

Summary sheet

Permit Number: PP3834CB	Compliance Officer: Beth Voice	
Operator: Morgan Technical Ceramics Ltd	Auditor (if different): Alison Soper	
Emission Point(s): S1	Others Present: Kathleen Coward, Timothy Lunt	
OMA Sections	SCORE	
OMA 1 – Management of monitoring	56%	
OMA 2 – Periodic monitoring and test laboratories	23%	
OMA 3 – Continuous monitoring	N/A	
OMA 4 – Quality assurance	44%	
	OVERALL SCORE	41%
OVERALL SITE ASSESSMENT COMMENTS	Letter	
	Variation	
	Enforcement	
<p>This is the first Operator Monitoring Assessment for discharges to sewer for the site. The score of 41% is very low. Much of the information was not known to the operator, and this demonstrates a lack of understanding of the monitoring requirements of the permit.</p> <p>Welsh Water carries out monthly sewer discharge monitoring for the purpose of Trade Effluent Consent compliance. The lead and zinc results are used by the operator for compliance with its NRW permit. However the site needs to ensure that the methods and procedures being used by Welsh Water satisfy the NRW permit requirements. Since the OMA the operator has started dialogue with Welsh Water as to what analysis is already being carried out and to what standard. Once this is ascertained then the score may increase significantly. However, at the time of the OMA the operator did not know this information therefore this low score remains. The operator must understand monitoring requirements even if a contractor carries out all of the monitoring.</p> <p>In addition, there was the lack of detail within the site procedures regarding monitoring requirements, with three breaches of the emission limit values not reported to Natural Resources Wales. Monitoring should be a regular item on the internal auditing plan.</p>		
	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 water. Responsibilities should specifically include the sampling requirements.
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 carried out monthly by Welsh Water. A spot sample is required to be taken 6 monthly therefore this frequency of sampling is good.
D. Monitoring records and use of monitoring data	2	Procedures are in place for review pf monitoring results. However these were not followed with the requirement to report to NRW within 24 hours of detection. There have been 4 breaches to sewer for 2014, only one of which was reported (Nov 2014).
E. Understanding the requirements of the permit and monitoring methods	1	The operator must understand monitoring requirements even if a contractor carries out all of the monitoring. The operator was unable to demonstrate that the monitoring requirements were implemented for discharge to sewer.
OMA 1 – SCORE	14/25	
SUMMARY COMMENTS FOR OMA 1		
<ol style="list-style-type: none"> 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. 		

OMA 2: Periodic monitoring and test laboratories		
OMA ELEMENTS	SCORE	COMMENTS
A. Sampling provisions <i>Critical Element</i>	2	The sampling point appears to be suitable, however there is no evidence to demonstrate that it meets M18 requirement.
B. Certification of equipment	N/A	
C. Measurement methods and standards <i>Critical Element</i>	1	Operator cannot provide documentary evidence that this element is being met.
D. Calibration methods <i>Critical element</i>	1	Operator cannot provide documentary evidence that this element is being met.
E. Frequency of maintenance and calibration	1	Operator cannot provide documentary evidence that this element is being met.
F. Reliability of equipment (data availability)	1	Operator cannot provide documentary evidence that this element is being met.
G. Breakdown response	1	Operator cannot provide documentary evidence that this element is being met.
H. Traceability	1	Operator cannot provide documentary evidence that this element is being met.
OMA 2 – SCORE	8/35	
SUMMARY COMMENTS FOR OMA 2		
<p>The operator has started dialogue with Welsh Water as to what analysis is carried out and to what standard. However, at the time of the OMA the operator did not know whether the monitoring and analysis was being carried out to required standard.</p> <p>Recommendation</p> <ul style="list-style-type: none"> The operator needs to ensure that Section 3.3 of the permit is met. An UKAS approved method must be used for the determinands. Monitoring equipment, techniques, personnel and organisations employed for the emissions monitoring programme shall have either MCERTS verification / accreditation. 		

OMA 3: Continuous monitoring		
OMA ELEMENTS	SCORE	COMMENTS
A. Provisions for monitoring and location of CWMs <i>Critical element</i>	N/A	
B. Certification of CWMs	N/A	
C. Measurement methods and standards <i>Critical element</i>	N/A	
D. Calibration methods <i>Critical element</i>	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 for emissions to sewer.		

OMA 4: Quality assurance		
OMA ELEMENTS	SCORE	COMMENTS
A. External quality control schemes	1	Operator cannot provide documentary evidence that this element is being met.
B. Internal data quality control	1	Operator cannot provide documentary evidence that this element is being met.
C. Competence of monitoring personnel	3	Laboratory used in UKAS accredited, however we do not know which specific procedure is being used therefore cannot be sure that it is suitable for the determinand.
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 Jacobs 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	1	There were 4 breaches of the elv during 2014 and only one reported. Part A reports for breaches of the emission limit values were not submitted. S1 for lead for Jan-Jun 2014 was reported at 0.5mg/l, however the maximum value was 1.1mg/l therefore this should have been used.
OMA 4 – SCORE	13/30	
SUMMARY COMMENTS FOR OMA 4		
<ul style="list-style-type: none"> 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. 		