

OMA Report – Emissions to Air – EPR

Summary sheet		
Permit Number: BJ9703IM		Compliance Officer: Paul Challender
Operator: Kimberley Clark		Auditor (if different): N/A
Emission Point(s): A6, A7, A15		Others Present: N/A
OMA Sections		SCORE
OMA 1 – Management of monitoring		100%
OMA 2 – Periodic monitoring and test laboratories		100%
OMA 3 – Continuous monitoring		N/A
OMA 4 – Quality assurance		100%
		OVERALL SCORE
		100%
OVERALL SITE ASSESSMENT COMMENTS		Letter
		Variation
		Enforcement
Air emissions monitoring is well managed. Earlier minor deficiencies identified in previous OMAs have been addressed which, has led to the improved score. Management of monitoring is well controlled and implemented. All monitoring is undertaken by an MCERTS accredited contractor and the operator has a high level of quality assurance for the periodic monitoring activities carried out. Platforms and ports have not been assessed in this remote OMA audit. This element will be assessed in the next scheduled EPR visit and a new OMA Report will be generated for the part OMA.		
		Date of audit: 08/03/22
		Signed: 
		Date: 08/03/22

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	5	Schedule for air 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	25/25	
SUMMARY COMMENTS FOR OMA 1		
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. 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. The site has a document management system that records variations to all EMS documentation. Staff have access to EMS documentation electronically. Air emissions monitoring is carried out by external contractors to the permit requirements which are replicated in PR-25815. The emissions monitoring contract is reviewed annually and contractors are scheduled to allow sufficient time for a review and approval of SSPs to take place in line with the template in PR-25815 before monitoring begins. Monitoring results are reviewed when the contractor's report is audited and are tracked on the monitoring data spreadsheet as part of the wider monitoring data reviews. Daily, monthly and quarterly management meetings and reviews consider compliance and engineering issues. Relevant staff have received logged internal training relating to the monitoring requirements of the EPR permit.		

OMA 2: Periodic monitoring and test laboratories		
OMA ELEMENTS	SCORE	COMMENTS
A. Sampling provisions	N/A	Not assessed in this remote OMA. This element will be examined on the next scheduled EPR visit.
B. Certification of equipment	5	MCERT contractor carries out monitoring using certified instruments
C. Measurement methods and standards	5	Contractor has MCERTs accreditation for the relevant determinands and methods.
D. Calibration methods	5	MCERTs accredited contractor used. Calibration evidence provided to operator.
E. Frequency of maintenance and calibration	5	MCERTs accredited contractor used. Calibration evidence provided to operator.
F. Reliability of methods and equipment (data availability)	N/A	N/A
G. Breakdown response	N/A	N/A
H. Traceability	5	
OMA 2 – SCORE	25/25	
SUMMARY COMMENTS FOR OMA 2		
All monitoring is carried out by a contractor with MCERTs accreditation for relevant determinands and methods. Certified instruments are used, and calibration certificates checked at each monitoring event. Sampling platforms and ports were not assessed in this remote OMA. This element will be examined on the next scheduled EPR visit.		

OMA 3: Continuous monitoring		
OMA ELEMENTS	SCORE	COMMENTS
A. Provisions for monitoring and location of continuous monitors	N/A	N/A
B. Certification of continuous monitoring	N/A	N/A
C. Do not assess for air, water only	N/A	N/A
D. Calibration methods	N/A	N/A
E. Frequency of maintenance and calibration	N/A	N/A
F. Reliability of equipment (data availability)	N/A	N/A
G. Breakdown response	N/A	N/A
H. Traceability	N/A	N/A
OMA 3 – SCORE	N/A	N/A
SUMMARY COMMENTS FOR OMA 3		
N/A		

OMA 4: Quality assurance		
OMA ELEMENTS	SCORE	COMMENTS
A. External quality control schemes	5	All monitoring activities are MCERTS accredited
B. Internal data QC	5	MCERTS accredited contractor used.
C. Competence of monitoring personnel	5	MCERTS accredited contractor used.
D. Auditing of monitoring	5	Monitoring audit procedures defined in PR-25823.
E. Audit compliance	5	Outcomes logged and evidenced.
F. Reporting	5	Reporting for periodic monitoring for emissions to air meets permit requirement
OMA 4 – SCORE	30/30	
SUMMARY COMMENTS FOR OMA 4		
All periodic monitoring activities for emissions to air are MCERTS accredited. Competence of monitoring personnel is reviewed as part of the pre-monitoring audit of the SSP and certification is checked for validity during the monitoring activity by a member of staff. Data is compared against expected values from previous monitoring and is reviewed on receipt of contractor's report. PR25815 contains the template for the auditing of the SSP, onsite monitoring activity and report review process. Audits are carried out at every visit and records retained.		