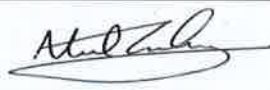


OMA Report – Emissions to Air – EPR

Summary sheet		
Permit Number: BU2322IF	Compliance Officer: Aled Zachary	
Operator: Dynea UK Ltd	Auditor (if different):	
Emission Point(s): A18	Others Present: Greg Hickman (HSE Officer)	
OMA Sections		SCORE
OMA 1 – Management of monitoring		72%
OMA 2 – Periodic monitoring and test laboratories		100%
OMA 3 – Continuous monitoring		N/A
OMA 4 – Quality assurance		73%
OVERALL SCORE		82%
OVERALL SITE ASSESSMENT COMMENTS		Letter
		Variation
		Enforcement
Dynea are able to demonstrate an acceptable standard of monitoring for the aerial emissions from site. Although annual monitoring is carried out as required there is no specific plan to ensure it is scheduled each year (this being the responsibility of the HSE Officer). It is recommended that a specific monitoring plan is developed in light of this. The sampling standards and methods are robust with accredited contractors and laboratories being used for the analysis. Monthly spot checks using in situ monitors are also conducted by staff, primary to monitor plant performance but also provide extra assurance that the emissions are within the permitted limits. An audit of the monitoring contractors was planned for last year but was not completed; it is recommended this is carried out this financial year to verify contractor procedures and monitoring methods.		
		Date of audit: 20/03/13
		Signed: 
		Date: 26/04/13

OMA 1: Management of monitoring		
OMA ELEMENTS	SCORE	COMMENTS
A. Documentation of management system procedures for monitoring	3	Operating procedure details monitoring requirements but no specific plan for stack emission monitoring.
B. Organisational structure for monitoring	3	Monitoring is responsibility of defined personnel but not document in detail.
C. Schedules and planning of monitoring, including contingencies	2	Monitoring is carried out as required but no schedule / plan for its arrangement.
D. Monitoring records and use of monitoring data	5	Monitoring data is interpreted in the monthly HSE report to look for trends. Results are used to help track plant performance.
E. Understanding the requirements of the permit and monitoring methods	5	HSE Officer has a thorough understanding of permit responsibilities.
OMA 1 – SCORE	18/25	72%
SUMMARY COMMENTS FOR OMA 1		
A. Dynea operates the site with accredited management systems. Standard operating procedure 109 details emissions monitoring requirements, although there is no specific stack emission monitoring plan available. B. Technical and Safety Manager (Paul De Wolf) has overall responsibility for compliance with PPC permit. HSE Officer (Greg Hickman) is responsible for monitoring aspects. The quality control manager will deputise in his absence and the plant manager has some understanding of monitoring requirements. Annual stack emissions monitoring are contracted to a 3rd party with last year's monitoring carried out by ESG. C. Annual monitoring is carried out as required but there is no specific schedule. Outlook system is used to prompt arrangement. Site specific protocol provided by monitoring contractor. D. The monitoring report produced by ESG or other contractors is sent to the HSE officer and Technical & Safety Manager. Monitoring is carried out over a 48hr period and any breaches are reported. Monthly ad-hoc monitoring is also carried out of the emissions using personal monitoring pumps with capture tubes and the results are reviewed at HSE meetings to track plant performance. E. HSE Officer has arranged EPR compliance training for staff in July / August 2013. Dynea prefer to operate as an "intelligent buyer" when organising monitoring by external contractors and therefore have knowledge of M2 and other monitoring guidance.		

OMA Report – Emissions to Air – EPR

OMA 2: Periodic monitoring and test laboratories		
OMA ELEMENTS	SCORE	COMMENTS
A. Sampling provisions <i>Critical Element</i>	5	Permanent sampling platform that is compliant with M1 guidance.
B. Certification of equipment	5	MCERTS accredited contractor.
C. Measurement methods and standards <i>Critical element</i>	5	Sampling method is compliant with BS EN 13649, MCERTS accredited contractor.
D. Calibration methods <i>Critical element</i>	5	MCERTS accredited contractor. UKAS / MCERTS calibration for in-house test equipment.
E. Frequency of maintenance and calibration	5	MCERTS accredited contractor and UKAS 1015 accredited lab.
F. Reliability of methods and equipment (data availability)	5	Sampling method has a reliability of 95-97%
G. Breakdown response	N/A	N/A
H. Traceability	5	UKAS 1015 accredited lab for analysis.
OMA 2 – SCORE	35/35	100%
SUMMARY COMMENTS FOR OMA 2		
A. The sampling ports on the emissions stack comply with M1 guidance for gaseous emissions; a permanent access platform is also in place to facilitate monitoring. B. Periodic monitoring is carried out by an accredited 3rd party contractor. C. The current monitoring techniques employed are specific to the determinands of interest with high reliability and low LOD. D. UKAS / MCERTS certified labs and contractors used for the last round of annual monitoring. E. UKAS / MCERTS certified labs and contractors used for the last round of annual monitoring. IN house equipment is also calibrated to these standards on a 6 month basis.		

OMA Report – Emissions to Air – EPR

F. Equipment used for monitoring is highly reliable with a 95-97% reliability rating. Low limits of detection for all determinants of interest.

G. N/A

H. Labs used for sample analysis are UKAS accredited indicating a full traceability to national standards.

OMA Report – Emissions to Air – EPR

OMA 3: Continuous monitoring		
OMA ELEMENTS	SCORE	COMMENTS
A. Provisions for monitoring and location of CEMs <i>Critical Element</i>	N/A	
B. Certification of CEMs	N/A	
C. Calibration methods <i>Critical element</i>	N/A	
D. Frequency of maintenance and calibration	N/A	
E. Reliability of methods and equipment (data availability)	N/A	
F. Breakdown response	N/A	
G. Traceability	N/A	
OMA 3 – SCORE	N/A	
SUMMARY COMMENTS FOR OMA 3		
Only applicable to CEMS.		

OMA Report – Emissions to Air – EPR

OMA 4: Quality assurance		
OMA ELEMENTS	SCORE	COMMENTS
A. External quality control schemes	4	MCERTS accredited sampling contractor and UKAS accredited lab. Operator's management system is certified.
B. Internal data quality control	4	Internal monitoring is tracked monthly to look for trends.
C. Competence of monitoring personnel	5	MCERTS accredited sampling contractor.
D. Auditing of monitoring	3	Procedure for internal auditing of monitoring has been developed.
E. Audit compliance	2	Audit of monitoring contractors planned but not carried out, scheduled for this year.
F. Reporting	4	Contents of the monitoring report meet the permit requirements and reporting frequencies.
OMA 4 – SCORE	22/30	73%
SUMMARY COMMENTS FOR OMA 4		
A. Last year's method statement and a SSP provided by the monitoring contractor (ESG) were reviewed during the audit and conform to the relevant requirements. Dynea's management systems are accredited and monitoring is within their scope. B. External monitoring is verified verses monthly in-house monitoring of stack emissions. C. Monitoring personnel are qualified under MCERTS. Training records to demonstrate this were not inspected during the audit. D. A procedure has been developed for the auditing of 3rd party monitoring contractors as part of ISO 9001 requirements. The audit plan for each year is created and managed by the Quality Control Manger (Gavin Ding). E. An audit of emissions monitoring was planned for 2012 but not actually carried out. This has been flagged and an internal non-conformance by the QC Manager. As a result an audit of the emissions monitoring will be carried out this year (most likely in May). F. Reporting is in line with permit requirements and in the format specified.		