

OMA Report – Emissions to Air – EPR

Summary sheet		
Permit Number: BL1096IB	Compliance Officer: Lara Cubley	
Operator: Hanson - Padeswood	Auditor (if different): Rob Hester	
Emission Point(s):A8 (Kiln 4)	Others Present: Ian Oakes	
OMA Sections		SCORE
OMA 1 – Management of monitoring		88%
OMA 2 – Periodic monitoring and test laboratories		100%
OMA 3 – Continuous monitoring		97%
OMA 4 – Quality assurance		73%
		91%
		OVERALL SCORE
OVERALL SITE ASSESSMENT COMMENTS		Letter
		Variation
		Enforcement
Date of audit:15/12/2021		
Signed:		
Date:		

OMA 1: Management of monitoring		
OMA ELEMENTS	SCORE	COMMENTS
A. Documentation of management system procedures for monitoring	5	Procedures/policies provided for auditing of monitoring/reports, CEM reporting, abnormal ops, monitoring SWP, start/shut-down.
B. Organisational structure for monitoring	3	High level organogram available but no detail regarding responsibilities for monitoring. Job descriptions available that indicate responsibility for CEM management, but no detail Deputisation: No formal deputy in place for CEM maintenance/QAL3. 2 x Apprentices to start soon, to shadow the instrument technician, apprentices expected to undergo formal training and be competent to follow procedures for maintenance and QAL3
C. Schedules and planning of monitoring, including contingencies	4	Annual requirements are listed in spreadsheet managed by Site Manager (SM). Dates for monitoring are logged and SM updates once NRW reporting requirements are completed.
D. Monitoring records and use of monitoring data	5	Previous days data is discussed at daily meetings. Data is downloaded by shift manager overnight, reviewed and findings logged. Reviewed by Wes and shift manager and raised as standing item at daily morning meetings
E. Understanding the requirements of the permit and monitoring methods	5	Evidence of liaison between operator staff and monitoring lab regarding previous monitoring and future requirements. An established relationship between operator and monitoring lab, and a high level of technical understanding and support is evidence through correspondence and meetings.
OMA 1 – SCORE	22 / 25 = 88%	
SUMMARY COMMENTS FOR OMA 1		
Overall, the procedures and documentation related to monitoring is well established, but improvements could be made regarding specific role responsibilities for monitoring activities (ie. responsible person for booking monitoring, reviewing reports, conducting audits). Additionally, it		

would be beneficial if formal deputies are appointed and trained for monitoring tasks related to the CEM. Currently, there is only one person fully competent for QAL3 and CEM maintenance, and this create a risk of CEM going out control if tasks can not be completed due to unexpected staff absence.

Action: Operator to ensure deputies are identified and trained to be competent in any activities regarding CEM maintenance and ongoing quality assurance.

OMA 2: Periodic monitoring and test laboratories		
OMA ELEMENTS	SCORE	COMMENTS
A. Sampling provisions	5	Facilities are well established and provide provisions for all monitoring to be conducted without deviations, despite the presence of obstructions around some of the ports. All flow criteria compliant with requirements of BS EN 15259. Homogeneity test previously completed and compliant
B. Certification of equipment	5	MCERTS-accredited lab. Full list of equipment serial numbers provided on p12 of Element sampling reports.
C. Measurement methods and standards	5	All methods/standards as per guidance in Monitoring stack emissions: techniques and standards for periodic monitoring. No deviations.
D. Calibration methods	5	MCERTS-Accredited lab. Full list of calibrated instruments provided in reports. Element staff provided evidence of UKAS approved calibration procedures
E. Frequency of maintenance and calibration	5	MCERTS-Accredited lab. 3 x certificates chosen at random and valid calibration certificates were provided by Element for Dry Gas Meter, 20m Heated line and Horiba, which cover the period the monitoring was undertaken. Element online Calibration Database maintains oversight of calibration requirements
F. Reliability of methods and equipment (data availability)	5	MCERTS-Accredited lab. Element online 'Maintenance Database' keeps track of maintenance requirements of all equipment, at set frequencies for preventative maintenance. Central office staff are fully trained for maintenance on all equipment
G. Breakdown response	5	MCERTS-Accredited lab. Adequate spares available for all materials and equipment. Replacement analysers can be sourced within 24hrs if required

H. Traceability	5	MCERTS-Accredited lab.
OMA 2 – SCORE	40 / 40 = 100%	
SUMMARY COMMENTS FOR OMA 2		
Management and implementation of periodic monitoring was shown to be undertaken to a very high level.		

OMA 3: Continuous monitoring		
OMA ELEMENTS	SCORE	COMMENTS
A. Provisions for monitoring and location of continuous monitors	5	Facilities are well established and provide provisions for all calibration activities to be undertaken, despite the presence of obstructions around some of the ports. All flow criteria compliant with requirements of BS EN 15259. Homogeneity test previously completed and compliant
B. Certification of continuous monitoring	5	All equipment is MCERTS certified. SICK MCS100 E HW – gaseous SICK 3010 EuroFID - VOCs SICK FW101 – particulates
C. Do not assess for air, water only	N/A	N/A
D. Calibration methods	5	All calibration methods are applied correctly, and a documented procedure and schedule is available for QAL3 and zero/span checks
E. Frequency of maintenance and calibration	5	All maintenance and calibration exercises in line with requirements
F. Reliability of equipment (data availability)	5	>95% availability as reported
G. Breakdown response	4	No contract for current CEMS. Option of transportable CEM provided by element in case of breakdown
H. Traceability	5	All gases certified and traceable. Equipment and procedures used in calibration are fully traceable.
OMA 3 – SCORE	34 / 35 = 97%	
SUMMARY COMMENTS FOR OMA 3		
The operator illustrated a high standard of continuous monitoring on the A8 – Kiln 4 stack. Calibrations have been conducted in accordance with the requirements of EN 14181, and ongoing quality assurance activities are implemented effectively. A maximum score for OMA3 could be		

achieved with improvements to the breakdown response arrangements, but it is noted that the operator is in the process of commissioning new MCERTS CEMs and DAHS for the Kiln 4 stack.

Recommendation: ensure suitable breakdown response is in place for new CEMS.

OMA 4: Quality assurance		
OMA ELEMENTS	SCORE	COMMENTS
A. External quality control schemes	5	Element are UKAS lab and take part in the NPL proficiency tests as part of their accreditation.
B. Internal data QC	4	SM demonstrated how data is reviewed for ongoing compliance and plant operation, in addition to how it is extracted and assessed for validity. DAHS is not MCERTS certified but is sufficiently secured and traceable to provide confidence in the traceability of the data
C. Competence of monitoring personnel	5	Element staff are fully MCERTS accredited.
D. Auditing of monitoring	1	There was not enough evidence of formal audit to assess this element. The guidance for OMA 4D states, <i>“It is a requirement of a certified management system that audits are carried out to assess its performance and effectiveness. The site must have carried out enough audits to assess this element. If there are not enough audits to confidently assess this element, a score 1 should be given.”</i>
E. Audit compliance	2	Evidence was provided of meetings (4 & 5/11/2021) where results of monitoring discussed and actions raised and close-outs agreed, but these were not based on audits that follow a formal procedure. The guidance states that scoring for this element should linked to 1D and advises that <i>“the site must have carried out enough audits to assess this element. If there are not enough audits to confidently assess this element score 1.”</i>
F. Reporting	5	Reporting meets requirements of the permit, MCERTS and analytical labs.
OMA 4 – SCORE	22 / 30 = 73%	
SUMMARY COMMENTS FOR OMA 4		

The most recent OMA guidance states that elements 4D & 4E should be scored 1 if there are not enough audits conducted to confidently assess these elements. While some evidence of review of monitoring activities and reports was provided by the operator, no evidence of formal audits, and was available. Guidance documents have been created by the EA, to aid operators in auditing monitoring SSPs, reports and on-site sampling activities. This document can be obtained from the site inspector and used as a guide in performing audits.

Action: Introduce formal procedure for audit and audit and compliance, utilising the EA guidance document if necessary