OMA Report – Discharges to Water – EPR

Summary sheet		
Permit Number: NP3335GR	Compliance Officer: Paul	
Operator: Solutia	Auditor (if different): N/A	
Discharge point(s): W1 & W2	Others Present: N/A	

OMA Sections		SCORE
OMA 1 – Management of monitoring		84%
OMA 2 – Periodic monitoring and test laboratories		100%
OMA 3 – Continuous monitoring		93%
OMA 4 – Quality assurance		80%
	OVERALL SCORE	90%
OVERALL SITE ASSESSMENT COMMENTS		Letter Variation Enforcement

Monitoring at the site is well managed with certain aspects being delegated to MCERTS contractors and laboratories.

The operator’s site was previously a permitted chemical work but now the only remaining permitted elements are in relation to managing goundwater at the site prior to discharge. As such the site now falls outside of the wider corporation’s certified management system and possesses documented procedures that are derived from the former management system or have been created to manage this site of limited operations.

On the whole monitoring and reporting is managed and controlled well, with experienced staff who comply with existing monitoring procedures, log, review and compare data, organise sample collection and, recalibration. NRW currently has no concerns with monitoring data, collection, analysis or reporting.

Deficiencies at the site are minor and relate to formal documentation not being accredited to a standard and it’s diffuse in nature in some circumstances. Primarily this is evident in formal audit procedures, see below for details.

Date of audit: 01/04/22
Signed:
Date: 01/04/22

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OMA 1: Management of monitoring		
OMA ELEMENTS	**SCORE**	**COMMENTS**
A. Documentation of management system procedures for monitoring	3	Written procedures are sufficient to control the act of monitoring
B. Organisational structure for monitoring	4	Comprehensive however, deputies not identified within the document
C. Schedules and planning of monitoring, including contingencies	5	Detailed to a level required for the site
D. Monitoring records and use of monitoring data	5	Procedures exist for review and observations are acted upon
E. Understanding the requirements of the permit and monitoring methods	4	Generally, very good but there has been a recent issue with the reporting of TOC.
OMA 1 – SCORE	21/25	

SUMMARY COMMENTS FOR OMA 1
Written procedures to control monitoring are not part of a third-party certified management system, they do however control the process for the site caretaker with all sampling conducted as required. These procedures are transposed from the historic certified ISO system that existed for the site when it was a fully permitted facility. The organisational structure is comprehensive identifying numerous tasks for various personel in granular detail. Although it is known that a deputy with extensive site knowledge exists for the operation, the deputy is not identified for on site tasks. Similarly, deputies for post monitoring review and audit are not identified in procedures. Scheduling is simple but comprehensive for the site which, in this case can be regarded as a benefit. During the last EPR inspection the CEMS flow meter for final discharge was inspected and calibration checked to inform this section of the OMA assessment. Data received from accredited lab and the operator has procedures to conduct reviews and identify pertinent trends including escalation to management. The person responsible for the implementation of monitoring at the site has a good understanding of the permit requirements, methods, organises the third-party accredited lab sampling, reviews generated data and submits it to NRW. There was a recent omission in the reporting of Total Organic Carbon (TOC) which, has been dealt with as a breach in an earlier Compliance Assessment Report (CAR_NRW0039020). This is covered in OMA 4F.

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OMA 2: Periodic monitoring and test laboratories		
OMA ELEMENTS	**SCORE**	**COMMENTS**
A. Sampling provisions	5	Sampling points are safe and suitable
B. Certification of equipment	N/A	N/A
C. Measurement methods and standards	5	Samples analysed at an third-party accredited laboraoty using permitted methods.
D. Calibration methods	5	Third-party MCERTS laboratory
E. Frequency of maintenance and calibration	5	Third-party MCERTS laboratory
F. Reliability of equipment (data availability)	5	Third-party MCERTS laboratory
G. Breakdown response	5	Third-party MCERTS laboratory
H. Traceability	5	Third-party MCERTS laboratory
OMA 2 – SCORE	35/35	

SUMMARY COMMENTS FOR OMA 2
Periodic monitoring is sampled by on site staff and samples are relayed to an external third-party MCERTS laboratory for analysis. Sampling takes place according to a schedule with full liaison with the laboratory ensuring that any lack of service is flagged, and alternate suitable arrangements can be arranged.

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OMA 3: Continuous monitoring		
OMA ELEMENTS	**SCORE**	**COMMENTS**
A. Provisions for monitoring and location of continuous monitors	5	MCERTS accredited flow meter.
B. Certification continuous monitors	5	MCERTS accredited flow meter
C. Measurement methods and standards	4	Methods are appropriate for permit requirements. Formal review processs for a major change not documented.
D. Calibration methods	5	Flow meter calibrated by MCERTS contractor.
E. Frequency of maintenance and calibration	5	Calibration is carried out under external MCERTS accreditation.
F. Reliability of methods (data availability)	4	Valid results are produced at least 95% of the time.
G. Breakdown response	4	Breakdown response contract in place.
H. Traceability	5	Calibration carried out by an MCERTS contractor.
OMA 3 – SCORE	37/40	

SUMMARY COMMENTS FOR OMA 3
With regard to continuous monitoring the site is required to monitor flow only. This is achieved with an on-line electromagnetic flow meter as per permit requirements. The flow meter is maintained and calibrated under contract with and MCERTS contractor. Although, breakdown is managed in this contract a documented procedure for call out does not exist. In addition, a procedure for formal review due to a major change such as replacement of the flow meter is not evident.

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OMA 4: Quality assurance		
OMA ELEMENTS	**SCORE**	**COMMENTS**
A. External quality control schemes	5	Eternal UKAS accredited laboratory utilised.
B. Internal data QC	5	Eternal UKAS accredited laboratory utilised.
C. Competence of monitoring personnel	5	Eternal UKAS accredited laboratory utilised.
D. Auditing of monitoring	3	Some auditing conducted.
E. Audit compliance	2	Corrective actions implemented but lacking formal audit records and procedures
F. Reporting	3	TOC unreported in the last returns
OMA 4 – SCORE	24/30	

SUMMARY COMMENTS FOR OMA 4

Continuous monitoring and external laboratory analysis are conducted under MCERTS at a UKAS accredited laboraroty and by an accredited provider for the flow meter.

The auditing procedures for the site are wanting. There is no longer a certified management system for the Cefn Mawr. There is an element of documented review and control evidenced in the Cefn Mawr Site Responsibilities and Duties document and further details for data in the Environmental Reporting Procedure GN 7806. The documented procedural information, however, is not a consolidated audit procedure. As such, outcomes from formal audits cannot be reviewed and assessed.

It should be noted, however, that issues are identified, escalated where appropriate, resolved and communicated. Furthermore, monitoring is conducted as required by the permit conditions and reported within relevant timescales. In this sense monitoring is controlled and reviewed but in a diffuse manner.

There was a recent omission in the reporting of Total Organic Carbon (TOC) which, has been dealt with as a breach in an earlier Compliance Assessment Report (CAR_NRW0039020). TOC was the only parameter to be unreported. It was however, sampled and analysed for under the required standard and upon communication with the operator the omission was immediately resolved.