OMA Report – Discharges to Water – EPR

Summary sheet		
Permit Number: BJ9703IM	Compliance Officer: Siân McGregor-Andrew	
Operator: Kellogg Company of GB Ltd.	Auditor (if different):	
Discharge point(s): W1 and W2	Others Present:	
OMA Sections		**SCORE**
OMA 1 – Management of monitoring		25/25
OMA 2 – Periodic monitoring and test laboratories		27/30
OMA 3 – Continuous monitoring		N/A
OMA 4 – Quality assurance		30/30
	OVERALL SCORE	96%
OVERALL SITE ASSESSMENT COMMENTS	Letter	
	Variation	
	Enforcement	
Excellent overall score achieved by the site. All minimum standards were met and site personnel demonstrated a high level of understanding of the monitoring and the environmental permit requirements. A number of minor actions to improve future scores were identified.	Date of audit: 21.06.2018	
	Signed: SC McGregor-Andrew	
	Date: 26.07.2018	

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OMA 1: Management of monitoring		
OMA ELEMENTS	**SCORE**	**COMMENTS**
A. Documentation of management system procedures for monitoring	5	Sufficient procedures are in place for surface water discharge monitoring and training within the site EMS
B. Organisational structure for monitoring	5	Organogram indicating responsible persons and role specifications identify responsibilities.
C. Schedules and planning of monitoring, including contingencies	5	Scheduling of routine monitoring is via the daily activity management system and completion of required actions is monitored.
D. Monitoring records and use of monitoring data	5	Procedures in place to ensure results are regularly reviewed against permitted limits and internal action triggers.
E. Understanding the requirements of the permit and monitoring methods	5	Site personnel demonstrate a good understanding of monitoring and permit requirements and appropriate training is in place.
OMA 1 – SCORE	25/25	

SUMMARY COMMENTS FOR OMA 1

1A - Sufficient procedures are in place for surface water discharge monitoring and training within the site EMS. A UKAS accredited lab is used for appropriate analysis for permitted ELVs, some in-house testing is carried out for process control. Procedures cover sampling, analysis equipment and methods, storage, permit limits and refer to recording documentation and review. Procedures cover both external and internal testing. Daily recroding sheets highlight both permitted limits and internal action trigger limits. Training on procedures relevant to each role is identified in a training matrix.

1B - Site organogram defines roles and reporting routes. Each shift has defined responsible persons and manager and a deputy is always available to ensure sufficient resources for monitoring and management. Structures make reference to the training matrix and associated procedures.

1C - Scheduling and planning of monitoring is via the daily managemt system for site collecting samples and carrying out in-house testing. Tasks are defined for each role and the EHS department oversee provision of in-house results daily. EHS department review daily to ensuire sampling and analysis is carried out as required.

1D - Procedures are in place to ensure recording of sample collection and analysis results. Discussion of results form part of the standing agenda of daily meetings and review of results would insitigate any repeat sampling or analysis required. Issues would be escalated to higher tier management meetings with all actions tracked via the company's comprehensive action tracking system. Internal action triggers are set below permitted limits and reviewed.

1E - Permit requirements are met and site personnel demonstrate a good understanding of the role and impaortance of monitoring in permit compliance and minimisation of environmental impact. Training matrix covers all roles involved in monitoring and higher level environmental permit awareness training is provided to managers.

OMA 2: Periodic monitoring and test laboratories

OMA ELEMENTS	SCORE	COMMENTS
A. Sampling provisions *Critical Element*	3	Sampling point is as stated in permit. Weir from balance lagoon to discharge pipe requires a scumboard to catch vegetation. Fridge used for sample storage prior to collection for offsite-testing does not have a max/min thermometer.
B. Certification of equipment	N/A	
C. Measurement methods and standards *Critical Element*	4	UKAS accredited laboratory used and in-house analysis carried out on site is for process control. Methods are suitable with no significant interference. Lab is accredited to ISO17025
D. Calibration methods *Critical element*	5	UKAS accredited laboratory used and in-house analysis carried out on site is for process control on externally calibrated equipment.
E. Frequency of maintenance and calibration	5	. In-house maintenance and calibration by external contractors is part of site-wide schedule. Records available.
F. Reliability of equipment (data availability)	5	Sample results and associated records indicate that repeat analysis or rescheduling of samples is rare.
G. Breakdown response	N/A	UKAS accredited laboratory used. In-house test equipment is readily replaceable.
H. Traceability	5	UKAS accredited lab used.
OMA 2 – SCORE	27/30	

SUMMARY COMMENTS FOR OMA 2

2A – East and West balance pond sample points reviewed. The East balancing pond is sampled from the balance pond weir into the discharge pipe. Due to warm weather vegetation was collecting around the weir point.
ACTION: A scum board should be fitted to prevent potential contamination of the sample with biological matter as per M18 guidance.

Sample storage prior to courier collection is within a fridge in the gatehouse that does not have a max/ min thermomether to ensure BOD samples are stored within the specified range for the method. The time-lag between samples beign taken and beign collected is only a few hours so the domestic fridge is likely to provide adequate cooling, however temperatures are not monitored.
ACTION: Provide a max/ min thermometer and update the relevant procedures to ensure that the temperature of the fridge is recorded in accordance with M18 guidance:
https://naturalresources.wales/media/2109/technical-guidance-note-m18-monitoring-monitoring-of-discharges-to-water-and-sewer.pdf

2C – Monitoring techniques and methods are as specified by the permit and a UKAS accredited laboratory is used.

Certificate of accreditation reviewed and in date. Socotec UKAS1252, certificate dated 24/10/2017. Consultant is used to identify suitable certified laboratory in the event that the lab is changed. Lab is accredited to ISO17025
ACTION: WX-EMS-0019 should refer specifically to the analytical methods required by the permit or agreed with NRW.

2D - Hach DR3900 photometers used for in-house process control analysis,. Analysis procedures include appropriate instructions for use of machine for in-house testing, including the blanking procedure for the photometer.

2E – Hach equipment calibrated under a site-wide contract. Calibration certificate viewed dated 09/04/2018

2F – Records of sample collection and in-house test results reviewed were complete, any additional sampling triggered by results review wasrecorded. No evidence of missing samples/ results due to sample collection or in-house analysis.

2G – In-house testing equipment is readily available to purchase online as it is non-specialist equipment, if required the same analysis could be carried out at the Kellogg plant in Manchester. The current environmental consultant could also source or provide equipment if required. No formal contract for replacement kit in place, however it is not required for external testing requirements. Couriers used to transport samples and could be booked to collect additional. No issues with current provider.

OMA 3: Continuous monitoring		
OMA ELEMENTS	**SCORE**	**COMMENTS**
A. Provisions for monitoring and location of CWMs *Critical element*	N/A	
B. Certification of CWMs	N/A	
C. Measurement methods and standards *Critical element*	N/A	
D. Calibration methods *Critical element*	N/A	
E. Frequency of maintenance and calibration	N/A	
F. Reliability of equipment (data availability)	N/A	
G. Breakdown response	N/A	
H. Traceability	N/A	
OMA 3 – SCORE	N/A	

SUMMARY COMMENTS FOR OMA 3
No continuous monitoring required by permit Discharge to sewer has a flow meter – MCERTS accredited flume, Hydroranger 200 – BS3680 rectangle flume, certificate ref:KELL/2017 dated 10/10/2017.

OMA 4: Quality assurance		
OMA ELEMENTS	**SCORE**	**COMMENTS**
A. External quality control schemes	5	Analysis required by the permit carried out by UKAS/ MCERTS accredited lab. Lab is accredited to ISO17025
B. Internal data quality control	5	Analysis required by the permit carried out by UKAS/ MCERTS accredited lab. Lab is accredited to ISO17025
C. Competence of monitoring personnel	5	There is an appropriate training matrix and records for relevant staff covering sampling procedures and in-house testing. Analysis required by the permit carried out by UKAS/ MCERTS accredited lab.
D. Auditing of monitoring	5	Internal and external audits planned and undertaken under the EMS auditing procedures. Auditors are suitably trained and independent wherever possible.
E. Audit compliance	5	Audits completed and actions assigned to named personnel and tracked.
F. Reporting	5	Site reporting is in accordance with the requirements of the permit
OMA 4 – SCORE	30/30	

SUMMARY COMMENTS FOR OMA 4

2D – EMS auditing procedures cover monitoring arrangements. Internal audits cover any external audit outcomes, incidents, reviews of procedures and observation and assessment of the personnel carrying out sampling on site. Auditors are externally trained, certificates available.

2E – Staff carrying out internal audits have appropriate levels of training and are independent of the activity wherever possible. Actions form audits are assigned tracked on the DDS system as required and are regularly reviewed to ensure completion.

ACTION: internal audit record should record the particulars of the personnel collecting samples that have been assessed so that any deficiencies identified can be tracked back to the appropriate training plan.