

OMA Report – Emissions to Air - EPR

Summary sheet		
Permit Number: VP3030BX	Compliance Officer: M.Kelk	
Operator: Befesa Salt Slags Ltd.	Auditor (if different): A.Zachary	
Emission Point(s): A1 – A6	Others Present: John Leah (JL), Stuart Irvine (SI)	
OMA Sections		SCORE
OMA 1 – Management of monitoring		88%
OMA 2 – Periodic monitoring and test laboratories		94%
OMA 3 – Continuous monitoring		N/A
OMA 4 – Quality assurance		93%
		OVERALL SCORE
		92%
OVERALL SITE ASSESSMENT COMMENTS		Letter
		Variation
		Enforcement
The operator had an OMA last in March 2011 and this report should be read in conjunction with the previous OMA report. The previous OMA showed that the operator had effective provisions for monitoring and was utilising the same MCERTS accredited contractor as they currently employ. This OMA reviewed the changes since the last assessment, and there was evidence that the operator had improved its procedures in the preceding time period. There are some minor improvements the operator could make to improve their overall score and this is reflected in the current score of 92%.		
		Date of audit: 16/03/2015
		Signed: 
		Date: 30/03/2015

OMA 1: Management of monitoring		
OMA ELEMENTS	SCORE	COMMENTS
A. Documentation of management system procedures for monitoring	5	Environmental Monitoring Procedure document for the site reviewed (Issue 13, 12/02/12), which is the core monitoring document.
B. Organisational structure for monitoring	4	Site Employs an ISO14001 accredited Env Management System. Monitoring is the named responsibility of defined staff including a deputy.
C. Schedules and planning of monitoring, including contingencies	5	Annual proposal provided by Monitoring Contractor in Dec and agreed for the following year. Procedures detail monitoring frequency as required by permit.
D. Monitoring records and use of monitoring data	4	No routine trending of quarterly results but weekly surrogates in place to monitor plant performance (acid use, pH of scrubbers etc).
E. Understanding the requirements of the permit and monitoring methods	4	JL fully conversant in permit requirements although last had training on MCERTS requirements in 2007.
OMA 1 – SCORE	22/25	
SUMMARY COMMENTS FOR OMA 1		
The operator has a core procedure “<i>Environment Monitoring Procedure</i>” that documents the management and control of monitoring at the site. This is maintained as part of the electronic management system (E74 – Site Intranet), which aids with document control. All documentation is to move to a group wide sharepoint system in the near future to help with consistency and sharing of documentation. An MCERTS accredited contractor Environmental Scientifics Group Ltd (ESG) is used to carry out sampling, with any contracted monitoring being supervised by an MCERTS Level 2 Team Leader. ESG also provide a scope and methodology as part of the works quotation. Monitoring is scheduled via an annual proposal from the contractor and reviewed at monthly and quarterly meetings. Monitoring data is not routinely trended but daily performance data of the plant is regularly reviewed. This is to be converted to an electronic tracking system to help monitor any deterioration in plant performance and as a surrogate to potential deterioration in emissions. JL has a good understanding of permit and MCERTS requirements but last received any MCERTS training in 2007, it is recommended both SI and JL receive refresher training on this aspect.		

OMA 2: Periodic monitoring and test laboratories		
OMA ELEMENTS	SCORE	COMMENTS
A. Sampling provisions <i>Critical Element</i>	4	The site has permanent monitoring platforms on 5/6 sampling points. The new scrubber platform has yet to receive kick boards and all guard rails and the Boiler stack and platform is due to be replaced this year.
B. Certification of equipment	5	UKAS and MCERTS accredited contractors utilised operating to British Standards
C. Measurement methods and standards <i>Critical element</i>	5	As above. ESG are used to conduct monitoring who are UKAS and MCERTS accredited, SRM's used for all determinants.
D. Calibration methods <i>Critical element</i>	5	UKAS/MCERTS accreditation for all the required determinants.
E. Frequency of maintenance and calibration	4	Sampling reports do not detail sample equipment calibration dates.
F. Reliability of equipment (data availability)	N/A	
G. Breakdown response	5	Spot samples from sampling ports are utilised, no in line monitoring necessary.
H. Traceability	5	Accredited test-laboratory provides for traceability to national standards, verified through UKAS assessments.
OMA 2 – SCORE	33/35	
SUMMARY COMMENTS FOR OMA 2		
Detail on H ₂ S reports from monitoring contractor has been updated as requested in the previous OMA. Recommendation to ensure any replacement monitoring provisions on the new boiler stack are compliant with the M1 guidance.		

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		

OMA 4: Quality assurance		
OMA ELEMENTS	SCORE	COMMENTS
A. External quality control schemes	5	UKAS accredited contractors and labs utilised for sampling. Befesa operate an ISO 14001 accredited management system.
B. Internal data quality control	4	Monitoring is reviewed by JL, SI and local management. No trend analysis or charting of results although weekly surrogates are used. ESG do periodic flow rate monitoring and compare to installation data.
C. Competence of monitoring personnel	5	Copies of the contractor competency certificates are provided as part of the SSP supplied.
D. Auditing of monitoring	4	Environmental Monitoring Procedure details audit scope but not frequency.
E. Audit compliance	5	An internal audit record was inspected (Feb '15). Any issues are logged with follow up actions detailed.
F. Reporting	5	Contents of monitoring report fully meets the permit requirements, monitoring reports are submitted in a timely manner.
OMA 4 – SCORE	28/30	
SUMMARY COMMENTS FOR OMA 4		
A copy of ESG's site specific protocol for monitoring (SSP) was reviewed during the audit. ESG are an MCERTS accredited contractor and utilise UKAS accredited 3rd parties for any subsequent testing. No tracking of monitoring results or trend analysis is utilised although process monitoring provides a good surrogate. Auditing of monitoring contractors is documented in procedures but has no set frequency and is done on an ad-hoc basis. Monitoring reports received from the operator are submitted on time; reports from the monitoring contractor are detailed and include calculations and uncertainty values of monitoring.		