OMA Report – Emissions to Air – EPR

Summary sheet		
Permit Number: BU2394IL	Compliance Officer: Siân McGregor-Andrew	
Operator: Synthite Ltd	Auditor (if different): Siân McGregor-Andrew & Ian Oakes	
Emission Point(s):	Others Present: Donna Jones, Greg Hickman, Jayme Mountford	
OMA Sections		SCORE
OMA 1 – Management of monitoring		84%
OMA 2 – Periodic monitoring and test laboratories		68%
OMA 3 – Continuous monitoring		n/a
OMA 4 – Quality assurance		83%
	OVERALL SCORE	80%
OVERALL SITE ASSESSMENT COMMENTS	Letter / Variation / Enforcement	

The operator is able to demonstrate a good level of compliance with the required standards for monitoring emissions to air and periodic monitoring techniques are as specified by the permit. Provisions for auditing and reporting of monitoring data achieved a high score.

Although equipment and laboratory provision are not MCERTS certified the Environmental Chemist's MCERTS Level 2 accreditation and level of knowledge is appropriate to the type of monitoring being undertaken.

Recommendations of the previous OMA Air audit in 2009 have been incorporated into the management system and procedures for monitoring.

Actions identified under OMA 2:
1. Provide additional informaiton demonstrating that the method of sampling from the top of the A18 stack is equivalent to monitoring at the sampling ports and that the results obtained using the two methods are comparable. Confirm whether results obtained since the change in method vary significantly to those seen previously.
2. A review of the suitability and safety of the access to A12 and A18 was recommended due to changes to A18 access since its construction (as above) and due to the need for monitoring personnel to climb over or through abutting railings to access A12.

The type and frequency of monitoring of emissions to air being undertaken is to be reviewed alongside the current LVOC Bref permit review process. Any proposal to reduce monitoring frequency would need to be supported by evidence of the stability of the process and associated emission levels and will require a permit variation. Consideration could also be given to utilising an external MCERTS accredited monitoring service in place of in-house monitoring which would increase the scores within OMA section 2.

Date of audit: 21/02/2019
Signed: S McGregor-Andrew
Date: 21/03/2019

OMA 1: Management of monitoring		
OMA ELEMENTS	**SCORE**	**COMMENTS**
A. Documentation of management system procedures for monitoring	5	Comprehensive 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	4	Monitoring frequencies identified and scheduled as per permit requriements. Electronic calendar prompts ensure planned monitoring is completed. Formal annual review of all monitoring.
D. Monitoring records and use of monitoring data	4	Monitoring data is entered onto a master spreadsheet and assessed against ELVs and internal trigger limits for escalation.
E. Understanding the requirements of the permit and monitoring methods	4	Environmental Chemist has MCERTS level 2 accreditation, key personnel demonstrated a good awareness of permit requirements.
OMA 1 – SCORE	21/25	84%

SUMMARY COMMENTS FOR OMA 1

Quality Management System accredited to ISO9001 and Environmental Management System accredited to ISO14001 audited internally and externally on an annual basis. Procedures are held both in paper form (master copy and lab copy) and on the intranet to be 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 and a schedule is in place that ensures the requirements of the permit are met. MS Outlook calendar prompts ensure monitoring is carried out. Environmental Chemist is available for rescheduling failed or lost samples. Suitably qualified 3rd party contractors (as utilised by TS Resins on site) could be used in the event of unplanned absence.

Results entered onto a colour-coded spreadsheet which highlights when results are close to or exceeding the ELVs to prompt escalation procedures. Permit limits are displayed on the recording forms. All results are emailed to technical management group for review and discussion during regular review meetings. Annual audits of all monitoring requirements against the permit are carried out (viewed 2010 to present) with outcomes recorded and actions identified. EMS auditing schedule for both Synthite and TS Resins are being combined into a single schedule.

Environmental Chemist has MCERTS level 2 accreditation, key personnel demonstrated a good 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 *Critical Element*	3	Sampling platforms reviewed against M1 requirements. Temporary scaffolds and scafftags inspected prior to use.
B. Certification of equipment	3	In-house laboratory lab equipment not certified due to methods specified in permit.
C. Measurement methods and standards *Critical element*	3	Methods comply with permit requirements. Key staff member has MCERTS Level 2 accreditation. Methods are reviewed annually.
D. Calibration methods *Critical element*	3	PID is calibrated by 3rd party service. In-house calibration methods recorded, sample standards are traceable to national standards.
E. Frequency of maintenance and calibration	3	Service contracts for annual certification and calibration. Schedule and calendar prompts ensure required frequencies are met.
F. Reliability of equipment (data availability)	4	No issues requiring repeat sampling or analysis, reliability is >95%
G. Breakdown response	3	No contracted service in place. Sufficient spares and duplicate equipment held on site for quarterly monitoring period.
H. Traceability	5	Reference materials traceable to national standards. Weights and balances annually certified. Daily calibrations
OMA 2 – SCORE	27/40	68%

SUMMARY COMMENTS FOR OMA 2

Fixed stack access platforms reviewed by the operator against the requirements of TGN M1 when sampling ports were installed and are inspected prior to each monitoring exercise. The aerial emissions section of the Environmental Procedures Manual details inspections and risk assessments to be underetaken prior to all monitoring activities.

Modifications to the gantry at emission point A18 mean the existing sampling ports are no longer used due to H&S considerations. A steel probe used to sample from the top of the stack has been assessed by the operator as being consistent with the standard monitoring method. A preliminary velocity traverse has been carried out to determine that flow stability criteria is met as per TGN M1.

Action: Provide evidence demonstrating that the method of sampling from the top of the stack is equivalent to monitoring at the sampling ports and that the results obtained using the two methods are comparable. Have results obtained since the chage in method varied significantly to those seen previously?

Action: A review of the suitability and safety of the access to A12 and A18 was recommended due to changes to A18 access since its construction (as above) and due to the need for monitoring personnel to climb over or through abutting railings to access A12. (continued..)

OMA2 comments continued..
Monitoring methods meet the requriements of the permit, laboratory equipment is not MCERTS certified due to the methods used, the Environmental Chemist undertaking monitoring is MCERTS Level 2 accredited. Methods are reviewed annually. Calibration standards used are traceable to national standards. Calibration records are kept. Testing tubes expiry date checks are part of the testing procedures.

No issues with equipment reliability. Sufficent spares held on site given the quarterly monitoring period. Duplicate lab equipment also availale for analysis in the event of a breakdown. Budget for replacements available to allow purchase of required items within the monitoring periods.

OMA 3: Continuous monitoring		
OMA ELEMENTS	**SCORE**	**COMMENTS**
A. Provisions for monitoring and location of CEMs *Critical Element*		
B. Certification of CEMs		
C. Calibration methods *Critical element*		
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	3	ISO14001 accredited EMS covering monitoring provisions
B. Internal data quality control	3	Data is informally reviewed during analysis and recording.
C. Competence of monitoring personnel	4	Environmental chemist is accredited to MCERTS Level 2.
D. Auditing of monitoring	5	Annual audit against permit requirements. Internal and external ISO14001 EMS audits.
E. Audit compliance	5	Audits are carried out in line with a schedule and non-conformances are tracked, reports are circulated internally
F. Reporting	5	Reporting is prompt and meets permit requirements.
OMA 4 – SCORE	25/30	83%

SUMMARY COMMENTS FOR OMA 4

ISO14001 accredited EMS includes monitoring procedures and is audited both internally and externally. Comment on previous OMA report in relation to lack of plant status requirements prior to monitoring being undertaken has been addressed, this is now included within the montioring procedures.

Monitoring data is reviewed by the Environmental Chemist who is MCERTS Level 2 accredited, results recording system has automated flags for results at, or approaching the permit limits and results are escalated to management group for review.

Audit schedule in place which flags complete/ incomplete audits. Non-conformance system in place to track and record issues. Internal audit reports are circulated and audits are discussed as regular agenda items. Audits cover methods, monitoring points and calibrations.

Monitoring reports meet permit requirements and are normally submitted on time electronically and in paper format.

Acknowledgements: Content based on Environment Agency Operator Moniotoring 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_EPR_-_emissions_to_air.pdf