OMA Report – Discharges to Water – EPR

Summary sheet		
Permit Number:BR72321IK	Compliance Officer: Matthew Kelk	
Operator: Tata	Auditor (if different):	
Discharge point(s): W1and E1	Others Present:	

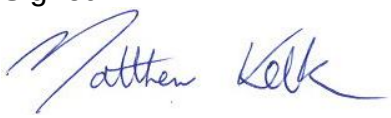
OMA Sections		SCORE
OMA 1 – Management of monitoring		92%
OMA 2 – Periodic monitoring and test laboratories		97%
OMA 3 – Continuous monitoring		100%
OMA 4 – Quality assurance		100%
	OVERALL SCORE	97%

OVERALL SITE ASSESSMENT COMMENTS	
	Letter
	Variation
	Enforcement

Tata have a high level of control over the monitoring of emissions to water from the facility.
This is reflected in a high score of 97%, an increase over the previous OMA to water in November 2012.

There is only one minor recommendation for improvement:-

Monitoring points are not labelled, it would aid identification in the rare instance that a member of staff not usually tasked with monitoring had to collect a sample.

Date of audit:1/06/2016
Signed: 
Date:27/06/2016

OMA 1: Management of monitoring		
OMA ELEMENTS	**SCORE**	**COMMENTS**
A. Documentation of management system procedures for monitoring	5	Water testing is contracted to Excova, UKAS accredited labs. Documents controlled by internal system
B. Organisational structure for monitoring	3	Defined personnel at Excova take and test samples. Adequate staff are always in place to deputise.
C. Schedules and planning of monitoring, including contingencies	5	Detailed schedules
D. Monitoring records and use of monitoring data	5	Detailed review carried out by lab and environmental management team.
E. Understanding the requirements of the permit and monitoring methods	5	Relevant experience and understanding by both lab and Tata staff
OMA 1 – SCORE	23/25	

SUMMARY COMMENTS FOR OMA 1

OMA 1A - Water samples are taken from the emission points and tested by Excova labs situated within the Tata Shotton site. Procedures are in place for the collection of samples and regularly reviewed, standard operating procedures were shown for each determinand tested for.

OMA 1B – Excova labs define key personnel for monitoring, adequate staff levels are always in place to deputise. Although this is not documented.

OMA 1C – Detailed documentation was shown for this aspect – Chemical services - Routine Environmental Monitoring schedule, fully details all determinands, monitoring frequency and method to be used.

OMA 1D – Results are entered into a daily spreadsheet, which contains the permitted emission limits. If any breaches this would trigger the lab to contact the environmental section and possibly carry out a resample to rule out any anomalies. Tata will decide if a resample is needed. Procedure available for out of consent data. The spreadsheet is forwarded to the environmental team daily for review. Ability to trend data if needed.

OMA 1E – Staff are very knowledgeable about the requirements of the permit and Excova showed in depth knowledge of the monitoring methods.

OMA 2: Periodic monitoring and test laboratories		
OMA ELEMENTS	**SCORE**	**COMMENTS**
A. Sampling provisions *Critical Element*	4	Representative samples, although not labelled.
B. Certification of equipment	5	Lab uses UKAS compliant equipment.
C. Measurement methods and standards *Critical Element*	5	UKAS accreditation, Gap analysis for deviation away from standard.
D. Calibration methods *Critical element*	5	UKAS accreditation – see below
E. Frequency of maintenance and calibration	5	UKAS accreditation – see below
F. Reliability of equipment (data availability)	5	Equipment is very reliable.
G. Breakdown response	5	Contingencies in place to deal with breakdowns
H. Traceability	5	UKAS
OMA 2 – SCORE	34/35	

SUMMARY COMMENTS FOR OMA 2
OMA 2A – Samples points are representative, sample points are known to samplers but it is advised that the points are labelled. OMA 2B – Labs are certified to UKAS/MCERTS, so all portable equipment is suitable. OMA 2C- Accreditation by UKAS for labs - a gap analysis has been carried out by Excova where methods deviate away from the standards. Document shows that the methods used are comparable to the standards required by the permit or exceed the required standard. OMA 2D – Lab is UKAS accredited, detailed calibration records were made available during the

audit. Analysis kit is calibrated before each use.

OMA 2E- Frequency of calibration is suitable to meet UKAS standards.

OMA 2F – Availability of data is over 95%, repeat analysis is rare.

OMA 2G – The labs have contingencies set up for breakdowns, breakdowns can be fixed rapidly and local labs are set to take samples if needed.

OMA 2H - Results fully traceable in accordance with the labs UKAS accreditation.

OMA 3: Continuous monitoring		
OMA ELEMENTS	**SCORE**	**COMMENTS**
A. Provisions for monitoring and location of CWMs *Critical element*	5	Location suitable – see below.
B. Certification of CWMs	5	MCERTS accreditation for flow meter.
C. Measurement methods and standards *Critical element*	5	Relevant method is certified to MCERTS,
D. Calibration methods *Critical element*	5	Flow meters are calibrated to a high standard.
E. Frequency of maintenance and calibration	5	Twice a year, kit is checked daily to ensure adequate signal.
F. Reliability of equipment (data availability)	5	Highly reliable kit, alternative calculation available too – see below
G. Breakdown response	5	Breakdown response is high, a back-up is available on site, which can be installed rapidly.
H. Traceability	5	Fully traceable.
OMA 3 – SCORE		

SUMMARY COMMENTS FOR OMA 3
OMA 3A - Location of flow meter shown, in compliance with methods in M18 guidance. OMA 3B - Flow rate meter last certified as MCERTS in 12 March 2013. Physical monitor is MCERTS, backup is not MCERTS though. OMA 3C – Methodology is to MCERTS standard.

OMA 3D – Calibrated to high standard and meets requirements of MCERTS.

OMA 3E - Flow meter is calibrated regularly, adequate data signal is checked on a more frequent basis.

OMA 3F – Equipment is reliable and alternative methodology can be used to back calculate flow, this methodology was shown during the audit.

OMA 4: Quality assurance		
OMA ELEMENTS	**SCORE**	**COMMENTS**
A. External quality control schemes	5	External accreditation to quality control scheme.
B. Internal data quality control	5	Appropriate AQC control in place, UKAS
C. Competence of monitoring personnel	5	All staff at excova are suitably trained
D. Auditing of monitoring	5	Full audits carried out by Tata
E. Audit compliance	5	Full compliance – see below
F. Reporting	5	Reporting is adequate
OMA 4 – SCORE	30/30	

SUMMARY COMMENTS FOR OMA 4

OMA 4A – Excova labs are part of the aquacheck scheme, external QC for all determinands, last certified 9 June 2015.

OMA 4B – Excova labs accredited to UKAS, appropriate AQC controls in place.

OMA 4C – Comprehensive training in place, training records were made available during the audit. Refresher training is frequent.

OMA 4D & OMA 4E – Trained staff carry out audits of monitoring and reports are comprehensive, actions are completed if needed.

OMA 4F – Adequate reporting for the requirements of the permit, monitoring is always submitted by specified deadlines.