OMA Report – Emissions to Air – EPR

Summary sheet		
Permit Number: BV8016ID	Compliance Officer: Jamie Blythin	
Operator: Kellogg Company of Great Britain Ltd	Auditor (if different):	
Emission Point(s): A1-A4, A18-22 and A26-31	Others Present:	

OMA Sections		SCORE
OMA 1 – Management of monitoring		19/25- 76%
OMA 2 – Periodic monitoring and test laboratories		12/20- 60%
OMA 3 – Continuous monitoring		N/A
OMA 4 – Quality assurance		13/15- 86%
	OVERALL SCORE	73%

OVERALL SITE ASSESSMENT COMMENTS	Letter
	Variation
	Enforcement

This was a desk-based Operator Monitoring Assessment (OMA) audit carried out after reviewing documentation provided by the operator.

This was a part OMA audit and we have not assessed all aspects as the monitoring requirements changed following the permit variation issued 14.02.22. The permit variation requires that monitoring of the following emission points: A1-A4 (steam raising boilers) and A18-22(Nutrigrain/Granola ovens) are now carried out in accordance with BSEN14792. Historically, these emission points have been monitored by staff internally using procedures which were verbally agreed with Natural Resources Wales. It should be noted that these members of staff are not accredited to MCERTS.

Following the permit variation (14.02.22), the operator will need to ensure that monitoring of emission points A1-A4 and A18-22, going forward, are completed in accordance with BSEN14792 by staff with MCERTS accreditation.

Emissions monitoring for emission points A26-31 is completed by suitably qualified MCERTS accredited external contractors.

Overall air emissions monitoring is well managed with some improvements identified related to the new monitoring requirements following the permit variation.

	Date of audit: 06.06.22
	Signed:
	Date: 19.07.22

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Cyfoeth Naturiol Cymru
Natural Resources Wales

OMA 1: Management of monitoring		
OMA ELEMENTS	**SCORE**	**COMMENTS**
A. Documentation of management system procedures for monitoring	3	Comprehensive Environmental Management System in place. Internal monitoring procedures provided for emission points in boiler house and Nutrigrain/ Granola ovens. Calibration certificates provided for flu gas analysers. Copies of completed Site Specific Protocol (SSP) forms provided. Air emissions monitoring for emission points A26-31 is carried out by external contractors with MCERTs accreditation. Air emissions monitoring for emission points A1-4 (steam raising boilers) and A18-22 (Nutrigrain/ Granola ovens) is carried out internally by staff. Site procedures will need to be updated to reflect new monitoring requirements following issue of the permit variation on 14.02.22 – Monitoring of A1-A4 (steam raising boilers) and A18-22 (Granola/ Nutrigrain ovens) needs to be carried out in accordance with BSEN14792.
B. Organisational structure for monitoring	3	Inhouse Air emissions organisational chart (updated November 2021) provided. Roles and responsibilities outlined in monitoring procedures documents. Adequate resources for provision of a deputy.

C. Schedules and planning of monitoring, including contingencies	5	Schedule for monitoring of emissions requirements (Doc ID- WX-EMS-0035-EREF) Environmental permitting monitoring of emissions requirements (Doc Id-WX-EMS-0034-EREF-Revisoon 5) Summary of reporting requirements to NRW (Doc Id-WX-EMS-0037-EREF)
D. Monitoring records and use of monitoring data	4	Internal audit procedures (WX-EMS-0011-EMP). Monitoring results and internal monitoring procedures reviewed during internal audits. Although monitoring data from emission points A1-4 (steam raising boilers) and A18-22 (Nutrigrain/ Granola ovens) is reviewed, it should be noted that there are no permitted Emission Limit Values (ELVs) associated with these. Data from emission points A26-31 is reviewed and input into internal data tracking system.
E. Understanding the requirements of the permit and monitoring methods	4	Training records Good understanding of permit and potential environmental impacts Understanding of impact of emissions on the environment- Plant air and dust emission control document
OMA 1 – SCORE	19	

SUMMARY COMMENTS FOR OMA 1
1A)There is a comprehensive EMS in place which is subject to internal audits. This EMS is not currently accredited to an international standard.

Internal monitoring procedures for emission points on steam raising boilers (A1-4) (WX-EMS-0051-EREF Revision 3) and Nutrigrain /Granola ovens (A18-22) (WX-EMS-0052-EREF Revision 3) have been provided.

External contractors (MCERTS accredited) are employed to carry out emissions monitoring on emission points A26-31.

On 14.02.22 a permit variation was issued incorporating changes from the statutory sector review following the publication of the revised Best Available Techniques (BAT) Reference Document (BRef) for the Food, Drink and Milk Industries and the operator initiated variation.

This variation included the addition of 2 new emission points to air on the main process roof (A30 and A31).A wet dust abatement system to replace the 'Bran Flakes Bleed Dryer D4686', with its own new emission point (A30), has been included. Three emission points from existing cyclones on the process (numbered 33, 34 and 37) now link into a dry dust cartridge abatement system, with a single emission point (A31) in the environmental permit, by way of this variation.

As stated previously, the permit variation requires that monitoring of the following emission points: A1-A4 (steam raising boilers) and A18-22 (Granola ovens) are now carried out in accordance with BSEN14792. Historically, these emission points have been monitored by staff internally using procedures which were verbally agreed with Natural Resources Wales. It should be noted that the members of staff carrying out the monitoring are not accredited to MCERTS.

ACTION 1- Following the permit variation (14.02.22), the operator will need to ensure that monitoring of emission points A1-A4 and A18-22, going forward, are completed in accordance with BSEN14792 by staff with MCERTS accreditation.

1B) Roles and responsibilities for monitoring carried out by internal staff are outlined in internal monitoring procedure documents.

An inhouse air emissions organisational chart (updated November 2021) has been provided.

Recommendation- It would be useful to have a single document which outlines staff roles & responsibilities for air emissions monitoring including management of contractors used in air emissions monitoring, e.g who is responsible for booking contractors, reviewing SSPs, reviewing emissions reports.

1C- Comprehensive scheduling and tracking system for carrying out emissions monitoring

1D)- Monitoring records and data for all emission points are reviewed.

1E) Good understanding of permit requirements, monitoring requirements and potential impacts from the site. Training plans and records for relevant members of staff shared with NRW.

Competency of external contractors assessed- MCERTS level 2 (emission points A26-31).

Staff responsible for carrying out internal monitoring (emission points A1-4 & A18-22) have completed relevant training (Boiler Operative Accreditation Scheme) but following the issue of the permit variation on 14.02.22, monitoring will need to be completed in line with new permit requirements BSEN14792. The operator will need to ensure that internal staff complete the

relevant training to meet the new permit requirements or hire suitably qualified external contractors to carry out this monitoring.

OMA 2: Periodic monitoring and test laboratories		
OMA ELEMENTS	**SCORE**	**COMMENTS**
A. Sampling provisions	N/A	Location of sampling points, planes and ports are suitable and safe. Sampling provisions for emission points A26-31 are ok as logged in SSSPs. Other emission points not assessed NRW has not inspected any emission points.
B. Certification of equipment	3	MCERTs contractor carries out monitoring using MCERTS certified instruments (emission points A26-31). Monitoring for steam raising boilers (emission points A1-4) and Nutrigrain/ Granola ovens (emission points A18-22) is carried out internally by staff using Kane May 9106 flue gas analysers. These units are calibrated annually by Kane International Ltd. Examples of calibration certificates provided. However, there is no evidence to prove that these are MCERTS certified.
C. Measurement methods and standards	3	Contractor has MCERTs accreditation for the relevant parameters and methods (emission points A26-31). Monitoring for steam raising boilers (emission points A1-4) and Nutrigrain/ Granola ovens (emission points A18-22) is carried out internally by staff.

D. Calibration methods	3	MCERTs accredited contractor used. (emission points A26-31). Monitoring for steam raising boilers (emission points A1-4) and Nutrigrain/ Granola ovens (emission points A18-22) is carried out internally by staff using Kane May 9106 flue gas analysers. These units are calibrated annually by Kane International Ltd. Examples of calibration certificates provided.
E. Frequency of maintenance and calibration	3	Internal Planned Preventative Maintenance (PPM) scheduling system. Demonstration of this system given to NRW staff. Internal monitoring equipment (Kane May 9106 flue gas analysers) calibrated annually. Monitoring equipment used by external contractors carried out under MCERTS accreditation.
F. Reliability of methods and equipment (data availability)	N/A	
G. Breakdown response	N/A	
H. Traceability	N/A	
OMA 2 – SCORE	12	
SUMMARY COMMENTS FOR OMA 2		
2A- This aspect has not been assessed. The SSPs did not highlight any issues with monitoring platforms (A26-31), although it should be noted that NRW have not assessed these on site. 2B- MCERTs contractor carries out monitoring using MCERTS certified instruments (emission points A26-31).		

Monitoring for steam raising boilers (emission points A1-4) and Nutrigrain/ Granola ovens (emission points A18-22) is carried out internally by staff using Kane May 9106 flue gas analysers. These units are calibrated annually by Kane International Ltd. Examples of calibration certificates provided. However, there is no evidence to prove that these are MCERTS certified. For a higher score on this aspect, the operator would need to prove MCERTS certification.

2C- Same as 2B

2D- Same as 2B

2E- Internal PPM schedule.

The facility management team carry out walking tours of the roof area and report any issues to relevant personnel in line with the Roof Monitoring Procedure.

Any abnormalities are recorded in the Kellogg's online reporting tool and investigated by the EHS Team

Air emissions points are inspected through monthly environmental inspections and more in depth/ less frequent 'golden six walk rounds.'

2F- Not assessed

2G-Not assessed

2H- Not assessed

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	N/A	Particulate monitoring is completed by external contractors (MCERTS accredited)
B. Internal data QC	N/A	Particulate monitoring is completed by external contractors (MCERTS accredited)
C. Competence of monitoring personnel	N/A	
D. Auditing of monitoring	3	Internal environmental audits carried out regularly (WX-EMS-001-EMP-Environmental Internal Auditing Procedure) key staff are trained internally to undertake audits. Different levels of internal audit- local/ global. Examples of internal audit reports provided. Examples of auditing in house monitoring activities. SSPs reviewed and agreed. No reference to auditing of external contractors.
E. Audit compliance	5	If issues are identified following an audit the Environmental Co-ordinator will then put the corrective action into the Environmental Corrective Action Register Corrective actions from audit reports are tracked via internal system. If completion dates for corrective actions are missed, these are escalated automatically to senior management.

F. Reporting	5	Monitoring reports meet permit requirements and are submitted on time
OMA 4 – SCORE	13	

SUMMARY COMMENTS FOR OMA 4
4A- Not assessed 4B- Not assessed 4C- Not assessed 4D- Internal environmental audits carried out regularly (WX-EMS-001-EMP-Environmental Internal Auditing Procedure). Relevant staff are trained internally to undertake audits and independent of the activity being audited. Recommendation- To achieve a higher score on this aspect, we would need to see evidence that auditing of the monitoring completed by external contractors has taken place. 4E- Comprehensive audit and tracking system in place. 4F- Monitoring reports meet permit requirements and are submitted on time