OMA Report – Discharges to Water – EPR

Summary sheet	
Permit Number: DP3934EW	Compliance Officer: Beth Voice
Operator: Eni Liverpool Bay Operating Company	Auditor (if different): Aled Zachary
Discharge point(s): W1	Others Present: Dhillip Sankoomar, Cath Jones, Steve Crompton, Richard Hulme

OMA Sections		SCORE
OMA 1 – Management of monitoring		96%
OMA 2 – Periodic monitoring and test laboratories		89%
OMA 3 – Continuous monitoring		N/A
OMA 4 – Quality assurance		96%
	OVERALL SCORE	94%

OVERALL SITE ASSESSMENT COMMENTS	
	Letter
	Variation
	Enforcement

The operator had an Operator Monitoring Assessment (OMA) for water in October 2010 and this report should be read in conjunction with this previous OMA report. The previous OMA showed that the operator had effective provisions for monitoring although some improvement actions were listed.

This OMA reviewed the changes since the last assessment, and there was evidence that the operator had improved various aspects of monitoring provisions including improved management system procedures, 3rd Party validation of samples, use of SAP for prompting and logging calibration and internal auditing of lab procedures. However, it does appear that there is an issue regarding the provision of a spare pH meter for testing water quality prior to discharge in the event of normal equipment failure. These changes are reflected in the current score of 94%.

Date of audit: 11/11/14
Signed: Elizabeth Voice
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-VP-002, H-110-BG-002 & H-110-GG-020, H-000-BR-125 cover all aspects of monitoring requirements.
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. Duplicate samples taken.
D. Monitoring records and use of monitoring data	4	Water quality results stored on the J:Drive. Discussed at monthly HSE meeting, although results not routinely trended. Lab results audited by the site chemist. Environmental data stored on SHERPA.
E. Understanding the requirements of the permit and monitoring methods	5	The site chemist is mainly responsible for the water discharge. All staff spoken with on the day demonstrated a thorough understanding of permit requirements. Training plans in place.
OMA 1 – SCORE	**24/25**	

SUMMARY COMMENTS FOR OMA 1

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 on 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 externally audited in July 2014 to review the ongoing transition process.

Documents reviewed were H-000-BG-006 (Environmental Monitoring and Measuring Procedure), H-110-VP-002 (Outfall Pond Quality Management Procedure), 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).

Document H-110-GG-020 details quarterly reporting requirements while H-110-BG-002 details out of compliance reporting requirements to Natural Resources Wales.

The site carry out additional monitoring of water discharge, including quarterly analysis of the stream 10m upstream and 30 m downstream of the outfall. This additional testing is a good demonstration of commitment by the site to the environment.

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 classed as 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. The HSE Training Matrix has a 2 yearly refresher course for the Environmental Supervisor and the Environmental Engineer.

OMA 2: Periodic monitoring and test laboratories		
OMA ELEMENTS	**SCORE**	**COMMENTS**
A. Sampling provisions *Critical Element*	5	Water outfall samples taken from a sampling valve on the pumping system. Samples are taken and analysed immediately.
B. Certification of equipment	N/A	No portable monitors or auto samplers used.
C. Measurement methods and standards *Critical Element*	4	Measurements are specific to the determinants of interest. Formal review process documented in management system. Lab is not UKAS accredited.
D. Calibration methods *Critical element*	5	All equipment calibrated to manufacturers recommendations and logged on SAP.
E. Frequency of maintenance and calibration	5	Analytical grade reagents used (Fischer Scientific) all in date. Equipment required to be calibrated monthly on SAP but also carried out weekly by site chemist.
F. Reliability of equipment (data availability)	4	Equipment is reliable, not an UKAS accredited laboratory.
G. Breakdown response	3	Any breakdowns logged on SAP, spare pH probes available and backup DO Meters. No spare pH meter available in the event of the normal unit malfunctioning.
H. Traceability	5	Materials used for calibration purposes are traceable to national standards
OMA 2 – SCORE	**31/35**	

SUMMARY COMMENTS FOR OMA 2

The purpose of document eniLBOC-H-110-VP-002 is to ensure that the site has a management procedure in compliance with M18. It details the test methods used for pH as BS 6068-2.50-ISO 10523:1994 and Biological Oxygen Demand (5 day test) as BS EN 1899-1:1998-BS 6068-2.63:1998 which are as required in the permit. In addition, dissolved oxygen, general ecotoxicity (microtox) and visual oil are also tested.

Results are audited by the site chemist and out of spec sample results are forwarded to the operations supervisor.

The pH buffer solution was dated 07/01/14 and to be used within 2 years.
Laboratory monitoring equipment was labelled with an asset number which ties into the SAP system.

Recommendation: It would be beneficial to have a spare pH meter for testing water quality prior to discharge in the event of normal equipment failure.

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		
SUMMARY COMMENTS FOR OMA 3		
No continuous monitoring of discharge to water.		

OMA 4: Quality assurance		
OMA ELEMENTS	**SCORE**	**COMMENTS**
A. External quality control schemes	5	Lab results are verified by a UKAS accredited 3rd party lab on a 6 monthly basis.
B. Internal data quality control	N/A	
C. Competence of monitoring personnel	5	Site chemist is appropriately trained with 20yrs+ experience, training plans in place.
D. Auditing of monitoring	5	Audit plan covers monitoring, 4 monthly audits of lab by site chemist prompted by SAP. Copy of audit report viewed during audit.
E. Audit compliance	5	No major non compliances noted. Any issues tracked on internal action tracking system, reviewed fortnightly.
F. Reporting	5	All reporting timely and in the format specified by the permit.
OMA 4 – SCORE	**24/25**	

SUMMARY COMMENTS FOR OMA 4

Third party contractors ALS Environmental are used to verify internal laboratory results on a 6 monthly basis. Certificates of analysis for pH, conductivity, DO and BOD were viewed for 22/10/14 and 14/08/14. The BOD analysis for October was not carried out within recommended stability times therefore it is possible that the results may not be accurate. It is recommended that site ensures that the sample is analysed within the required timeframe.

The 'water discharge laboratory check sheets' were reviewed for 2014 and all were present and signed off as required.