


OMA Report – Emissions to Air - EPR

Summary sheet		
Permit Number: DP3934EW	Compliance Officer: Beth Voice	
Operator: Eni Liverpool Bay Operating Company	Auditor (if different): Aled Zachary	
Discharge point(s): A1, A2	Others Present: Dhillip Sankomar, Cath Jones, Steve Crompton, Richard Hulme	
OMA Sections		SCORE
OMA 1 – Management of monitoring		100%
OMA 2 – Periodic monitoring and test laboratories		95%
OMA 3 – Continuous monitoring		83%
OMA 4 – Quality assurance		90%
OVERALL SCORE		92%
OVERALL SITE ASSESSMENT COMMENTS		Letter
		Variation
		Enforcement
<p>The operator had an Operator Monitoring Assessment (OMA) to air in August 2010 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 although some improvement actions were listed.</p> <p>This OMA reviewed the changes since the last assessment, and there was evidence that the operator had improved various aspects of monitoring provisions including review of results, internal auditing of procedures (including that of contractors), and training of staff and monitoring procedures. These changes are reflected in the current score of 92%. Minor improvements to the sampling ports in order to characterise stack flows, audit records and breakdown response would improve this score further.</p>		
		Date of audit: 11/11/14
		Signed: 
		Date: 15/12/14

OMA 1: Management of monitoring		
OMA ELEMENTS	SCORE	COMMENTS
A. Documentation of management system procedures for monitoring	5	Eni utilise an ISO 14001 accredited management system. Documents H-000-BG-006, H-110-BG-040, H-110-BG-002 & H-110-GG-020 cover all aspects of monitoring. These documents are stored on a limited write access system called Documentum.
B. Organisational structure for monitoring	5	Well defined management structure and posts are formally identified as responsible for monitoring issues. Deputies available.
C. Schedules and planning of monitoring, including contingencies	5	Monitoring is scheduled via work cards produced on the SAP system. 6 monthly extractive samples carried out by 3 rd party contractor.
D. Monitoring records and use of monitoring data	5	Live CEMS readout in control room, results discussed at daily and monthly meetings. Chart visible in reception.
E. Understanding the requirements of the permit and monitoring methods	5	All staff spoken with on the day demonstrated a thorough understanding of permit requirements. Petrofac staff have training plans in place, which are periodically reviewed by the site manager.
OMA 1 – SCORE	25/25	
SUMMARY COMMENTS FOR OMA 1		
<p>The site changed ownership from BHP Billiton Petroleum Limited to eni Liverpool Bay Operating Company Limited on the 01/04/14. The ISO14001 accreditation passed over from BHP to eni and is in the process of being updated to eni standards. The procedures and operating instructions are dictated at a local level with the EMS (Environmental Management System) policy and management system guidelines issued at a corporate level. The 'Documentum' electronic management system is used for storage of the EMS. The EMS was audited externally in July 2014 to review the ongoing transition process.</p> <p>Documents reviewed were H-000-BG-006 (Environmental Monitoring and Measuring Procedure), H-000-BG-040 (Air Emissions Management Plan), H-110-BG-002 (POA Guide to Regulatory Environmental Reporting), H-110-GG-020 (Laboratory Standard Analytical Procedures) and H-000-BR-125 (Site Protection and Monitoring Programme).</p> <p>Document H-110-GG-020 details quarterly reporting requirements while H-110-BG-002 details out of compliance reporting requirements to Natural Resources Wales.</p>		

Monitoring results and reports are passed to the SHE Team Leader and stored on the environmental data system SHERPA.

H-000-BR-125 Section 4.5 provides an overview of training. Personnel responsible for sampling, maintenance and inspection are appropriately competent. Petrofac staff have training plans in place which are reviewed by the site manager on a 6 monthly basis are present due to the change of ownership. Further details can be found in Section 4C.

OMA 2: Periodic monitoring and test laboratories

OMA ELEMENTS	SCORE	COMMENTS
A. Sampling provisions <i>Critical Element</i>	3	Sampling platform is adequate and is inspected for integrity, although sampling ports do not allow for flow measurements or characterisation to be carried out.
B. Certification of equipment	5	ESG use MCERTS-certified systems for their reference monitoring – confirmed during UKAS audits, for MCERTS accreditation.
C. Measurement methods and standards <i>Critical element</i>	5	Standard Reference Methods (SRM) – EN 14792 used for NO _x , Alternative Method as detailed in M21 is used for SO ₂ – as detailed in latest monitoring report reviewed.
D. Calibration methods <i>Critical element</i>	5	ESG comply with the calibration methods specified by the SRM.
E. Frequency of maintenance and calibration	5	
F. Reliability of equipment (data availability)	5	Results are compared to CEMS readouts for comparison.
G. Breakdown response	5	ESG provide for complete availability, as required by MCERTS.
H. Traceability	5	Accredited test-laboratory provides for traceability to national standards, verified through UKAS assessments.
OMA 2 – SCORE	38/40	

SUMMARY COMMENTS FOR OMA 2

The report from ESG states that although the sampling platform is small it is adequate for the method of sampling carried out. However the sample port is not of sufficient size to allow any stack dimensions or flow measurements, therefore section 2A has been scored a 3.

The control room graphics showed that the CEMS have high and low level alarms for the SO₂ CEMS.

OMA 3: Continuous monitoring		
OMA ELEMENTS	SCORE	COMMENTS
A. Provisions for monitoring and location of CEMs <i>Critical Element</i>	3	The CEMS locations meet the relevant guidance requirements and the stack platforms are maintained. Flow criteria cannot be assessed due to the size of the sampling ports.
B. Certification of CEMs	3	The CEMS units are not MCERTS accredited items of equipment.
C. Calibration methods <i>Critical element</i>	5	Procedures have been amended since the previous audit to ensure calibration gases are in date.
D. Frequency of maintenance and calibration	5	Job sheets for calibration produced from the SAP system. All equipment maintained to the manufacturers' specification.
E. Reliability of equipment (data availability)	5	Valid results are produced over 98% of the available time.
F. Breakdown response	3	Electronic boards and lamps are kept on site and can be fitted by technicians. Other breakdowns would require intervention by ACMS. No formal breakdown contract in place or mobile/standby CEMS units.
G. Traceability	5	Calibration procedures are traceable to national standards.
OMA 3 – SCORE	29/35	
SUMMARY COMMENTS FOR OMA 3		
<p>3A is scored a 3 as in the periodic monitoring section as the flow measurements cannot be carried out due to the port being too small.</p> <p>3B is the highest score available for equipment which is not accredited to MCERTS.</p> <p>3F – Breakdown response is adequate and most spares are kept on site however this is not the case for all spares. There is no standby or mobile CEMS available.</p>		

OMA 4: Quality assurance		
OMA ELEMENTS	SCORE	COMMENTS
A. External quality control schemes	5	ESG are MCERTS accredited and utilise a UKAS laboratory.
B. Internal data quality control	5	ESG are MCERTS accredited and utilise a UKAS laboratory.
C. Competence of monitoring personnel	4	Site technicians have been trained by the CEMS Manufacturer (Bovar) and comprehensive training plans are in place. ESG staff are MCERTS accredited.
D. Auditing of monitoring	5	The audit plan covers monitoring requirements. An audit of ESG and their site specific protocol was carried out by CJ around 2 yrs ago.
E. Audit compliance	3	No major non compliances noted. A copy of the audit report was not available for review.
F. Reporting	5	All reporting is timely and in the format specified by the permit.
OMA 4 – SCORE	27/30	
SUMMARY COMMENTS FOR OMA 4		
<p>4C - The site technicians have been trained by the CEMS manufacturer. However they have not received any MCERTS awareness or certified training. Bovar training not on the training matrix.</p> <p>4E - ESG were audited during a site visit to ensure they complied with the site specific protocol, however no records were available for review.</p>		