

OMA Report – Emissions to Air – EPR

Summary sheet			
Permit Number: AB3492ZQ		Compliance Officer: Rebecca Harwood	
Operator: Lloyds Animal Feeds (Western) Ltd		Auditor (if different):	
Emission Point(s): A1, A2, A3		Others Present: Jamie Blythin	
OMA Sections			SCORE
OMA 1 – Management of monitoring			84%
OMA 2 – Periodic monitoring and test laboratories			93%
OMA 3 – Continuous monitoring			N/A
OMA 4 – Quality assurance			80%
		OVERALL SCORE	86%
OVERALL SITE ASSESSMENT COMMENTS			Letter
			Variation
			Enforcement
An OMA was conducted remotely with Lloyds Animal Feeds (Western) Ltd providing documents for NRW to review. A follow up visit was arranged for 17 February 2022 when an inspection of the platforms and emission points was undertaken. Air monitoring is undertaken by an MCERTS accredited contractor. Air emissions are managed well, with a few minor recommendations suggested below relating to staff awareness and their responsibilities in relation to emissions and permit requirements, and a tightening of the monitoring review procedures.			
		Date of audit: 17.02.2022	
		Signed: <i>Rebecca Harwood</i>	
		Date: 28.03.2022	

OMA 1: Management of monitoring		
OMA ELEMENTS	SCORE	COMMENTS
A. Documentation of management system procedures for monitoring	4	Document OP11 – Environmental Air Emissions Monitoring details the responsibilities and procedures for undertaking the emissions monitoring. It doesn't specify the monitoring that is required which could be useful in case another member of staff was required to instigate any monitoring at short notice. Document OP11 states the contractor is obliged to furnish the site with a Site Specific Protocol (SSP) before the testing takes place. SSP from the contractor was supplied but was unsigned. The Operator stated that this is reviewed by site prior to the monitoring and confirmed by email although this was not evidenced.
B. Organisational structure for monitoring	5	The LAW organisation chart (dated 2017) identifies individuals and responsibilities for different types and stages of monitoring. It identifies the Site Operations Manager as having responsibility for organising external testing, and a deputy is named. It was confirmed on site that this structure chart is current and there have been no staff changes. Document OP11 reiterates that the Site Operations Manager is responsible for the selection and approval of the company contracted to carry out the emissions monitoring and for ensuring that they are MCERTS certified.
C. Schedules and planning of monitoring, including contingencies	4	Document OP11 states that the Site Operations Manager is responsible for agreeing the Air Emissions Monitoring Schedule with the relevant company. There is no actual schedule to ensure monitoring is not missed although it is regularly discussed in management meetings. The monitoring is also recorded on the wall in the Site Managers office along with other routine activities that need to be completed.

D. Monitoring records and use of monitoring data	5	Results from all emissions monitoring are reviewed at a regular operations meeting, which is documented. Emissions Testing Review 2021.doc plots data graphically from 2017. Results are also reviewed as part of the EMS meetings as detailed in Document SP10. The review of data confirms a pass or fail in relation to the permitted limits. The Operator states that results which fall outside of target limits will be investigated and repeat tests requested if needed. There have been no emissions breaches to date so this has not been tested.
E. Understanding the requirements of the permit and monitoring methods	3	Staff receive environmental training relating to permitting and EMS systems including fugitive emissions protocols. There are also procedures for selected staff which include reacting to dust emission alarms, team leader checklists and a daily log of dust detection device performance. An example Team Leader annual review was submitted and this should pick up any relevant changes to the permit and monitoring as and when they occur. There is no specific training for staff relating to the monitoring procedures as all testing is done by outside contractors. Responsibilities in and around the arrangements for and reviews of testing are outlined in the organogram and OP11.
OMA 1 – SCORE	21/25	
SUMMARY COMMENTS FOR OMA 1		
Both OP11: Environmental Air Emissions Monitoring and SP10: Management Review are dated 01 May 2018 and form part of the site's EMS. The Operator has provided evidence that the EMS is reviewed annually. It is recommended that all the documents are updated accordingly with the last review date detailed. The Structure Chart is also dated 2017 and should be reviewed annually to ensure it remains up to date. The Operator should improve awareness and training of staff to ensure the reasons why the monitoring is required are understood and what the results may indicate.		

It would be beneficial if someone from the company undertook some MCERTS / air monitoring training.

Action: Ensure approvals relating to the SSP and any deviations are documented and saved.

OMA 2: Periodic monitoring and test laboratories		
OMA ELEMENTS	SCORE	COMMENTS
A. Sampling provisions	3	SSP states that the sampling location meets all the requirements specified in EA Guidance Note M1 and EN15259. The monitoring ports have been retrospectively installed due to the age of the facility. The monitoring contractor has identified sampling location restrictions and has implemented sampling deviations, these are identified within the reports and are acceptable to meet the standard. A review of the sampling platforms on site did not highlight any further concerns as these are permanent structures. The Operator confirmed they undertake monthly checks of the platforms and evidence was provided.
B. Certification of equipment	5	MCERTS accredited. Equipment used as detailed on p11 of sampling reports.
C. Measurement methods and standards	5	MCERTS accredited. Relevant methods are complied with in full and reflect those listed in the permit.
D. Calibration methods	5	MCERTS accredited.
E. Frequency of maintenance and calibration	5	MCERTS accredited. Full list of calibrated instruments provided in reports.
F. Reliability of methods and equipment (data availability)	N/A	Not assessed
G. Breakdown response	N/A	Not assessed
H. Traceability	5	MCERTS accredited.
OMA 2 – SCORE	28/30	

SUMMARY COMMENTS FOR OMA 2

MCERTS accredited lab used to undertake testing and the Operator confirmed they issue a permit to work to the Contractor.

It is noted that all three monitoring reports state that water droplets were present during the preliminary stack survey. BS EN 13284-1 states that where droplets are present then out-stack filtration should be employed (to prevent saturation of the filter). Despite this, in the appendix it is stated that in-stack filtration is employed during the TPM run. From looking at the stack gas characteristics (moisture, temp etc) it suggests there would be no water droplets present and in-stack sampling is therefore acceptable. It appears this maybe be a typo in the report, but one that appears in all three reports. It may also have an impact on some of the calculations regarding stack gas density/flow rates etc. This should be followed up by the Operator with the monitoring contractor.

OMA 3: Continuous monitoring – N/A		
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		

OMA 4: Quality assurance		
OMA ELEMENTS	SCORE	COMMENTS
A. External quality control schemes	5	MCERTS accredited lab. Competent staff identified within report.
B. Internal data QC	5	MCERTS accredited lab. Document OP11 states that the Site Operations Manager is responsible for reviewing the results and ensuring compliance with the relevant regulations. Emissions data is plotted graphically so trends can be seen.
C. Competence of monitoring personnel	5	3rd party air monitoring personnel are appropriately MCERTS certified.
D. Auditing of monitoring	2	Document SP09: Environmental Audit was supplied. The procedure identifies the company's process for monitoring and evaluating compliance with the EMS. The auditee will raise a corrective action plan and ensure it is communicated and implemented. Evidence of a previous audit was reviewed. This contained information regarding the results but not any auditing of the monitoring contractor or their procedures. There does not appear to be a specific procedure for the auditing of monitoring contractors during the monitoring events, although checks on equipment and personnel are completed by the maintenance team prior to the permit to work being issued.
E. Audit compliance	2	Document SP09 states that audit findings are recorded on the Internal Audit Report, and the auditee will raise a corrective action plan and ensure it is communicated and implemented. Evidence of a previous audit was reviewed. No non compliances were raised within it so it is not possible to

		determine whether appropriate corrective actions are identified and completed. The EMS Team review and analyse audit findings as part of the annual Management Review.
F. Reporting	5	MCERTS accredited lab. Data submitted to NRW in accordance with permit.
OMA 4 – SCORE	24/30	
SUMMARY COMMENTS FOR OMA 4		
All monitoring activities are MCERTS accredited and carried out by a MCERTS contractor with monitoring reports submitted to the operator. The monitoring contractor has not been audited during the monitoring events. The operator assesses the results in their Operations meeting and the annual EMS meeting to review any issues arising from the report, as detailed in OP11. There is no additional written procedure for the review of data, addressing issues or logging progress of actions should they arise. Action: Establish a written procedure for the auditing of MCERTS contractors and their activities during monitoring events. Action: Add further detail into your existing procedures to document how any non-compliances would be addressed.		