

OMA Report – Emissions to Air - EPR

Summary sheet			
Permit Number: BT4885IT		Compliance Officer: Alison Soper	
Operator: UPM Kymmene Ltd		Auditor (if different): Lara Cubley	
Emission Point: A20		Others Present: Kevin Smith, Andrew Bronnert, John Sanderson – all UPM, Mark Woodruff - ESG	
OMA Sections			SCORE
OMA 1 – Management of monitoring			23/25
OMA 2 – Periodic monitoring and test laboratories			40/40
OMA 3 – Continuous monitoring			33/35
OMA 4 – Quality assurance			26/30
		OVERALL SCORE	94%
OVERALL SITE ASSESSMENT COMMENTS			Letter
			Variation
			Enforcement
Actions The QAL3 procedures need checking to ensure that the calibration is being carried out correctly and drift or changes in precision are identified and acted upon correctly. This will be checked during the next inspection. The procedures for changing span gas bottles need to be followed to ensure that they remain in date. Training of additional staff to deputise for the Utilities Manager must be a priority.			
		Date of audit: 6 th October 2015	
		Signed: 	
		Date: 25 th November 2015	

OMA 1: Management of monitoring		
OMA ELEMENTS	SCORE	COMMENTS
A. Documentation of management system procedures for monitoring	5	There is a site EMS certified to ISO14001 and EMAS. Procedures within EMS – QPROC 0095 (Quality assurance procedure for monitoring of emissions to air from Boiler 7)
B. Organisational structure for monitoring	5	QPROC 0095 lists those responsible for aspects of monitoring. An organisational chart was viewed showing the lines of responsibility.
C. Schedules and planning of monitoring, including contingencies	4	No schedule, plan is based on permit requirements (listed in EMS) and drawn up annually when contract renewed.
D. Monitoring records and use of monitoring data	5	Contractor's reports reviewed. Real time CEMs results available to staff in control room.
E. Understanding the requirements of the permit and monitoring methods	4	Utilities manager has good understanding. Other staff have been identified as needing better understanding
OMA 1 – SCORE	23	
SUMMARY COMMENTS FOR OMA 1		
Nearly all the monitoring is for emissions from the WID boiler, point A20, which has CEMs and twice yearly periodic monitoring requirements. This audit does not consider the monitoring of emissions from boilers 3 and 6. Procedure QPROC 0095 is within the ISO 14001 management system. It is a controlled document detailing how the requirements of the EPR permit regarding MCERTS will be met. There is no schedule for periodic monitoring, although there is a list of the permit monitoring requirements in the Regulation section of the management system with links to the permit document. Periodic monitoring is planned at the same time as the QAL 2 or AST with the contractor. A site specific protocol is provided which covers all aspects. Responsibilities are designated in the procedure, but at present there is no deputy due to staff changes. A new Utilities Process Engineer is to be appointed who will be trained up as deputy. Members of the engineering function have also been identified as needing an improved understanding.		

OMA 2: Periodic monitoring and test laboratories		
OMA ELEMENTS	SCORE	COMMENTS
A. Sampling provisions <i>Critical Element</i>	5	Fully compliant for A20
B. Certification of equipment	5	MCERTS accredited contractor
C. Measurement methods and standards <i>Critical element</i>	5	Methods all MCERTS
D. Calibration methods <i>Critical element</i>	5	Methods all MCERTS
E. Frequency of maintenance and calibration	5	All meets MCERTS requirements
F. Reliability of equipment (data availability)	5	No issues
G. Breakdown response	5	No issues
H. Traceability	5	MCERTS methods
OMA 2 – SCORE	40	
SUMMARY COMMENTS FOR OMA 2		
All the periodic monitoring is carried out by contractors with MCERTS accreditation. Methods used on site and back in the lab all meet the UKAS or MCERTS standards		

OMA 3: Continuous monitoring		
OMA ELEMENTS	SCORE	COMMENTS
A. Provisions for monitoring and location of CEMs <i>Critical Element</i>	5	Fully compliant
B. Certification of CEMs	5	CEMS have MCERTS certification
C. Calibration methods <i>Critical element</i>	3	The CEMS are calibrated to BS EN 14181 apart from HCl. Mixed span gas out of date
D. Frequency of maintenance and calibration	5	QAL 3 carried out automatically weekly. QAL 2 / AST annually. Maintenance by Quantitech twice a year
E. Reliability of equipment (data availability)	5	>98% reliable. Only 2 hours without data so far this year.
F. Breakdown response	5	Spare set of CEMS kept on site. Own maintenance staff able to set it up.
G. Traceability	5	Gases fully traceable
OMA 3 – SCORE	33	
SUMMARY COMMENTS FOR OMA 3		
The sampling provisions are fully compliant with TGN M1, EN 15259 and EN 13284. The CEMS are MCERTS certified. Maintenance is carried out by the CEMS supplier twice a year, and routine checks are carried out by internal technicians including checking gas pressures and expiry dates. Records of these checks are made and recent ones were viewed with all appearing to be compliant. However, the mixed span gas for calibration was out of date, although a spare bottle was available that was in date. Two spares are kept on site. The standard HCl span calibration cannot be carried out as the level is too low. A different method is used for the QAL 2 / AST by ESG, the contractor. The CEMS equipment is very reliable, but a complete spare set is kept on site which could be set up in about 2 hours. Demonstration of weekly QAL3 tests and the control charts was not available due to network problems. This will be followed up during a routine inspection.		

OMA 4: Quality assurance		
OMA ELEMENTS	SCORE	COMMENTS
A. External quality control schemes	5	Contractor has MCERTS accreditation and lab is UKAS for the relevant methods
B. Internal data quality control	3	Software system for QAL 3, but not clear how calibration data is responded to.
C. Competence of monitoring personnel	5	Contractors all have appropriate MCERTS qualifications
D. Auditing of monitoring	3	Audits carried out, but not on site audit programme
E. Audit compliance	5	Audit of contractor fully compliant
F. Reporting	5	Reporting as required, although reliant on Utilities Manager.
OMA 4 – SCORE	26	
SUMMARY COMMENTS FOR OMA 4		
The CEMS data is automatically corrected and is visible to process controllers. Alarms are set up for high levels. The calibration test data is within an independent computer system. It appears to be set up with upper and lower warning and alarm levels, but it was not clear how this had been done, and what action would be taken if any of the intervention scenarios occurred. Some aspects of quality assurance are reliant on the knowledge of the Utilities Manager. Auditing of contractors is carried out, but is not on the site's auditing system because it cannot be given a specific date, it is carried out when the contractor visits to do the monitoring. The EA guidance for auditing stack emissions monitoring is followed and all has been compliant with the current contractor. QPROC-0095 states that internal auditing will be performed annually by someone from outside the Utilities department. There isn't a specific audit to check against the monitoring requirements The contractor provides a full report of all the monitoring carried out including uncertainty calculations. Notifications of emission limit breaches are sent as required by the permit, and monitoring returns sent at the appropriate times.		