

OMA Report – Emissions to Air - EPR

Summary sheet		
Permit Number: BX4666IZ		Compliance Officer: Jim McClymont
Operator: Qioptiq		Auditor (if different): N/A
Emission Point(s): A2, A5, A7, A10 & A11		Others Present: Philip Barrett (NRW), Stephen Lloyd & Huw Williams (Qioptiq)
OMA Sections		SCORE
OMA 1 – Management of monitoring		19 / 25
OMA 2 – Periodic monitoring and test laboratories		38 / 40
OMA 3 – Continuous monitoring		N/A
OMA 4 – Quality assurance		22 / 30
		OVERALL SCORE 83 %
OVERALL SITE ASSESSMENT COMMENTS		Letter
		Variation
		Enforcement
		Date of audit: 22.11.2017
		Signed: J McClymont
		Date: 18.12.2017

OMA 1: Management of monitoring		
OMA ELEMENTS	SCORE	COMMENTS
A. Documentation of management system procedures for monitoring	4	Procedures are in place for scheduling monitoring but not all are documented. Such procedures could be documented and improved, particularly for control/appointment of contractors to ensure they all have MCERTS accreditation prior to appointment, as required by the Permit. It is acknowledged that this contract has been set up for some time and SSPs are produced by the contractor in advance of monitoring. Monthly sampling of S1 is conducted by DCWW and Chemist.
B. Organisational structure for monitoring	5	MP1 Optical Shop Management Procedure (Issue 7, 01.03.2017) clearly states responsibility of Environmental and COSHH Engineer for monitoring issues. Sufficieint resources are always available for monitoring.
C. Schedules and planning of monitoring, including contingencies	4	SHE system has an access database with monitoring entered annually and reminders generated. EMS & QMS Master Action Plan access database is used to record actions required following receipt of monitoring results, e.g. rescheduling of sampling.
D. Monitoring records and use of monitoring data	3	Monitoring data and contractor's reports are reviewed by the Environmental and COSHH Engineer and the Site Services Manager and and actions recorded on the EMS & QMS Master Action Plan as required. It is recommended that a documented procedure be followed to ensure that results are reviewed and data used appropriately. This should cover Permit compliance and trending, review against initial risk assessments (H1), provision for escalation, process operation improvements, and sharing with management.

E. Understanding the requirements of the permit and monitoring methods	3	Environmental and COSHH Engineer works with contractors to ensure monitoring is conducted appropriately. It is understood that the Environmental and COSHH Engineer has received no formal OMA or MCERTS Awareness training to date.
OMA 1 – SCORE	19 / 25	
SUMMARY COMMENTS FOR OMA 1		
The following improvements are recommended: 1. Documented procedures should be improved, particularly for control/appointment of contractors to ensure all testing has MCERTS accreditation prior to appointment, as required by the Permit. 2. Provision of a documented procedure to ensure results are reviewed and data used appropriately. This should cover the Permit compliance and trending, review againsts initial risk assessments (H1), provision for escalation, process operation improvements, and sharing with management. 3. OMA and MCERTS awareness training is recommended for the Environmental and COSHH Engineer responsible for management of monitoring emissions to air.		

OMA 2: Periodic monitoring and test laboratories

OMA ELEMENTS	SCORE	COMMENTS
A. Sampling provisions <i>Critical Element</i>	3	Some of the monitoring access ports do not appear to meet the requirements of M1. Some locations (A2) do not have properly constructed and sealed access ports. They are currently sealed with tape. Other access ports do comply with M1, such as A1. Monitoring reports state that improvements to some monitoring access ports are required to meet the standards of M1. The Operator should review the monitoring access ports and provisions against the requirements of M1 and instigate a programme of improvements where required.
B. Certification of equipment	5	All the instrumentation has MCERTS certification for the relevant determinands and ranges where available.
C. Measurement methods and standards <i>Critical element</i>	5	The Contractor is using BS EN 13284-1 instead of ISO 9096 for measurement of particulate matter. An explanation was provided by the monitoring contractor - ISO 9096 was withdrawn from TGN M2 in 2013. Although EN 13284-1 was validated for low concentrations, it can be used to measure stack gas emissions with high particulate concentrations. It was no longer possible to have MCERTS accreditation for ISO 9096 after 30 September 2014.
D. Calibration methods <i>Critical element</i>	5	MCERTS Contractor employed.
E. Frequency of maintenance and calibration	5	As above.
F. Reliability of equipment (data availability)	5	As above.
G. Breakdown response	5	Contractor employed for annual monitoring. A back up approved contractor is available.

H. Traceability	5	UKAS and MCERTS methods employed
OMA 2 – SCORE	38 / 40	
SUMMARY COMMENTS FOR OMA 2		
The following improvements are recommended: 1. The Operator should review the monitoring access ports and provisions against the requirements of M1 and instigate a programme of improvements identified. 2. The Operator should seek permission from NRW if monitoring methods required are to be changed.		

OMA 3: Continuous monitoring		
OMA ELEMENTS	SCORE	COMMENTS
A. Provisions for monitoring and location of CEMs <i>Critical Element</i>	N / A	
B. Certification of CEMs	N / A	
C. Calibration methods <i>Critical element</i>	N / A	
D. Frequency of maintenance and calibration	N / A	
E. Reliability of equipment (data availability)	N / A	
F. Breakdown response	N / A	
G. Traceability	N / A	
OMA 3 – SCORE	N / A	
SUMMARY COMMENTS FOR OMA 3		
This section of the report is not applicable.		

OMA 4: Quality assurance		
OMA ELEMENTS	SCORE	COMMENTS
A. External quality control schemes	5	MCERTS contractor employed.
B. Internal data quality control	3	See section 1D.
C. Competence of monitoring personnel	5	Monitoring personnel employed on site are all stated to have attained MCERTS Level 2. This is verified by certificates.
D. Auditing of monitoring	2	The Operator checks the Contractor and calibrations, however, there is no formal auditing plan or procedure to specifically cover monitoring. Such checks are therefore not formally reported. It is recommended that auditing procedures at the site include monitoring and that such audits are documented.
E. Audit compliance	2	See above.
F. Reporting	5	The contents of the monitoring report meet the permit requirements in all aspects and are to an acceptable standard.
OMA 4 – SCORE	22 / 30	
SUMMARY COMMENTS FOR OMA 4		
The following improvements are recommended: 1. Auditing plans and procedures at the site should be expanded to include monitoring. Such audits should be documented.		