


OMA Report – Discharges to Water – EPR

Summary sheet		
Permit Number: BJ9703IM	Compliance Officer: Paul Challender	
Operator: Kimberley Clark	Auditor (if different): N/A	
Discharge point(s): W2	Others Present: N/A	
OMA Sections	SCORE	
OMA 1 – Management of monitoring	92%	
OMA 2 – Periodic monitoring and test laboratories	83%	
OMA 3 – Continuous monitoring	100%	
OMA 4 – Quality assurance	80%	
	OVERALL SCORE	89%
OVERALL SITE ASSESSMENT COMMENTS	Letter	
	Variation	
	Enforcement	
<p>Overall score of 89% reflects the competent management of monitoring of emissions to water, with all critical elements being met. The reduction in the score from the last OMA is primarily related to the pandemic affecting the ability to obtain a full suite of emission parameters to the required standards.</p> <p>OMA 1C and 2C highlighted that there was a minor improvement required to the management system in the 2017 OMA assessment. This recent OMA identifies that the action has not been carried out despite PR-25815 being reviewed and re-dated to a 2022 version. The tables in Environmental Monitoring Management Procedure PR-25815 should be updated to reflect the new wording of the permit variation issued in 2016 as table references, footnotes, determinand definitions (e.g metals, priority hazardous substances) and some limits (e.g flow) have changed.</p>		
	Date of audit: 04/04/22	
	Signed: 	
	Date:	

OMA 1: Management of monitoring		
OMA ELEMENTS	SCORE	COMMENTS
A. Documentation of management system procedures for monitoring	5	ISO14001:2015 certified EMS contains an Environmental Monitoring Management Procedure (PR-25815).
B. Organisational structure for monitoring	5	Defined roles and responsibilities with nominated deputy role for monitoring defined within PR-25815.
C. Schedules and planning of monitoring, including contingencies	3	Schedule for water emissions monitoring is defined in PR-25815.
D. Monitoring records and use of monitoring data	5	Documented procedures for review and auditing of contractor's reports are evident and subject to document control and review.
E. Understanding the requirements of the permit and monitoring methods	5	Evidenced training to provide relevant understanding is present.
OMA 1 – SCORE	23/25 92%	
SUMMARY COMMENTS FOR OMA 1		
<p>The operator has operated under an ISO14001:2015 certification since 2017 and has continued to operate under this system exercising relevant document control and review. The Environmental Monitoring Management procedure (PR-25815) is included within the EMS. It sets out monitoring requirements and standards for permit compliance and defining responsibility for scheduling, monitoring, testing, and auditing of contractors and post campaign data reviews. The site has a document management system that records variations to all EMS documentation. Staff have access to EMS documentation electronically.</p> <p>PR-25815 defines management of monitoring and maintenance responsibilities within each shift to provide adequate resource for these roles. Nominated deputising roles are also identified. Each role has defined tasks which are implemented through Standard Operating Procedures. PR-25815 identifies the site's organogram which resides in a standalone document and identifies positions against staff names.</p> <p>Water discharge monitoring schedules, methods and standards for permit compliance are listed in PR-25815. SOPs for spot sampling and programming of the MCERTS autosampler are issued to relevant lab and shift staff. Daily worksheets and control charts for collating sample details and in-house analysis results are checked for each shift by the senior lab technician, discussed at daily meetings and are reviewed frequently by senior management. Contingency measures are in place for samples lost/ damaged by the courier. All analysis results are trended and reviewed for process control of the effluent treatment plant, including metrics beyond those required for permit compliance.</p> <p>Relevant staff have received logged internal training relating to the monitoring requirements of the EPR permit.</p> <p>OMA1C: The table in PR-25815 needs updating to reflect the new permit version issued in March 2016 as the table references, footnotes and some limits have changed (notably the flow limits). A further review of these tables will be required in September 2018 as AOx monitoring increases to bi-monthly and annual limits apply for a range of determinands.</p>		

This error was highlighted in the 2017 OMA to Water. The most recent version of PR-25815 (Rev 4, effective date 20th January 2022) was submitted for this OMA assessment which still includes this error. This should be rectified as a priority and will generate a CCS score as discussed in the associated CAR form.

OMA 2: Periodic monitoring and test laboratories		
OMA ELEMENTS	SCORE	COMMENTS
A. Sampling provisions	5	MCERTS certified autosampler used for flow-proportional sampling of final effluent.
B. Certification of equipment	N/A	Not assessed
C. Measurement methods and standards	2	Periodic monitoring impacted by Covid and schedule not updated.
D. Calibration methods	4	External lab issues due to Covid. Internal calibration carried out in accordance with written procedures
E. Frequency of maintenance and calibration	5	Internal and external maintenance and calibration recorded at appropriate intervals.
F. Reliability of equipment (data availability)	5	Equipment is at least 95% reliable
G. Breakdown response	4	E&H have next-day call-out service. Lab equipment spares kept on site, with back-up machines
H. Traceability	4	External lab issues due to Covid.
OMA 2 – SCORE	29/35 83%	
SUMMARY COMMENTS FOR OMA 2		
<p>Procedures including SOPS and work instructions are in place to control periodic sampling, maintenance, and recertification of equipment. Periodic sampling results are generated and reported to NRW according to relevant reporting timescales.</p> <p>The operator has experienced issues obtaining an applicable sampling regime for periodic samples. The reason for this is primarily the change in working practices of their designated, correctly accredited provider for laboratory services due to the Covid pandemic. This is further compounded due to the tidal restriction placed upon the operator in the permit to conduct monitoring during discharge on the ebb tide of the Dee estuary. Obtaining a correctly accredited provider to fit these restrictions has proven difficult but the operator has worked to secure improved sampling arrangements as they have become available. This has given rise to a generally improving picture regarding periodic sampling and the operators endeavours are appreciated. This issue has been discussed and attracted CCS scores in CAR forms throughout the pandemic and as such will not attract any further scores as a result of this audit.</p> <p>OMA2C: Please refer to OMA1C comments above.</p>		

OMA 3: Continuous monitoring		
OMA ELEMENTS	SCORE	COMMENTS
A. Provisions for monitoring and location of continuous monitors	5	Flow monitoring in accordance with MCERTS.
B. Certification continuous monitors	5	Flow monitoring in accordance with MCERTS. The autosampler and transmission software is MCERTS certified.
C. Measurement methods and standards	5	Methods are appropriate for permit requirements. Formal review processs would be instigated if methods were changed.
D. Calibration methods	5	External MCERTS calibration provision.
E. Frequency of maintenance and calibration	5	Frequency appropriate.
F. Reliability of methods (data availability)	5	No known reliability issues.
G. Breakdown response	5	Next day call out service.
H. Traceability	5	MCERTS accredited flow meter and data transmission calibration.
OMA 3 – SCORE	40/40 100%	
SUMMARY COMMENTS FOR OMA 3		
<p>NB: CEMS for pH and temperature not assessed in this OMA. Only continuous flow measurement assessed.</p> <p>The INST65 planned maintenance procedure controls the maintence, testing and calibration of the flow meter which, is carried out by E&H engineers under MCERTS.</p>		

OMA 4: Quality assurance		
OMA ELEMENTS	SCORE	COMMENTS
A. External quality control schemes	3	External lab changes due to the pandemic.
B. Internal data QC	N/A	Not assessed
C. Competence of monitoring personnel	3	External provider services impacted by the pandemic. In-house staff training requirements specified for each role, individual training records maintained, and SOPs signed off for analytical methods.
D. Auditing of monitoring	5	EMS has ISO14001:2015 accreditation. Internal audits are carried out annually.
E. Audit compliance	5	EMS14001 accredited site management system. Internal audits carried out by qualified staff
F. Reporting	4	Monitoring results reported to the regulator as per permit requirements.
OMA 4 – SCORE	20/25 80%	
SUMMARY COMMENTS FOR OMA 4		
<p>The operator has procedures in place for auditing and quality assurance to control both internal and external auditing and QA. These procedures are carried out effectively and result in the submission of the required monitoring data to the regulator during normal working practices.</p> <p>As mentioned above, normal working practices have deviate during the pandemic and full correctly accredited third-party provision of lab services has not been available for all required parameters. The operator has endeavoured to resolve this issue throughout the pandemic and has achieved an ongoing improvement to the situation.</p>		