


Summary sheet

Permit Number: BK3638IF	Compliance Officer: Julia Frost, James McClymont	
Operator: Hydro Aluminium Deeside Ltd	Auditor (if different):	
Emission Point(s):	Others Present: Joel Priest, Sue Bairstow, Boris Kurth	
OMA Sections	SCORE	
OMA 1 – Management of monitoring	100%	
OMA 2 – Periodic monitoring and test laboratories	95%	
OMA 3 – Continuous monitoring	94%	
OMA 4 – Quality assurance	100%	
	OVERALL SCORE	97%
OVERALL SITE ASSESSMENT COMMENTS	Letter	
	Variation	
	Enforcement	
	Date of audit:22/08/17	
		
	Signed:	
	Date: 11/09/17	

OMA 1: Management of monitoring		
OMA ELEMENTS	SCORE	COMMENTS
A. Documentation of management system procedures for monitoring	5	Comprehensive monitoring procedures within the site's EMS. Procedures available to all staff
B. Organisational structure for monitoring	5	Clearly defined roles. Sufficient resources in place
C. Schedules and planning of monitoring, including contingencies	5	Permit diary SSP prior to each visit Calibration CEM on SAP – 6 monthly. Link to current certificate on spreadsheet
D. Monitoring records and use of monitoring data	5	Internal triggers on CEMS – 3 and 4.75. Data downloaded and reviewed monthly.
E. Understanding the requirements of the permit and monitoring methods	5	QSHE Manager demonstrated a comprehensive understanding of monitoring requirements
OMA 1 – SCORE	25/25	
SUMMARY COMMENTS FOR OMA 1		
Trending as part of annual reporting system.		

OMA 2: Periodic monitoring and test laboratories		
OMA ELEMENTS	SCORE	COMMENTS
A. Sampling provisions <i>Critical Element</i>	3	The sampling platforms for emission points A1 and A12 are not compliance with TGN M1 – the platforms are not wide enough to allow a full traverse of the stack.
B. Certification of equipment	5	ESG currently carry out the periodic monitoring – MCerts number 1015
C. Measurement methods and standards <i>Critical element</i>	5	All monitoring methods used are inline with the permit
D. Calibration methods <i>Critical element</i>	5	Sampling and analytical methods calibrated – checks carried out by Hydro during every monitoring exercise
E. Frequency of maintenance and calibration	5	Checked by QSHE Mgr whilst monitoring carried out – photos taken and report written
F. Reliability of equipment (data availability)	5	No reliability issues. Emission data provided as required
G. Breakdown response	5	EQS have spare equipment and can bring alternative to site if necessary
H. Traceability	5	UKAS / MCerts accredited lab
OMA 2 – SCORE	38/40	
SUMMARY COMMENTS FOR OMA 2		
<p>Platforms A1 and A12 are not compliant with TGN M1, monitoring reports highlight this issue. The Operator has previously demonstrated, via an investigation by ESG in 2013, that the results obtained using the current platform are representative and therefore are deemed satisfactory.</p> <p>The Operator proposes to replace the bag plant and will ensure that the sample points on the new plant are compliant with TGN M1.</p>		

OMA 3: Continuous monitoring		
OMA ELEMENTS	SCORE	COMMENTS
A. Provisions for monitoring and location of CEMs <i>Critical Element</i>	5	CEMS located fine.
B. Certification of CEMs	5	MCerts monitors used
C. Calibration methods <i>Critical element</i>	5	Certificates provided per stack. Annually calibrated.
D. Frequency of maintenance and calibration	5	Calibrated and serviced annually. Maintained 6 monthly via internal SAP
E. Reliability of equipment (data availability)	5	Continuous data going back several years
F. Breakdown response	3	No official agreement. Contractor relatively localy. Generally respond within 48 hours.
G. Traceability	5	3 samples taken per calibration and compared to spot sample results. Maintenance and calibration records maintained.
OMA 3 – SCORE	33/35	
SUMMARY COMMENTS FOR OMA 3		
<p>The most recent spot samples taken for calibration purposes have found that the CEM was reading significantly higher than the spot sample. This has been found to be an issue with sites where the concentration of particulates emitted is low (as is the case here) and NRW are currently looking further into this. Once a solution has been agreed this will be forwarded to the relevant Operators.</p>		

OMA 4: Quality assurance		
OMA ELEMENTS	SCORE	COMMENTS
A. External quality control schemes	5	All UKAS MCerts accredited
B. Internal data quality control	5	CEMs data reviewed at least monthly. Annual report produced comparing previous years performance and performance with other sites. QHSE Mgr reviews sample reports on receipt
C. Competence of monitoring personnel	5	ESG are MCerts accredited. Staff at last monitoring exercise - 2 level 2, 1 level 1
D. Auditing of monitoring	5	Internal audit plan covers auditing of monitoring contractors. Documented
E. Audit compliance	5	No issues highlighted with current Monitoring Contractor
F. Reporting	5	All reports recd in timescales
OMA 4 – SCORE	30/30	
SUMMARY COMMENTS FOR OMA 4		