


Summary sheet

Permit Number: AP3337HF	Compliance Officer: Jamie Blythin	
Operator: 2 Agriculture Ltd- Llay feed Mill	Auditor (if different):	
Emission Point(s): A12,A14,A15 & A16	Others Present:	
OMA Sections	SCORE	
OMA 1 – Management of monitoring	10/25- 40%	
OMA 2 – Periodic monitoring and test laboratories	38/40- 95%	
OMA 3 – Continuous monitoring	N/A	
OMA 4 – Quality assurance	20/30- 67%	
	OVERALL SCORE	68/95-71%
OVERALL SITE ASSESSMENT COMMENTS	Letter	
	Variation	
	Enforcement	
<p>This was a desk-based Operator Monitoring Assessment (OMA) audit to air carried out after reviewing documentation provided by the operator.</p> <p>All air emissions monitoring is completed by suitably qualified MCERTS accredited contractors.</p> <p>There were some areas for improvement identified -see ACTIONS1-7 in the report.</p>		
	Date of audit: 06.06.22	
	Signed:	
		
	Date: 19.07.22	

OMA 1: Management of monitoring		
OMA ELEMENTS	SCORE	COMMENTS
A. Documentation of management system procedures for monitoring	2	<p>Operator has provided a copy of the Environmental Management System (EMS) February 2022. EMS refers to the requirement for emissions monitoring (p27) but does not provide any detail of monitoring procedures.</p> <p>Emissions monitoring is carried out by external contractors (MCERTS accredited)</p> <p>Site Specific Protocol (SSP) provided – Jan 2022. However, there are no written procedures in place which explain who is responsible for reviewing the SSP to ensure that emissions monitoring meets permit requirements.</p>
B. Organisational structure for monitoring	2	<p>Company organogram provided. EMS briefly outlines site environmental responsibilities including emission monitoring requirements (p12).</p> <p>No role profile provided for Quality Health, Safety and Environmental (QHSE) Co-Ordinator.</p> <p>Monitoring carried out by external contractors.</p>
C. Schedules and planning of monitoring, including contingencies	2	<p>Copy of emissions monitoring scheduling spreadsheet provided (Jan 2022). Basic information contained. This does not reference specific monitoring points.</p> <p>No evidence provided to show emissions monitoring was scheduled/ tracked before Jan 2022.</p> <p>No contract or written procedure in place for hiring external contractors to complete emissions monitoring.</p>

<p>D. Monitoring records and use of monitoring data</p>	<p>2</p>	<p>Emissions monitoring reports provided (2018-2022).</p> <p>Emissions monitoring reports reviewed by QHSE Co-Ordinator. However, there are no formal procedures in place relating to review of these reports.</p> <p>Emissions monitoring data has been used to produce graphs to show trends. However, there are no formal procedures in place relating to review of this monitoring data.</p> <p>It is unclear what analysis has taken place and how any permit non-compliances are tracked e.g. Emission Limit Value (ELV) breaches.</p> <p>No evidence to show emissions monitoring results and compliance with permitted ELVs are a standing item on the agenda of relevant management meetings.</p>
<p>E. Understanding the requirements of the permit and monitoring methods</p>	<p>2</p>	<p>The operator has demonstrated basic knowledge of the requirements of the permit and monitoring methods.</p> <p>List of Environmental Training set out in EMS. However, this does not include awareness of emissions monitoring, OMA or MCERTS.</p> <p>Emissions monitoring has been completed by external contractors (MCERTS accredited)-emissions monitoring reports provided.</p> <p>Although annual emissions monitoring results have been provided to NRW, some of these (2020, 2021) were submitted after the permitted deadline. This was caused by late booking of external contractors.</p> <p>Copies of the Environmental Risk Assessment (ERA 2021) and Fugitive Emissions Review (2021) have been provided.</p>

OMA 1 – SCORE	10
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SUMMARY COMMENTS FOR OMA 1

1A- Copy of Environmental Management System (EMS) provided but more detail is required in relation to the procedures for air emissions monitoring e.g. details of procedure for booking suitably qualified external contractors to carry out emissions monitoring, process for reviewing SSP

ACTION 1- Update EMS/ Site Operating Procedures (SOPs) to explain, in more detail, the procedures for air emissions monitoring e.g. details of procedure for booking suitably qualified external contractors to carry out emissions monitoring, process for reviewing SSP

1B- Company organogram provided. EMS briefly outlines site environmental responsibilities including emission monitoring requirements (p12). However, there is no role profile provided for Quality Health, Safety and Environmental (QHSE) Co-Ordinator.

ACTION 2- Update EMS/SOPs to include role profile/ responsibilities of QHSE Co-Ordinator.

1C- Copy of emissions monitoring scheduling spreadsheet provided (Jan 2022). Basic information contained. This does not reference specific monitoring points. No evidence provided to show emissions monitoring was scheduled/ tracked before Jan 2022.

It is not clear which members of staff have access to the emissions monitoring scheduling spreadsheet, who is responsible for booking suitably qualified external contractors to complete the monitoring or what tracking system is in place to notify senior management if monitoring does not take place.

ACTION 3- EMS/ SOPs need to be updated to address the following: the emissions monitoring scheduling spreadsheet needs to reference specific monitoring points, clarify which members of staff have access to the emissions monitoring scheduling spreadsheet, explain who is responsible for booking suitably qualified external contractors to complete the monitoring and explain what tracking system is in place to notify senior management if monitoring does not take place.

Annual returns to NRW for the last 2 years have been late due to a delay caused by late booking of contractors. These late returns have attracted non-compliance scores.

1D- Emissions monitoring reports reviewed by QHSE Co-Ordinator. However, there are no formal procedures in place relating to review of these reports.

Emissions monitoring data has been used to produce graphs to show trends. However, there are no formal procedures in place relating to review of this monitoring data or to explain where this data is logged.

It is unclear what analysis has taken place and how any permit non-compliances are tracked e.g. Emission Limit Value (ELV) breaches.

ACTION 4- EMS/ SOPs need to be updated to address the following: explain procedure for reviewing emissions monitoring data reports, logging results and analysing trends. Explain how any permit non-compliances are tracked.

1E- Emissions monitoring has been completed by suitably qualified external contractors (MCERTS accredited)- emissions monitoring reports provided.

Although annual emissions monitoring results have been provided to NRW, some of these (2020, 2021) were submitted after the permitted deadline. This was caused by late booking of external contractors. See ACTION 3

A list of Environmental Training is set out in the EMS. However, this does not include awareness of emissions monitoring, OMA or MCERTS. It would be useful for relevant staff e.g. QHSE Co-Ordinator, to complete this training.

OMA 2: Periodic monitoring and test laboratories		
OMA ELEMENTS	SCORE	COMMENTS
A. Sampling provisions	3	<p>Overall, sampling provisions are adequate. However, the SSP (Jan 2022) highlighted all sampling platforms show some deviations from the Environment Agency's Technical Guidance Note M1 and EN15259.</p> <p>The operator should review the improvement recommendations given in the SSP (Jan 2022) and instigate a programme of improvements where required.</p> <p>NRW have not been to site to check platforms</p>
B. Certification of equipment	5	MCERTs accredited contractor carries out monitoring using certified instruments
C. Measurement methods and standards	5	External contractor has MCERTs accreditation for the relevant parameters and methods.
D. Calibration methods	5	MCERTs accredited contractor used
E. Frequency of maintenance and calibration	5	UKAS and MCERTS methods employed
F. Reliability of methods and equipment (data availability)	5	MCERTs accredited contractor used
G. Breakdown response	5	<p>MCERTs accredited contractor used. Equipment failures/ spares would be resolved by the contractor.</p> <p>No specific breakdown response documented by the operator.</p>
H. Traceability	5	UKAS and MCERTS methods employed by external contractor.

OMA 2 – SCORE	38	
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SUMMARY COMMENTS FOR OMA 2

2A- Overall, sampling provisions are adequate. However, the SSP (Jan 2022) highlighted all sampling platforms show some deviations from the Environment Agency’s Technical Guidance Note M1 and EN15259. NRW have not been to site to check platforms

ACTION 5- The operator should review the improvement recommendations given in the SSP (Jan 2022) and instigate a programme of improvements where required.

2B- MCERTs accredited contractor carries out monitoring using certified instruments

2C- External contractor has MCERTs accreditation for the relevant parameters and methods.

2D- MCERTs accredited contractor used

2E- UKAS and MCERTS methods employed

2F- MCERTs accredited contractor used

2G- MCERTs accredited contractor used. Equipment failures/ spares would be resolved by the contractor.

No specific breakdown response documented by the operator.

2H- UKAS and MCERTS methods employed by external contractor.

OMA 3: Continuous monitoring		
OMA ELEMENTS	SCORE	COMMENTS
A. Provisions for monitoring and location of continuous monitors		
B. Certification of continuous monitoring		
C. Do not assess for air, water only	N/A	N/A
D. Calibration methods		
E. Frequency of maintenance and calibration		
F. Reliability of equipment (data availability)		
G. Breakdown response		
H. Traceability		
OMA 3 – SCORE	N/A	
SUMMARY COMMENTS FOR OMA 3		
N/A		

OMA 4: Quality assurance		
OMA ELEMENTS	SCORE	COMMENTS
A. External quality control schemes	5	MCERTs accredited contractor used
B. Internal data QC	5	MCERTs accredited contractor used
C. Competence of monitoring personnel	5	MCERTs accredited contractor used
D. Auditing of monitoring	1	No formal Auditing in place; wholesale review of auditing processes planned by operator.
E. Audit compliance	1	No formal Auditing in place; wholesale review of auditing processes planned by operator.
F. Reporting	3	Monitoring reports meet permit requirements but there have been several late submissions to NRW (2020,2021) due to delays with booking external MCERTS accredited contractors to carry out monitoring.
OMA 4 – SCORE	20	

SUMMARY COMMENTS FOR OMA 4

4A- MCERTs accredited contractor used

4B- MCERTs accredited contractor used

4C- MCERTs accredited contractor used

4D- No formal auditing and tracking system in place.

ACTION 6- The operator needs to implement suitable auditing procedures linked to the EMS to ensure:

- Personnel carrying out analysis/sampling do so in accordance with documented procedures
- Personnel carrying out monitoring do so in accordance with the SSP
- Monitoring and analytical reports provide sufficient detail to allow an audit trail back to the on-site measurement and process plant operating conditions

4E- No formal auditing and tracking system in place. This aspect complements 4D.

ACTION 7- The operator needs to implement suitable tracking procedures to provide assurances that the audit programme is being undertaken and that any procedural non-compliances are followed up and corrective actions put in place.

Roles and responsibilities of relevant members of staff tasked with carrying out the audits and tracking actions needs to be defined.

4F- Monitoring reports meet permit requirements but there have been several late submissions to NRW (2020,2021) due to delays with booking external MCERTS accredited contractors to carry out monitoring. See ACTION 3.