

OMA Report – Emissions to Air - EPR

Summary sheet		
Permit Number: PP3834CB	Compliance Officer: Beth Voice	
Operator: Morgan Technical Ceramics Ltd	Auditor (if different): Alison Soper (NRW)	
Emission Point(s): B6, B7, B24	Others Present: Kathleen Coward, Timothy Lunt	
OMA Sections	SCORE	
OMA 1 – Management of monitoring	60%	
OMA 2 – Periodic monitoring and test laboratories	95%	
OMA 3 – Continuous monitoring	N/A	
OMA 4 – Quality assurance	80%	
	OVERALL SCORE	78%
OVERALL SITE ASSESSMENT COMMENTS		Letter
		Variation
		Enforcement
The operator had an Operator Monitoring Assessment (OMA) to air in December 2009 and this report should be read in conjunction with the previous OMA report. MEC use Environmental Evaluation Ltd to carry out periodic air monitoring for the site, which has an MCERTS accredited test laboratory with a valid scope of accreditation for the required determinands. The reports provided to MEC by the contractor are comprehensive. Samples which were invalid or not able to be taken were rescheduled. The main issues highlighted in the OMA was the lack of detail within the site procedures regarding monitoring requirements, with several breaches of the emission limit values not reported to Natural Resources Wales. Monitoring should be a regular item on the internal auditing plan.		
		Date of audit 08/12/14
		Signed: E Voice
		Date: 27/02/15

OMA 1: Management of monitoring		
OMA ELEMENTS	SCORE	COMMENTS
A. Documentation of management system procedures for monitoring	3	The operator utilise an ISO 14001 accredited management system. Documents EMP/13 (EMS Procedure Environmental Duties of Personnel) and EMP/14 (EMS Procedure Natural Resources Wales EPR 2010 Permit Operation) were reviewed. There is a lack of details on monitoring of emissions to air. Responsibilities should specifically include the sampling requirements. A method statement is available prior to work starting.
B. Organisational structure for monitoring	3	A site organogram details job titles and named individuals. However specific sampling responsibilities are not written into the procedures.
C. Schedules and planning of monitoring, including contingencies	5	Monitoring is scheduled via the Maintenance PM programme. Invalid samples are rescheduled. Environmental Evaluation Ltd are repeatedly used as the monitoring contractor, therefore personnel and procedures are known. Contract is set up annually for the contractor to monitor bi-annually.
D. Monitoring records and use of monitoring data	2	Procedures are in place for review pf monitoring results. However these were not followed in the case of breaches to air and the requirement to report to NRW within 24 hours of detection. In addition, the maximum measured concentration was not always used on the annual reporting form.
E. Understanding the requirements of the permit and monitoring methods	2	Monitoring is being carried out to the required standards, but breaches and not reported as required.
OMA 1 – SCORE	15/25	
SUMMARY COMMENTS FOR OMA 1		
Requirements 1. The EMS needs to include more details as to monitoring requirements and responsibilities. 2. Site management need to ensure that procedures which are in place for reporting		

breaches of permit emission values are followed. It was noted that there were 7 breaches of the emission limit values which were not reported within 24 hours of detection. 5 breaches were not reported at all.

OMA 2: Periodic monitoring and test laboratories		
OMA ELEMENTS	SCORE	COMMENTS
A. Sampling provisions <i>Critical Element</i>	3	One platform is fully compliant with TGN M1; the other two are partially compliant but the quality of monitoring is not compromised significantly.
B. Certification of equipment	5	Periodic monitoring is carried out by an MCERTS accredited test laboratory with a valid scope of accreditation.
C. Measurement methods and standards <i>Critical element</i>	5	Test laboratory has accreditation for the regulated determinands. BSEN 13284:2002 and BSEN 1485:2004 for metals
D. Calibration methods <i>Critical element</i>	5	Environmental Evaluation complies with the calibration methods specified by the Standard Reference Methods.
E. Frequency of maintenance and calibration	5	Environmental Evaluation complies with the calibration methods specified by the Standard Reference Methods.
F. Reliability of equipment (data availability)	5	Spot samples therefore equipment available.
G. Breakdown response	5	Environmental Evaluation 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		

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		
SUMMARY COMMENTS FOR OMA 3		
No continuous monitoring for emissions to air.		

OMA 4: Quality assurance		
OMA ELEMENTS	SCORE	COMMENTS
A. External quality control schemes	5	Environmental Evaluation Ltd are accredited to ISO 17025 for its testing activities and to MCERTS performance standards.
B. Internal data quality control	5	Results are reviewed and abnormal results are flagged.
C. Competence of monitoring personnel	5	Monitoring personnel are MCERTS accredited and therefore have appropriate level of training, qualifications and experience. Certificates of Personnel Competence are attached to the sample reports.
D. Auditing of monitoring	3	Operator is audited by Jacobs for ISO 14001. Monitoring specifics have not been included but this has been highlighted. Some monitoring auditing was carried out July 2014.
E. Audit compliance	4	Audit actions and records from Jabcobs external auditor are reviewed at the Senior Management Team Meeting. Updates of actions are reported and tracked by Jacobs. The EHS Manager is responsible for audit compliance.
F. Reporting	2	The content of the report of monitoring results from Environmental Evaluation Ltd is good. The annual report for 2014 was reported in a timely manner. The maximum concentrations were not always used. Part A reports for breaches of the emission limit values were not reported.
OMA 4 – SCORE	24/30	
SUMMARY COMMENTS FOR OMA 4		
Requirements - Permit section 4.3.1 (b) requires that NRW is notified within 24 hours following the detection of a breach of a limit specified in the permit. - The operator should audit the monitoring company to ensure they are following		

procedures.

- Monitoring should be a regular item on the internal auditing plan.
- The operator needs to ensure that the maximum concentration recorded is used for reporting purposes.