OMA Report – Discharges to Water – EPR

Summary sheet			
Permit Number: BT4885IT	Compliance Officer: Matthew Kelk		
Operator:	Auditor (if different):		
Discharge point(s):	Others Present: Sian McGregor Andrew		
OMA Sections			SCORE
OMA 1 – Management of monitoring			100%
OMA 2 – Periodic monitoring and test laboratories			88%
OMA 3 – Continuous monitoring			95%
OMA 4 – Quality assurance			70%
		OVERALL SCORE	88%
OVERALL SITE ASSESSMENT COMMENTS			Letter
			Variation
			Enforcement

OMA focussed on emissions to water from emission point W1.

A score of 88% was achieved during the audit. The monitoring of emissions to water is generally well controlled. There were several areas of improvement that are detailed in OMA 2C and 4B.

Date of audit: 17 September 2018
Signed: 
Date: 08 November 2018

OMA 1: Management of monitoring		
OMA ELEMENTS	**SCORE**	**COMMENTS**
A. Documentation of management system procedures for monitoring	5	Integrated EMS procedure QPROC0069/RCID300210 showing what samples should be taken and at what times. Identifies responsibilities for documents and record keeping.
B. Organisational structure for monitoring	5	Clearly defined management structure shown with organogram during the audit. Provision for deputy if general manager not available. Site contact set up to deal with monitoring issues.
C. Schedules and planning of monitoring, including contingencies	5	Detailed sampling schedule for aspects of sampling accompanied with methodology.
D. Monitoring records and use of monitoring data	5	Operators are competent to look at monitoring data. GMES System with results flags up any warning or if near to ELV's. Daily management meeting will discuss anything that was out of specification. Monthly EMS meeting includes report on quality of effluent. This published as part of EMAS.
E. Understanding the requirements of the permit and monitoring methods	5	Hydrological MCERTS training has been carried out by key members of staff.
OMA 1 – SCORE	25/25	
SUMMARY COMMENTS FOR OMA 1		

OMA 2: Periodic monitoring and test laboratories		
OMA ELEMENTS	**SCORE**	**COMMENTS**
A. Sampling provisions *Critical Element*	4	Sample location meet requirements of Environment Agency TGN M18 for sampling facility and autosampler. Some storage details are detailed in sampling method attached to the sampling schedule.
B. Certification of equipment	4	Buhler 4010 autosampler – MCERTS certificate available. pH meter – standard meter, not MCERTS certified.
C. Measurement methods and standards *Critical Element*	2	See below
D. Calibration methods *Critical element*	5	In house sampling equipment and analytical equipment calibrated to a high standard. Calibration is linked to maintenance management system.
E. Frequency of maintenance and calibration	5	Frequency of calibration is linked to maintenance management system. Certificates shown for calibration balances and pH meters used in house.
F. Reliability of equipment (data availability)	5	Reliable equipment – rare repeat analysis. Autosampler linked to SCADA system.
G. Breakdown response	5	Multiples spare available on site for Spectrophotometer, pH meters and balances. Service agreement for autosamplers, spares available.
H. Traceability	5	Off site lab used is fully UKAS/MCERTS accredited. In house methods used are traceable, certificates of calibrations provided during audit.
OMA 2 – SCORE	35/40	

SUMMARY COMMENTS FOR OMA 2
OMA 2C – Total nitrogen and total phosphorus and Metals are tested externally by Exova – MCERTS certificate shown for determinants tested externally. Results for COD and Suspended solids are sent to Exova labs every 6 months for a results

comparison.
Test methods used in house at UPM are listed in TGN M18 e.g. Blue Book or alternative method. There appears to be no internal review process.
Action – UPM needs to create an auditable documented EMS procedure to review analytical methods and standards periodically against the requirements of the permit and guidance note TGN M18.

OMA 3: Continuous monitoring		
OMA ELEMENTS	**SCORE**	**COMMENTS**
A. Provisions for monitoring and location of CWMs *Critical element*	5	Flowmeter and autosampler checked during site walkover. Both pieces of kit fully meet the requirements of TGN M18.
B. Certification of CWMs	4	Flowmeter full MCERTS certification, SIRA report produced during audit (8/11/2017). Not MCERTS for pH and temperature.
C. Measurement methods and standards *Critical element*	4	Flow meter full MCERTS and pH and temperature high standard equivalent that comply with TGN M18. There are MCERTS checks for flow meter.
D. Calibration methods *Critical element*	5	CWM's calibrated to a high standard. Calibration certificates shown for flow meter, there are also alternative methods that can be used to check the flowmeter is working correctly e.g. charting water coming into the installation versus volume leaving site. pH and temperature probes calibrated to a high standard, certificates and maintenance schedules audited.
E. Frequency of maintenance and calibration	5	Frequency of maintenance and calibration is suitable for all CWM's. Covered by PPM schedule and MCERTS checks for flow meter scheduled in on a service contract.
F. Reliability of equipment (data availability)	5	Very rare breakdown of equipment, valid results for over 98% of the time.
G. Breakdown response	5	General spares available for pH and temperature. Flow meter would require larger maintenance task due to its size, but inherent safety pumps will ensure daily limit is not exceeded.
H. Traceability	5	Traceable to appropriate standards.
OMA 3 – SCORE	38/40	

SUMMARY COMMENTS FOR OMA 3

OMA 4: Quality assurance		
OMA ELEMENTS	**SCORE**	**COMMENTS**
A. External quality control schemes	3	External labs used are UKAS accredited for determinants sent to Exova. Suspended solids and COD samples are sent for results comparison on a six monthly basis to Exova.
B. Internal data quality control	1	No internal data quality control procedures exist. It is recommended that these EMS procedures are compiled for this purpose.
C. Competence of monitoring personnel	5	Fully trained staff, some MCERTS trained. SOP training and MCERTS certificates provided.
D. Auditing of monitoring	3	There is an internal EMS auditing schedule and checks are carried out against procedures by senior managers. Although this is not specific to monitoring.
E. Audit compliance	4	Audit non compliances are discussed with personal and day supervisor. SOP is updated if needed.
F. Reporting	5	Monitoring reports meet high standards and requirements of the permit and are submitted by permitted deadlines.
OMA 4 – SCORE	21/30	
SUMMARY COMMENTS FOR OMA 4		