OMA Report – Discharges to Water – EPR

Summary sheet	
Permit Number: BU2349IL	Compliance Officer: Siân McGregor-Andrew
Operator: Synthite Ltd	Auditor (if different): Siân McGregor-Andrew & Ian Oakes
Discharge point(s): S1/ W1	Others Present: Donna Jones, Greg Hickman, Jayme Mountford

OMA Sections		SCORE
OMA 1 – Management of monitoring		84%
OMA 2 – Periodic monitoring and test laboratories		83%
OMA 3 – Continuous monitoring		98%
OMA 4 – Quality assurance		87%
	OVERALL SCORE	88%

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 water. Provisions for management, 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.

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

Date of audit: 21/02/2019
Signed: SC McGregor-Andrew
Date: 15/03/2019

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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 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 results are checked against permit ELVs and emiled out to a management group for review. No trend analysis.
E. Understanding the requirements of the permit and monitoring methods	4	Key staff demonstrate a thorough understanding of permit and monitoring 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.

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.

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*	5	Sampling facilities comply with the requirements of M18 guidance
B. Certification of equipment	N/A	
C. Measurement methods and standards *Critical Element*	4	Methods comply with requirements specified in the permit, documents available to relevant saff and are reviewed annually.
D. Calibration methods *Critical element*	3	In-house lab is not MCERTS or UKAS accredited. Methods documented in lab manual. Annual audits include calibration methods.
E. Frequency of maintenance and calibration	3	Schedule for maintenance and calibration within lab manual, records of completion held in lab.
F. Reliability of equipment (data availability)	5	No issues with repeat sampling or analysis due to equipment failures, reliability is >95%
G. Breakdown response	4	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	29/35	83%

SUMMARY COMMENTS FOR OMA 2

Sampling points W1 and S1 are both easy to access safely and are located as stated in the permit. Samples are collected and analysed in the in-house laboratory for all determinands required, using the specified methods.

Laboratory staff have up to date training records for the methods used. Documented methods are reviewed at least annually and any updates to the methods or procedures are cascaded by the QC function leader. Annual audit covers emission points, methods and calibration checks.

Daily calibrations carried out by the night shift staff, some calibrations e.g. pH are carried out on both shifts. Record of calibrations available in the lab. Annual calibration and UKAS certification for weights and balances is carried out by a contracted service, renewal of this contract was in progress at the time of the audit. Calibration reference materials purchased are traceable to national standards.

No maintenance contract is in place. Sufficient spares are held on site, including duplicate analytical equipment, and budget for purchase of new equipment is available if required.

Results verified against DCWW's own testing for S1 and in-house quality control manual covers calibration and standards, and includes a schedule for laboratory equipment maintenance and servicing. MS Outlook calendar prompt are also utilised to ensure scheduled work is completed.

OMA 3: Continuous monitoring		
OMA ELEMENTS	**SCORE**	**COMMENTS**
A. Provisions for monitoring and location of CWMs *Critical element*	5	Flow monitoring facilities comply with guidance requirements.
B. Certification of CWMs	5	MCERTS conformity certificate for flow monitoring at W1 and S1 valid to October 2019.
C. Measurement methods and standards *Critical element*	5	MCERTS conformity certificate for flow monitoring at W1 and S1 valid to October 2019.
D. Calibration methods *Critical element*	5	Flow meters calibrated using ultrasonic meter that is traceable to national standards for volumetric and mass flow monitoring.
E. Frequency of maintenance and calibration	5	Frequency of maintenance and calibration is appropriate. Schedule and calendar prompts ensure required frequencies are met.
F. Reliability of equipment (data availability)	5	No issues with lost monitoring due to equipment failures.
G. Breakdown response	4	No maintenance contracts in place however spares are held on site and budget for replacement of monitoring equipment is available if required.
H. Traceability	5	Ultrasonic meter is traceable to national standards.
OMA 3 – SCORE	39/40	98%

SUMMARY COMMENTS FOR OMA 3

MCERTS conformity certificate for flow monitoring at W1 and S1 valid to October 2019.

The Reliability Engineer is trained to use a clamp-on ultrasonic flow meter unit which is traceable to national standards and is hired by the site to check all flow monitoring across the site. The unit is used for both volumetric and mass flow monitoring.

Acceptance criteria for flow meter agreement with the ultrasonic meter is stated within the site water manual as >92%. S1 agreement is 97% and W1 agreement is 94% at last assessment 15/02/2018.

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	4	Internal quality control procedures. Data is reviewed during analysis and recording against internal action limits and permit requirements
C. Competence of monitoring personnel	4	Comprehensive training records available for laboratory staff for training against monitoring methods. Reviewed annually or when changes are made.
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	26/30	87%

SUMMARY COMMENTS FOR OMA 4

ISO14001 and ISO9001 accredited EMS includes monitoring procedures and is audited both internally and externally.

Monitoring results recording system has automated flags for results at, or approaching the permit limits and results are escalated to management group for review. Lab staff are trained on escalation procedures. No inter-lab proficiency schemes followed but internal quality control procedures form part of the EMS, which is audited.

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 monitoring and analytical methods, monitoring points and calibrations.

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