: 08 April 2016 16:52

To: Richard Steed

Subject: Mill Scale

Hi Richard,

I have attached the analysis below FYI.

Have a good weekend, speak soon

3418238

Oil	0.49 %
Water	0.97 %
Na	<0.05 %
Mg	0.26 %
Al	0.12 %
Si	0.28 %
P	<0.05 %
K	<0.05 %
Ca	0.05 %
Ti	<0.05 %
Mn	0.73 %
V	<0.05 %
Cr	0.10 %
Fe	69.08 %
Ba	<0.05 %
Zr	0.08 %
Zn	<0.05 %
Sr	<0.05 %

Analysis on 'As Received' Basis

Grant Hatfield
Director

Roy Hatfield Group

Fullerton Road | Rotherham | S60 1DH

Tel: 01709 820855 | **Fax:** 01709 374062

Mob: 07764 464053

Email: Grant@royhatfield.com

Web: www.royhatfield.com



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**OILS AND LIQUIDS STORAGE
CHECKLIST. (A minimum of one
inspection will be undertaken
monthly)**

	Roll Shop		Down Coiler		Electrical Block		Morgoil Area		Rougher Celler		Reheat Furnace		Oil Store		Recycling Area		Waste Oil Sump		Stores Diesel Tank NO		Jetty Diesel Tank NO		Transport Diesel Tank	
	Y	N	Y	N	Y	N	Y	N	Y	N	Y	N	Y	N	Y	N	Y	N	Y	N	Y	N	Y	N
Bunds are of an appropriate design and size for oils and liquids being stored	X		na		X		X		X		X		X		X		X		X					
Bund is in good condition and remains servicable	X		na		X		X		X		X		X		X		X		X					
Bund is free of collected liquids	X		na		X		X		X		X		X		X		n/a		X					
All oil/liquids in the area are stored within the bund	X		na		X		X		X		X		X		X		X		X					
Spillage kit is present and servicable *all spill kits will contain a brush, a shovel and at least two bags of oil absorbents		X		X		X		X		X		X		X		X								
An oily waste disposal barrel and lid is present	X		X		X		X		X		X		X		X		X		X					
The area is free of visible spillages	X		X		X		X		X		X		X		X		X		X					
Oils/liquids within the areas are appropriately labelled	X		X		X		X		X		X		X		X		X		X					
Comments																								

Diesel Tanks by the Stores is in use, on the Jetty and the Transport Diesel Tank not in use and are empty. There are IBCs with Morgoil/ Lubeoil on the road by the stores, Action taken to put those within bunded areas



**OILS AND LIQUIDS STORAGE
CHECKLIST. (A minimum of one
inspection will be undertaken
monthly)**

	Roll Shop		Down Coiler		Electrical Block		Morgoil Area		Rougher Celler		Reheat Furnace		Oil Store		Recycling Area		Waste Oil Sump		Stores Diesel Tank NO		Jetty Diesel Tank NO		Transport Diesel Tank n	
Bunds are of an appropriate design and size for oils and liquids being stored	Y	N	Y	na	Y	N	Y	N	Y	N	Y	N	Y	N	Y	N	Y	N	Y	N	Y	N	Y	N
Bund is in good condition and remains serviceable	X		na		X		X		X		X		X		X		X		X		X		X	
Bund is free of collected liquids	X		na		X		X		X		X		X		X		n/a		X		X		X	
All oil/liquids in the area are stored within the bund	X		na		X		X		X		X		X		X		X		X		X		X	
Spillage kit is present and serviceable *all spill kits will contain a brush, a shovel and at least two bags of oil absorbents	X		X		X		X		X		X		X		X		X		X		X		X	
An oily waste disposal barrel and lid is present	X		X		X		X		X		X		X		X		X		X		X		X	
The area is free of visible spillages	X		X		X		X		X		X		X		X		X		X		X		X	
Oils/liquids within the areas are appropriately labelled	X		X		X		X		X		X		X		X		X		X		X		X	
Comments																								

Diesel Tanks by the Stores, on the Jetty and the Transport Diesel Tank are all empty.