

## Summary sheet

Permit Number: BU7545IM	Compliance Officer: Siân McGregor-Andrew
Operator: Sherwin Williams/ Valspar	Auditor (if different):
Emission Point(s):A1,2,3,6, 37,38	Others Present: Candice Aliasgar-Sankoomar (SHE Manager)

OMA Sections	SCORE
OMA 1 – Management of monitoring	22/25
OMA 2 – Periodic monitoring and test laboratories	33/40
OMA 3 – Continuous monitoring	n/a
OMA 4 – Quality assurance	23/30
	<b>OVERALL SCORE</b> 82%

### OVERALL SITE ASSESSMENT COMMENTS

The operator is able to demonstrate a good understanding by key staff of the permit requirements in relation to monitoring emissions to air. Compliance with the required standards for monitoring emissions to air and periodic monitoring techniques are satisfactory however clarification is required with regards to the justification for some method deviations. Provisions for management of monitoring (through the site EMS and systems) and the auditing and reporting of monitoring data achieved good scores.

An MCerts accredited monitoring contractor is utilised. MCerts awareness training would be of great benefit for auditing of monitoring activities and critical review of key reports they provide. There is also a need to review the monitoring locations against M1 guidance to identify feasible improvements to allow better manoeuvrability of monitoring equipment and ensure adequate access to all sampling ports.

Recommendations of the previous OMA Air audit in 2015 have been partly incorporated with recent improvements to some monitoring ports. At the time of the audit improvements to signage were awaiting completion.

#### Actions:

Element 2A – Review monitoring locations against M1 requirements as highlighted in the monitoring contractors reports and identify feasible improvements in a report by 20/12/2019

Element 2C – Identify the reasons for and remedial action required to address the issue of monitoring points A1 and A5 not meeting the EN15259 requirements (differential pressure <5pa) during the last monitoring round by 20/12/2019

Element 2D - Confirm why the June 2019 VOC results were reported as not MCerts analysis by 8/11/19

Date of audit: 15/08/2019

Signed: Siân McGregor-Andrew

Date: 10/10/2019

<b>OMA 1: Management of monitoring</b>		
<b>OMA ELEMENTS</b>	<b>SCORE</b>	<b>COMMENTS</b>
A. Documentation of management system procedures for monitoring	5	ISO14001 management system in place. Monitoring procedures appropriately controlled and issued to relevant staff. SSP is provided prior to monitoring by MCERTS contractor.
B. Organisational structure for monitoring	4	Management system details roles and responsibilities in relation to monitoring. Action tracking system includes scheduling requirements for monitoring, deputies and escalation of incomplete monitoring and reporting activity.
C. Schedules and planning of monitoring, including contingencies	5	Monitoring frequencies identified and scheduled as per permit requirements. Action tracking system and contractor scheduling ensure planned monitoring is completed. Monitoring contract reviewed annually.
D. Monitoring records and use of monitoring data	4	Monitoring data is entered onto a spreadsheet and assessed against ELVs and operating conditions at time of monitoring. Annual emissions performance reviews are reported globally and quarterly under the EMS.
E. Understanding the requirements of the permit and monitoring methods	4	SHE manager demonstrated a good awareness of permit requirements. Monitoring procedures specifies MCERTS contractors. Appropriate training matrix in place for SHE manager and other relevant staff including contractors.
<b>OMA 1 – SCORE</b>	22/25	88%
<b>SUMMARY COMMENTS FOR OMA 1</b>		
<p>EMS is 14001:2015 accredited and monitoring of emissions to air falls within its scope. Relevant procedures for managing and reviewing monitoring are held on the site's intranet system which is accessible to relevant staff. EMS Section 4.5.1 covers monitoring, measurement &amp; analysis, DEE_PRO_015 Monitoring &amp; Measurement procedures stipulates MCERTS requirements and associated forms or procedures are cascaded by managers to the relevant staff. Only document owners can edit these and the Qualtrax system records all amendments and versions.</p> <p>Contracted MCERTS monitoring provider's contract is rearranged annually on the basis of permit requirements and provision of an SSP and scheduling of quarterly monitoring rounds is agreed.</p> <p>Responsibility for all 14001 EMS compliance activities is allocated to the SHE manager in the site environment manual, who is also the document owner for all monitoring procedures. The MIRA system action tracking notifies both the SHE manager and a deputy when monitoring actions are due, and escalates overdue actions to senior management. Monitoring is also manually tracked by the SHE manager.</p>		

Results are discussed in daily meetings and abnormal results investigated with relevant plant operators.

Appropriate training matrix in place for SHE manager and other appropriate staff including contractors covering EPR and permit awareness and environmental compliance which is regularly refreshed. New staff induction also includes permit awareness.

**Recommendation:** SHE manager and other staff responsible for monitoring would benefit from regular MCERTS awareness training to enhance the critical review of SSPs, monitoring reports and contractor monitoring activities.

<b>OMA 2: Periodic monitoring and test laboratories</b>		
<b>OMA ELEMENTS</b>	<b>SCORE</b>	<b>COMMENTS</b>
A. Sampling provisions <i>Critical Element</i>	3	M1 guidance requirements not fully met at all monitoring points, however sampling ports have been recently improved. Point A3 has been moved to ground level. Access to points is generally safe.
B. Certification of equipment	4	MCERTS accredited contractor is utilised to undertake required periodic monitoring
C. Measurement methods and standards <i>Critical element</i>	3	Monitoring contractor has MCERTS Level 2 accreditation and ISO17025 laboratory is utilised. Some deviations in method partly due to access issues which are identified in reports and should be addressed, or requirement for ATEX rated equipment.
D. Calibration methods <i>Critical element</i>	3	MCERTS accredited contractor is utilised to undertake required periodic monitoring, however VOC analysis results are reported as not MCerts accredited.
E. Frequency of maintenance and calibration	5	MCERTS accredited contractor is utilised to undertake required periodic monitoring
F. Reliability of equipment (data availability)	5	No issues requiring repeat sampling or analysis, reliability is >95%.
G. Breakdown response	5	MCERTS accredited contractor is utilised to undertake required periodic monitoring, sufficient time between quarterly monitoring to re-organise in the event the contractor is unable to provide equipment. MIRA system flags due/ overdue monitoring.
H. Traceability	5	MCERTS accredited contractor is utilised to undertake required periodic monitoring
<b>OMA 2 – SCORE</b>	33/40	83%
<b>SUMMARY COMMENTS FOR OMA 2</b>		
<p>A – Element MCERTS reports indicate some points were not fully compliant with M1 guidance at last monitoring. New ports have recently been installed on multiple monitoring points – all require new labelling. Sampling ports were sealed and appeared in good condition, ladders or steps used to access monitoring points have ladder tags, some were without safety chains as previously identified. Space surrounding some ports was limited, but was the best available position to safely sample and did not prevent MCERTS contractor from undertaking monitoring. Access to point A6 in June 2019 is not allow for both sample lines (rectangular duct) to be monitored.</p>		

**Action:** Deviations from M1 requirements are identified within the monitoring reports and should be investigated and addressed where possible prior to the next monitoring round. It would be advisable to use the checklist in Annex 1 of the M1 guidance note to review each monitoring point. Provide a report on required improvements.

B – MCerts contractor Element undertake monitoring. Latest reports provide valid certification details. Some deviations in equipment used due to ATEX rating requirements. Where intrinsically safe alternatives are used/ required these should be recorded in the SSP or monitoring procedures.

C - Methods are generally as stated in the permit, except for particulates as the permit refers to a method no longer supported within the M2 guidance, however the method used during monitoring is listed in M2 and is appropriate. Operator to ensure a regular review of methods in M2 to ensure valid methods are utilised.

**Action:** monitoring points A1 and A5 did not meet the M1 and EN15259 requirements (differential pressure <5pa) during the last monitoring round and this should be investigated further as previous reports have not identified this as an issue. Please review at the next monitoring round.

D - MCerts accredited monitoring contractor and laboratory utilised. VOC analysis is listed in the monitoring reports as non-MCERTS, despite the use of accredited monitoring contractors and laboratory.

**Action:** Please review this with the service provider and confirm the reason why this is the case.

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		
<b>OMA 3 – SCORE</b>	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. Some sampling and analysis is not reported as MCerts complaint, however the monitoring contractor and laboratory are accredited.
B. Internal data quality control	4	Data is informally reviewed during quarterly reporting
C. Competence of monitoring personnel	4	MCerts accredited monitoring contractor and ISO17025 accredited laboratory used, however not all results are reported as MCerts compliant (See element 2D).
D. Auditing of monitoring	4	Annual internal audits against permit requirements for ISO14001 critical procedures and external EMS audits.
E. Audit compliance	4	Audits are carried out in line with a schedule and non-conformances are tracked, reports are circulated internally
F. Reporting	4	Reporting is normally prompt and generally meets permit requirements.
<b>OMA 4 – SCORE</b>	23/30	77%

### SUMMARY COMMENTS FOR OMA 4

A – As discussed in element 2D above the monitoring reports for June 2019 state that the VOC analysis is not MCerts analysis and the reasons for this should be identified and addressed where possible.

B – SHE manager reviews the monitoring reports to produce the quarterly permit submissions. Results are entered onto an XL spreadsheet which contains the permit ELVs to track and trend compliance.

**Recommendation:** MCerts awareness training would assist in the critical review and validation of monitoring reports

C – See element 2D, **Action:** Clarification required as to the accreditation of VOC results.

D – Monitoring and Measurement procedure (DEE-PRO-15) was audited in 2018. MCerts monitoring contractor was audited in 2019. No formal procedure for auditing monitoring reports received. Auditors have external (SGS) and internal training which is recorded on training tracker. Small number of trained auditors are utilised however it is not always possible for staff to be independent of the department/ procedure being audited.

E - Corrective actions are captured within the MIRA system and are allocated and tracked, with overdue action flagged to senior management automatically.

**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/301267/Preparation_for_an_OMA_audit.pdf)

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