


## Summary sheet

Permit Number: AB3591ZQ	Compliance Officer: Phil Harper	
Operator: Maelor Poultry	Auditor (if different):	
Discharge point(s): W1, W2, W3	Others Present: Lara Cubley	
OMA Sections	SCORE	
OMA 1 – Management of monitoring	14 (56%)	
OMA 2 – Periodic monitoring and test laboratories	35 (87 %)	
OMA 3 – Continuous monitoring	22 (55 %)	
OMA 4 – Quality assurance	12 (40 %)	
	OVERALL SCORE	69 %
OVERALL SITE ASSESSMENT COMMENTS	Letter	
	Variation	
	Enforcement	
<p>The audit found that overall, the monitoring provisions that are in place at the site are in line with the requirements of the permit, however, non-compliances have been applied regarding the pH meter and visual checking of W2 and W3.</p> <p>An actions log arising from the OMA audit which was undertaken at the site in 2018 has been submitted to the site prior to the audit. Evidence provided during the audit shows that some of the actions have been completed. However, the actions log does not provide evidence that actions have been completed.</p> <p>There is opportunity for significant improvement upon the score of 69 % and to ensure future compliance by undertaking the actions and recommendations which are detailed in this OMA report and the OMA report from 2018.</p> <p>This report should be read in conjunction with CAR_NRW0040800.</p>		
	Date of audit: 22/11/2022	
	Signed: 	
	Date: 23/12/2022	

OMA 1: Management of monitoring		
OMA ELEMENTS	SCORE	COMMENTS
A. Documentation of management system procedures for monitoring	3	For W1 Standard Operating procedure SOP7.2.28.2 provides a site-specific plan for in house testing. Procedure EMS 9.1.1.4EMP discusses the process for collecting and handling composite samples for third party analysis. The sites environmental management system is not third party certified. Procedures for emissions points W2 and W3 were not evidenced. Standard operating procedures did not discuss how external analysis companies were select.
B. Organisational structure for monitoring	3	Documentation shows roles and responsibilities in relation to environmental monitoring. Critical site staff, specifically staff with responsibility for arranging off site analysis were missing from the documentation. No deputisation was provided by the documentation.
C. Schedules and planning of monitoring, including contingencies	3	EMS9.1.1.4EMP provides information regarding the scheduling and planning of monitoring. No schedules available for the calibration and maintenance of continuous flow pH meter which is required by the permit.
D. Monitoring records and use of monitoring data	3	Data stored but not manipulated. All in house testing and continuous monitoring readings can be viewed easily by relevant staff. Continuos flow pH meter is not calibrated and shows a reading which is not representative.
E. Understanding the requirements of the permit and monitoring methods	1	The pH meter is not calibrated and shows a reading which is not representative. Emissions points W2 and W3 are not being inspected weekly as required by the permit.
<b>OMA 1 – SCORE</b>	14 (56%)	
SUMMARY COMMENTS FOR OMA 1		
Document EMS9.1.1.4EMP states that 1 litre of the daily composite should be removed for daily in house analysis. Through conversation with site operatives, it was clear that contrary to the management system a spot sample is being taken from the final effluent.		

**Action:**

The operator is advised to follow its procedures.

OMA 2: Periodic monitoring and test laboratories		
OMA ELEMENTS	SCORE	COMMENTS
A. Sampling provisions	3	W1 is safe, monitors and sampling equipment is either at ground level and unobstructed, or can be reached using steps and platform. W2 is accessed by leaving the site boundary. Access to W2 is overgrown and the integrity of the infrastructure at W2 cannot be assessed. W3 was not visited during the inspection.
B. Certification of equipment	5	The autosampler is MCERTS certified. The refrigerator does not form part of the certified autosampler but it is fit for purpose and monitored appropriately.
C. Measurement methods and standards	5	Samples are analysed by third party laboratory. Methods are UKAS accredited to ISO17025. Methods for the determination of phosphate and ammonia not as per permit methods but deemed acceptable.
D. Calibration methods	5	Samples are analysed by third party laboratory. Methods are UKAS accredited to ISO17025.
E. Frequency of maintenance and calibration	5	Samples are analysed by third party laboratory. Methods are UKAS accredited to ISO17025.
F. Reliability of equipment (data availability)	5	Samples are analysed by third party laboratory. Methods are UKAS accredited to ISO17025. Sampling equipment has proven to be reliable with no missed samples due to autosampler failure.
G. Breakdown response	2	Spare components for Autosampler are not stored on site. Breakdown arrangements not clear.
H. Traceability	5	Samples are analysed by third party laboratory. Methods are UKAS accredited to ISO17025.
<b>OMA 2 – SCORE</b>	35 (87 %)	

SUMMARY COMMENTS FOR OMA 2

OMA 3: Continuous monitoring		
OMA ELEMENTS	SCORE	COMMENTS
A. Provisions for monitoring and location of continuous monitors	5	W1 is safe, monitors and sampling equipment is either at ground level and unobstructed, or can be reached using steps and platform.
B. Certification continuous monitors	5	All continuous monitoring equipment is compliant with MCERTS. EMS9.9.1.1.4 EMP describes that all new monitoring equipment should be MCERTS complaint and certified.
C. Measurement methods and standards	2	All continuous monitoring equipment is compliant with MCERTS. However, pH monitor has not been calibrated and is showing a high pH reading. The pH monitoring is undertaken on a collected spot sample using a pH probe. This represents a significant variation from the methods relevant to the permit.
D. Calibration methods	2	Flow meter and autosampler are inspected by MCERTS and certified. However, pH monitor has not been calibrated and is showing a high pH reading. No procedures for the calibration of the pH meter within site procedures.
E. Frequency of maintenance and calibration	2	Flow meter and autosampler are inspected by MCERTS and certified. However, pH monitor has not been calibrated and is showing a high pH reading. No procedures for the calibration of the pH meter within site procedures.
F. Reliability of methods (data availability)	2	Flow meter and autosampler are inspected by MCERTS and certified. However, pH monitor has not been calibrated and is showing a high pH reading. No procedures for the calibration of the pH meter within site procedures.
G. Breakdown response	2	Spare MCERTS compliant flow meter is available and could be installed immediately. A breakdown of the pH meter or autosampler would require a call out to the manufacturer. There is no guarantee that a repair or replacement could be provided within 48 hours.

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H. Traceability	2	Flow meter and autosampler are inspected by MCERTS and certified. However, pH monitor has not been calibrated and is showing a high pH reading. No procedures for the calibration of the pH meter within site procedures.
<b>OMA 3 – SCORE</b>	22 (55 %)	
<b>SUMMARY COMMENTS FOR OMA 3</b>		
Scores have been heavily affected by failure to ensure that pH meter remains calibrated.		

<b>OMA 4: Quality assurance</b>		
<b>OMA ELEMENTS</b>	<b>SCORE</b>	<b>COMMENTS</b>
A. External quality control schemes	5	Samples are analysed by third party laboratory. Methods are UKAS accredited to ISO17025.
B. Internal data QC	3	Internal data is entered into a spreadsheet. Data from continuous monitors is routinely collected and stored. No further manipulation such as the preparation of graphs is performed on the data.1
C. Competence of monitoring personnel	1	Sampling and analysis personnel have no relevant training, qualifications, or experience. No training records are kept. There is no monitoring training plan or procedure. Air monitoring personnel are not appropriately MCERTS certified.
D. Auditing of monitoring	1	Audit reports were evidenced, but not for monitoring. No standard procedures for auditing of monitoring were evidenced.
E. Audit compliance	1	No audit reports for monitoring were evidenced by the operator.
F. Reporting	1	Report monitoring data is submitted to NRW, adequately displaying the parameters specified by the permit. However, the reporting fails to disclose deviations from the analytical methods that are discussed by the permit. See comments for further discussion.
<b>OMA 4 – SCORE</b>	12 (40 %)	
<b>SUMMARY COMMENTS FOR OMA 4</b>		
The operator must ensure that internal auditing of monitoring is undertaken, following a robust methodology to ensure that any deviations from permit compliance are detected.		