

OMA Report – Emissions to Air – EPR

Summary sheet

Permit Number: UP3831ES	Compliance Officer: Siân McGregor-Andrew	
Operator: TS Resins	Auditor (if different): Siân McGregor-Andrew & Ian Oakes	
Emission Point(s): A18	Others Present: Donna Jones, Greg Hickman, Jayme Mountford	
OMA Sections		SCORE
OMA 1 – Management of monitoring		84%
OMA 2 – Periodic monitoring and test laboratories		100%
OMA 3 – Continuous monitoring		n/a
OMA 4 – Quality assurance		83%
OVERALL SCORE		89%
OVERALL SITE ASSESSMENT COMMENTS		Letter
		Variation
		Enforcement
The operator is able to demonstrate a high level of compliance with the required standards for monitoring emissions to air and periodic monitoring techniques are as specified by the permit. It is recommended that the contractor audits are incorporated into a schedule in a way that ensures they are carried out at the recommended frequency, this would increase the score under OMA4, although the overall scores for the site are of a high standard.		
		Date of audit: 21/02/2019
		Signed: 
		Date: 21/03/2019

OMA 1: Management of monitoring		
OMA ELEMENTS	SCORE	COMMENTS
A. Documentation of management system procedures for monitoring	4	Documented management system and monitoring procedures, appropriately controlled and issued to relevant staff.
B. Organisational structure for monitoring	4	Organogram identifies roles and named individuals and management system details roles and responsibilities in relation to monitoring and identifies deputies.
C. Schedules and planning of monitoring, including contingencies	3	Monitoring frequency identified in SOP and scheduled as per permit requirements. SSP provided by contractor.
D. Monitoring records and use of monitoring data	5	SOP procedure for review of reports and results are discussed in monthly HSE meetings to monitor trends and general plant performance.
E. Understanding the requirements of the permit and monitoring methods	5	Key staff demonstrate a thorough understanding of the permit and monitoring requirements.
OMA 1 – SCORE	21/25	84%
SUMMARY COMMENTS FOR OMA 1		
TS Resin's site management systems are accredited to ISO9001, ISO14001 and ISO18001 and are audited internally and externally on an annual basis. Procedures are available to all relevant staff. The general company organogram has named individuals in key roles. Roles and responsibilities in relation to monitoring and reporting are set out within the management system with details of deputies to ensure sufficient cover is provided. Monitoring frequencies are identified within the SOPs for annual MCERTS and routine internal stack emissions monitoring, and a schedule is in place that ensures the requirements of the permit are met. MS Outlook calendar prompts ensure monitoring is carried out. The SOP for MCERTS monitoring requires submission of SSP prior to testing. MCERTS monitoring SOP contains procedure for review of reports and results are discussed in monthly HSE meetings to monitor trends and general plant performance. Annual audits of all monitoring requirements against the permit are carried out with outcomes recorded and actions identified. EMS auditing for both Synthite and TS Resins are being combined into a single schedule. Key personnel demonstrated a thorough awareness of the permit and the requirements for monitoring and reporting.		

OMA 2: Periodic monitoring and test laboratories		
OMA ELEMENTS	SCORE	COMMENTS
A. Sampling provisions <i>Critical Element</i>	5	Permanent sampling platform and sampling ports comply with M1 guidance requirements
B. Certification of equipment	5	MCERTS accredited contractor used
C. Measurement methods and standards <i>Critical element</i>	5	MCERTS accredited contractor used. Monitoring methods comply with US EPA M316 and CEN/TS 13649.
D. Calibration methods <i>Critical element</i>	5	MCERTS accredited contractor and MCERTS/UKAS ISO17025 laboratories accredited for the relevant determinands.
E. Frequency of maintenance and calibration	5	MCERTS accredited contractor and UKAS ISO17025 laboratories used.
F. Reliability of equipment (data availability)	5	No issues with repeat analysis or rescheduling of samples due to equipment failure.
G. Breakdown response	5	Monitoring equipment supplied by MCERTS accredited contractor who would supply replacement equipment.
H. Traceability	5	ISO17025 laboratories undertaking analysis are UKAS/ MCERTS accredited.
OMA 2 – SCORE	40/40	100%
SUMMARY COMMENTS FOR OMA 2		
The fixed stack access platform was reviewed by the MCERTS accredited contractor against the requirements of TGN M1 during the latest monitoring exercise and confirmed as being compliant. An external MCERTS accredited contractor is used for periodic monitoring who supply all equipment. Accreditation details supplied in the latest monitoring report from Exova Catalyst. SSP is in place and TS Resin's procedures require that it is reviewed prior to monitoring taking place on site. The ISO17025 laboratories employed by the contractor are MCERTS/ UKAS accredited for the relevant determinands of interest.		

OMA 3: Continuous monitoring		
OMA ELEMENTS	SCORE	COMMENTS
A. Provisions for monitoring and location of CEMs <i>Critical Element</i>		
B. Certification of CEMs		
C. Calibration methods <i>Critical element</i>		
D. Frequency of maintenance and calibration		
E. Reliability of equipment (data availability)		
F. Breakdown response		
G. Traceability		
OMA 3 – SCORE	N/A	
SUMMARY COMMENTS FOR OMA 3		
Not applicable		

OMA 4: Quality assurance		
OMA ELEMENTS	SCORE	COMMENTS
A. External quality control schemes	5	ISO14001 accredited EMS covering monitoring provisions. MCERTS monitoring contractor and UKAS accredited ISO17025 laboratory used.
B. Internal data quality control	4	Monitoring data reports are reviewed when received from the MCERTS accredited contractor. Monitoring results are discussed at monthly meetings to track plant performance.
C. Competence of monitoring personnel	5	3 rd party monitoring contractor, personnel accredited to Level 1 and Level 2 MCERTS
D. Auditing of monitoring	4	Periodic auditing of the MCERTS contractor carried out. Annual audit against permit requirements. Internal and external ISO14001 EMS audits.
E. Audit compliance	2	Audits of the MCERTS contractor are intended to be carried out on a 5-yearly cycle. Previous report was from May 2013. Next audit planned for May 2019.
F. Reporting	5	Reporting is prompt and meets permit requirements.
OMA 4 – SCORE	25/30	83%
SUMMARY COMMENTS FOR OMA 4		
MCERTS accredited monitoring contractor and UKAS accredited ISO17025 laboratory used. TS Resin's ISO14001 accredited EMS includes monitoring procedures and is audited both internally and externally. Monitoring data reports are reviewed when received from the MCERTS accredited contractor. Monitoring results are discussed at monthly meetings to track plant performance. A procedure for auditing of the MCERTS contractor is in place and is carried out by the QA Manager, normally every 5 years. The last audit record available was from 2013 the next audit is planned for May 2019. Recommendation: Schedule and monitor the contractor auditing to ensure it is carried out at the recommended frequency. MCERTS monitoring SOP contains procedure for review of reports and results are discussed in monthly HSE meetings to monitor trends and general plant performance. Annual audits of all monitoring requirements against the permit are carried out with outcomes recorded and actions identified.		

Acknowledgements: Content based on Environment Agency Operator Monitoring Assessment Version 4, January 2013 Reporting Template, Emissions to Air - used with permission.

Further Information: More Guidance regarding Operator Monitoring Assessment (V4) can be found at the following GOV.UK webpages (Environment Agency Guidance Notes):

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/301267/Preparation_for_an_OMA_audit.pdf
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/301257/Industrial_installations_regulated_under_the_EP_R_-_emissions_to_air.pdf