

Temporary vapor recovery system set-up timeline

Date	Headline	Text
08/06/2015	Temporary solution	Mobile and containerised temporary Vapour Recovery Unit delivered to VNT for installation for the period 06/2015 – 09/2015.
21/05/2015	Approaching City Council	Letter to Ventspils City Council informing about intentions to install the temporary Vapour Recovery Unit for the period from June to September 2015 and asking for support.
21/05/2015	Approaching Ventspils Freeport	Letter to Ventspils Freeport Authority informing about intentions to install the temporary Vapour Recovery Unit on jetty 3 from June to September 2015 and the need for the floating crane, operated by the Freeport Authority, for lifting.
26/05/2015	Knocking on Ventspils Regional Environment Board's door. Knock 1	Letter to Ventspils Regional Environment Board informing about intentions to install the temporary Vapour Recovery Unit on the jetty from June to September 2015, asking for support and permission.
03/06/2015	Ventspils Freeport claims readiness to approve	Ventspils Freeport informs that it will approve installation of the temporary Vapour Recovery Unit when VNT receives approvals from Ventbunkers and state institutions, including the State Fire and Rescue Service.
05/06/2015	Road to approval: Station 1 - Fire and Rescue Service	VNT submits a request to the State Fire and Rescue Service to grant approval for installation of the temporary Vapour Recovery Unit.
08/06/2015	Road to approval: Station 2 - Ventbunkers	VNT submits a request to AS Ventbunkers to grant approval for the placement, installation and operation of the temporary Vapour Recovery Unit in its territory.
08/06/2015	Knocking on Ventspils Regional Environment Board's door. Knock 2	Letter to Ventspils Regional Environment Board providing further detailed information about the temporary Vapour Recovery Unit.
08/06/2015	City Council explores	Reply by Ventspils City Council requesting additional information about the temporary Vapour Recovery Unit.
09/06/2015	Road to approval: Fire and Rescue Service clears path	State Fire and Rescue Service agrees to the request of VNT to install the temporary Vapour Recovery Unit.
15/06/2015	Road to approval: Ventbunkers clears path	AS Ventbunkers agrees to installation and operation of the temporary Vapour Recovery Unit by VNT in its territory.
16/06/2015	Knocking on Ventspils Regional Environment Board's door. Knock 3	Letter to Ventspils Regional Environment Board providing answers to additional questions raised.
19/06/2015	Knocking on Ventspils Regional Environment Board's door. Knock 4	Letter to Ventspils Regional Environment Board providing further information requested and asking for an expedited review due to the limited availability of the floating crane.
19/06/2015	Requested approvals received and submitted	VNT submits the approvals received from Ventbunkers and the State Fire and Rescue Service to Ventspils Freeport Authority.
26/06/2015	Explanatory memorandum submitted	After consulting the Architectural and city building department of Ventspils City Council, VNT submits an explanatory memorandum for the conception "Placement of temporary Vapour Recovery Unit at jetty" to Ventspils City Council.
27/06/2015	Installation approved. Commissioning declined.	Ventspils Regional Environment Board informs that placement of the temporary Vapour Recovery Unit onto jetty 3 is permitted, but operation is only allowed after meeting further requirements.
29/06/2015	Reminder to City Council	Letter to Ventspils City Council requesting to expedite approval from the Architectural Planning Department due to the unavailability of the floating crane as of July 2015. Request is based on the assumption that the project belongs to group 1 of building construction requiring the submission of an explanatory memorandum.
30/06/2015	Floating crane deadline	Last day the floating crane is available for use due to the expiry of its certification on 01 July 2015.
01/07/2015	Temporary solution rejected. Building design requested	Letter from Ventspils City Council stating that the project has been assigned to group 2 requiring the submission of a building design in minimum composition. This is despite the earlier consultation that considered the project to be group 1, foreseeing the

		submission of an explanatory memorandum.[TF1]
17/07/2015	Lost opportunity for Ventspils	VNT expresses regret in its letter to Ventspils City Council that no solution was found to employ the temporary Vapour Recovery Unit. The category of the project was changed after the initial consultation. Lifting of equipment could have been allowed before 01 July 2015 while remaining issues were being worked on. LETTER: http://www1.vnt.lv/files/dome_17_07_iz.pdf
02/08/2015	Goodbye, VRU!	Ventspils City Festival – VNT participates and brings the temporary Vapour Recovery Unit to the Festival Parade.
23/02/2016	Approaching the landlord	VNT asks JSC Ventbunkers to approve the placement, installation and operation of the VRU.
25/02/2016	Ventbunkers approval	JSC Ventbunkers approves the request of VNT to place and operate a temporary vapour recovery system (40 foot container) on its territory from 15 May – 30 September 2016.
1/3/2016	Starting 2nd attempt	VNT submits a letter to Ventspils Freeport Authority stating it intends to install and operate the temporary VRU for the period 15 May – 30 September; the same system it intended to use in 2015. LETTER: http://goo.gl/TR2OSK
18/03/2016	Support and approval wanted	VNT informs Ventspils Regional Environment Board about its intention to install and operate the temporary Vapour Recovery Unit for the period 15 May – 30 September 2016 and asks for its approval, providing all supportive information and the view that a permit change is not required due to the nature of the system and its temporary use.
23/03/2016	Approval by Maritime Administration	Letter received from Maritime Administration of Latvia with an approval of the Vapour Recovery Unit project from a maritime safety viewpoint.
29/03/2016	Land lease for placement of 13 metre long container needed	Ventspils Freeport Authority requests VNT to specify the type of land right use related to the land plot on which the temporary vapour recovery system will be placed in the territory of JSC Ventbunkers for 5 months.
29/03/2016	Fire safety approved	State Fire-fighting and Rescue Service approves installation of the temporary Vapour Recovery Unit provided it complies with the binding construction and fire safety regulation.
5/4/2016	Temporary VRU = “significant change” in company operations	Ventspils Regional Environmental Board requests change of Env Cat B permit of VNT even though the employment of the system is temporary and not considered a “significant change” (meaning posing harm to human health and the environment) in its operations. In addition, emission calculations are requested.
6/4/2016	“Use of proposed land plot – lease or not”	VNT emphasises to Ventspils Freeport Authority that it is planning to use the temporary Vapour Recovery Unit on a short term basis (May – September 2016) and receives agreement from JSC Ventbunkers for the placement of the system in its territory. Therefore it considers no need for a separate lease agreement for the land plot on which the unit is placed.
12/4/2016	Emission calculations	VNT submits emission calculations as additionally requested by Ventspils Regional Environment Board.
12/4/2016	Minimum design	On behalf of VNT, LVCT Ltd. submits a building design in minimum composition for the project of the VRU to Ventspils Freeport Authority.
12/4/2016	History catches up	Ventspils Freeport Authority informs that the joint application can only be reviewed once the prosecutor’s office files no objections due to the arrest of shares of JSC Ventbunkers in 2008.
13/04/2016	Meeting and explaining	Meeting between Regional Environment Board and VNT to explore possibilities to employ the system without a permit change as this is a long term process.
21/04/2016	Minimum Design	VNT requests Ventspils Freeport Authority to advise if a building design in minimum composition as submitted by LVCT Ltd. is accepted. VNT informs that it is addressing the subject on receiving a resolution of the prosecutor’s office as to the absence of objections to the installation and operation of the Vapour Recovery Unit.

22/04/2016	No grounds	<p>VNT replies to the arguments of Ventspils Freeport Authority that the land plot for the permanent Vapour Recovery Unit, as stated in the joint application of JSC Ventbunkers and VNT, can only be further progressed upon receiving the relevant statement from the prosecutor's office. VNT states that there are no grounds for the opinion that Ventspils Freeport Authority has no rights to decide upon the lease of the land plot to VNT because:</p> <ol style="list-style-type: none"> 1) The rights of the true beneficiary – Aivars Lembergs, Arnijs Lembergs and Līga Lemberga – are subject to arrest; 2) Shares are arrested, not the assets; 3) Ventspils Freeport Authority has no rights to control the execution of the decision on the arrest of property.
02/05/2016	Is the floating crane certified for use?	<p>While Ventspils Freeport Authority stated the unavailability of its floating crane since summer 2015 due to the absence of its valid technical certificate for use, the same crane has been in service in Ventspils Port in April 2016. As this suggests that the crane actually has all the required permits, VNT requests Ventspils Freeport Authority to confirm its readiness for use. Given the requirements imposed by Ventspils Freeport Authority in connection with the land plot, VNT considers returning back to its original plans to place the Vapour Recovery Unit onto jetty 3, which was impossible last summer due the non-availability of the floating crane with a valid certification for use.</p>
10/05/2016	Decision by the Prosecutor's Office	<p>The criminal court board of Riga Regional Court acknowledges that the arrest of the property refers to the rights of the true beneficiary – Aivars Lembergs, Arnijs Lembergs and Līga Lemberga, and it does not limit the rights and competence of Ventspils Freeport Authority to solve any questions and make any decisions as to the land plot in its possession and leased by JSC Ventbunkers.</p>
13/05/2016	Good news from the Prosecutor's office passed on	<p>VNT forwards a positive reply from the criminal court board of Riga Regional Court as to the absence of any obstacles for Ventspils Freeport Authority to make decisions about the land plots in its possession, and repeatedly asks Ventspils Freeport Authority:</p> <ol style="list-style-type: none"> 1) to allow installation of the VNT temporary Vapour Recovery Unit on the land plot leased by JSC Ventbunkers; 2) to review the joint application of VNT and JSC Ventbunkers on the lease, and give its positive resolution on granting the lease rights to VNT.
16/05/2016	Request for invitation	<p>VNT requests the Board of Ventspils Freeport to review the subject on the lease of the land plot to VNT on an urgent basis, and asks to review the possibility to have a VNT representative present during the meeting on 20 May 2016.</p>
24/05/2016	Freeport board meeting postponed twice	<p>Ventspils Freeport Authority informs about postponing the board meeting from 20 May to 26 May 2016. On the same day it notifies about postponing the board meeting to 27 May 2016. In addition Ventspils Freeport Authority confirms VNT has solved the issue as to AS Ventbunkers granting part of its leased territory in a legal manner.</p>
26/05/2016	VNT confirms participation	<p>VNT submits the list of participants to present VNT's plans for the permanent and temporary VRU at Ventspils Freeport board meeting on 27 May 2016.</p>
26/05/2016	Cancellation of invitation to Freeport Authority board meeting	<p>Ventspils Freeport Authority informs that the board meeting will be gathered for a short time and there is a ground for assumption that VNT's applications as to the temporary and permanent VRU will not be reviewed, therefore presence of VNT representatives is not required.</p>
27/05/2016	Ventspils Freeport Authority changes the board meeting agenda	<p>As there was no certainty whether the subject will be or will not be discussed during the board meeting on 27 May 2016, VNT prepared for its participation and was present at the premises of Ventspils Freeport Authority prior to the start of the meeting. Regrettably VNT was unable to present its VRU plans as this subject matter had been removed from the agenda of the board</p>

		meeting of the Ventspils Freeport Authority on the same day. VNT presentation: http://www1.vnt.lv/files/presentation_ventspils_freeport_27_may_2016_en.pdf
27/05/2016	Proposition of new Freeport regulations behind closed doors	During the board meeting Ventspils Freeport board proposed Ventspils City council to make amendments to the Ventspils binding regulations No 9 “Ventspils Freeport Regulations”, issued on 2 March 2012, without communicating the draft project in prior to the companies affected. Read more: http://www1.vnt.lv/en/aktualitates/news/no-transparency-as-to-development-of-new-ventspils-freeport-regulations/
01/06/2016	Still waiting	VNT reminds Ventspils Freeport Authority that it is still waiting for the response as to being allowed to install the temporary VRU on a land plot occupying 30 m2.
01/06/2016	Minimum design – not confirmed yet	VNT requests Ventspils Freeport Authority to review and confirm the minimum building design submitted for installation and operation of the temporary VRU separately from the unresolved issue of the land plot.
03/06/2016	Confirmation of the initial 2015 plan	As an alternative, VNT asks Ventspils Freeport Authority to re-confirm its 2015 agreement to the placement of the temporary VRU onto berth 33 and confirm availability of the floating crane, which is needed for lifting the equipment onto the berth, operated by Ventspils Freeport Authority.
08/06/2016	Request for access to the faith-turning document	VNT expresses its regret for not being invited to fully participate in the process of drafting the amendments to the Ventspils Freeport regulations, even though for already six months it has been trying to receive answers for its applications to install the temporary and permanent VRU. VNT asks for an opportunity to familiarize itself with the content of the amended Ventspils Freeport regulations and the impact assessment performed on companies operating in the Freeport territory.
09/06/2016	Internal use acceptable, external use unsafe?	Despite the floating crane being in service in the Ventspils Port in April 2016 and the availability of its services is published on Ventspils Freeport Authority’s webpage, Ventspils Freeport Authority re-informs that the floating crane has no valid certificate and is not available for provision of services to external parties.
11/06/2016	Temporary VRU – in the centre of Vides Fakti video plot	Vides fakti video about the VRU goes on air. It shows the temporary VRU located in VNT territory and reflects opinions of VNT experts, Ventspils City Council, and Ventspils Regional Environmental Board. VIDEO: http://www1.vnt.lv/lv/aktualitates/zinas/raidijums-vides-fakti-par-tvaika-savaksana-iekartu-uzstadisanu/
15/06/2016	More details on the map	Ventspils Freeport Authority asks to submit a detailed plan (coordinates) regarding the planned location of the permanent and temporary VRU.
16/06/2016	Approaching senior institutions	VNT requests the Ministry of Transport together with the Ministry of Environmental Protection and Regional Development to review the amended Ventspils Freeport regulations and to reject them on the basis that they have not been developed in a transparent manner. VNT also requests to be given the opportunity to familiarise itself with the content of the proposed amendments.
30/06/2016	Follow us on www.ventspils.lv	Ventspils City Council informed that the draft amendments to Ventspils Freeport Regulations are still under the review and are pending confirmation from the involved institutions, and they will be available on the municipal webpage as soon as the final wording is developed. However no specific deadline is communicated.
01/07/2016	Detailed map	VNT submits the detailed plan (coordinates) regarding the planned location of the permanent and temporary VRU as additionally requested by the Ventspils Freeport Authority.
01/07/2016	Land issue still open	VNT asks Ventspils Freeport Authority when the technical regulations will be issued for the permanent VRU and when the Freeport Board will review the allocation of the land plots required

		for the permanent and temporary VRU.
11/07/2016	Forwarding to responsible party	The Ministry of Transport informs that it will provide its resolution to Ventspils City Council about the prepared amendments to the Ventspils binding regulations No 9 "Ventspils Freeport Regulations" on the basis of resolutions issued by the State Environmental Service and the Maritime Administration of Latvia. Ventspils City Council as the issuer of the regulatory enactment is obliged to ensure the participation of the society in the development of the regulatory enactment.
14/07/2016	Request for markers	VNT receives a letter from Ventspils Freeport Authority dated of 4 July 2016, acknowledging the receipt of the detailed plan (coordinates) for the placement of the temporary and permanent VRU,, but in addition asks to place wooden markers to visualize the area of the planned location.
22/07/2016	Markers will be installed	VNT informs Ventspils Freeport Authority that the wooden markers will be placed by 25 July 2016 and expresses its hope that by doing so it will have provided all necessary information to Ventspils Freeport Authority to fully assess all aspects of the joint application filed by JSC Ventbunkers and VNT during the upcoming board meeting of Ventspils Freeport Authority in August 2016.
27/07/2016	Claimed number of meetings versus actual meeting	Ventspils City Council replies to VNT letter, informing that within the smell reduction programme related to new Freeport Regulations, Ventspils Freeport Authority has organised (5) meetings with port terminal companies (1 meeting with all operators involved and 4 bilateral meetings). While Ventspils City Council insists that VNT did not participate in all meetings, VNT can only confirm participation (2) meetings based on invitation received.
02/08/2016	No date for next board meeting	Ventspils Freeport Authority reiterates to VNT that its applications regarding the VRU project will be reviewed during one of the board meetings of Ventspils Freeport Authority. No date of such meeting is provided despite the importance of the matter to VNT and Ventspils residents.
04/08/2016	Yearly Complex Inspection	State Complex Audit at VNT, during which VNT re-emphasises to state and municipal authorities its intentions to install the VRU and informs about the bureaucratic challenges during the project implementation.
06/08/2016	A city with tomorrow	Second year in a row during the Ventspils City Festival Parade VNT showcases the temporary VRU, which could do better service if allowed to operate with a purpose to raise environmental standards in the city.
24/08/2016	Please specify	VNT believes that the delayed review of VRU matter results in losses of petroleum product cargo for both VNT and Ventspils Freeport. Therefore, VNT asks Ventspils Freeport Authority to specify the date when the VRU matter will be reviewed during the board meeting of Ventspils Freeport Authority.
26/08/2016	A month for checking markers	Ventspils Freeport Authority informs that it inspected the marked potential location of VRU on 27 July (almost a month ago). In addition, it notifies about the commencement of works to define the condition of construction elements of hydraulic construction slopes.
21/09/2016	Public dialogue	Ventspils City Council has sent a letter to various stakeholders in the political and economic sphere and published the same, claiming that VNT is making incorrect statements about the VRU installation process and the actions performed by Ventspils City Council and Ventspils Freeport Authority.
18/10/2016	Public dialogue – VNT comments Attachement: http://www1.vnt.lv/files/4_10_vnt_vestule.pdf	VNT issues comments in reply to the letter of Ventspils City Council of 21 September 2016.

