OMA Report – Emissions to Air – EPR

Summary sheet		
Permit Number: PP3834CB	Compliance Officer: Jamie Blythin & Stuart Ross	
Operator: Ceram Tec UK Ltd	Auditor (if different):	
Emission Point(s): B6, B7 & B24	Others Present: Rhian Newton	
OMA Sections		SCORE
OMA 1 – Management of monitoring		72%
OMA 2 – Periodic monitoring and test laboratories		95%
OMA 3 – Continuous monitoring		N/A
OMA 4 – Quality assurance		83%
	OVERALL SCORE	85%
OVERALL SITE ASSESSMENT COMMENTS		Letter
		Variation
		Enforcement

This updated Operator Monitoring Assessment (OMA) audit report is issued following review of the operator's auditing procedure (RUA-BM-PR-03) which was submitted to Natural Resources Wales on 02/08/23.

The changes made in this report reflect the fact that the operator has a documented internal auditing procedure in place and include an increase in the score for OMA4-D-Auditing of monitoring (increased from 2 to 3) and subsequent increase in the overall score.

This updated OMA audit report replaces the report issued on 01/08/23.

This OMA audit was completed on site.

Overall, monitoring of emissions to air is well managed but there were some areas for improvement identified- see actions in report.

Date of audit: 04/07/23
Signed: J.Blythin
Date: 08/09/23

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OMA 1: Management of monitoring		
OMA ELEMENTS	**SCORE**	**COMMENTS**
A. Documentation of management system procedures for monitoring	3	The operator has effective and generally well written monitoring procedures as part of a management system. Site Specific Protocols (SSPs) are reviewed before air monitoring commences but evidence of sign off was not provided during the audit. Procedure RUA EN PR 17 Issue No 4 Monitoring of Emissions to Air should be updated to include the requirement for SSP to be supplied, reviewed and signed off ahead of monitoring.
B. Organisational structure for monitoring	4	Roles and responsibilities are defined in an organisational chart and associated management system procedures.
C. Schedules and planning of monitoring, including contingencies	4	Monitoring is booked in advance at the beginning of the year. The scheduling of monitoring is achieved via the use of Outlook Calendars. Senior Management Team are aware of monitoring schedules.
D. Monitoring records and use of monitoring data	3	The reported emissions monitoring data are reviewed by the site's relevant Production Manager and recorded in the Monthly form. The Production Manager will inform the Head of HSEQ in accordance with the "Monitoring & Measurement" procedure detailed in the site's Environmental Management Policy Manual of any breach of limits or potential breach of limits.
E. Understanding the requirements of the permit and monitoring methods	4	The operator's personnel responsible for monitoring arrangements demonstrate a good understanding of the monitoring requirements as set in the permit.
OMA 1 – SCORE	18/25	72%

SUMMARY COMMENTS FOR OMA 1
Air-OMA1A- Action 1- Procedure RUA EN PR 17 Issue No 4 Monitoring of Emissions to Air should be updated to include requirement for SSP to be supplied, reviewed and signed off ahead of monitoring.

OMA 2: Periodic monitoring and test laboratories		
OMA ELEMENTS	**SCORE**	**COMMENTS**
A. Sampling provisions	3	The sampling platforms are not fully compliant with the requirements of TGN M1 and EN 15259 (as evidenced by comments within the test reports and SSPs). Emission points are not labelled.
B. Certification of equipment	5	Monitoring completed by third-party MCERTS accredited test house.
C. Measurement methods and standards	5	All the methods used are listed in the permit. Recent test reports do not report any monitoring deviations associated with the sampling provision deficiencies.
D. Calibration methods	5	Calibration has been carried out under UKAS/MCERTS accreditation.
E. Frequency of maintenance and calibration	5	Maintenance and calibration has been carried out under UKAS / MCERTS accreditation.
F. Reliability of methods and equipment (data availability)	5	Monitoring completed by third-party MCERTS accredited test house. Equipment is reliable, repeat analysis due to equipment failures occur rarely.
G. Breakdown response	5	Monitoring completed by third-party MCERTS accredited test house.
H. Traceability	5	Calibration has been carried out under UKAS/MCERTS accreditation.
OMA 2 – SCORE	38/40	95%

SUMMARY COMMENTS FOR OMA 2

Emission Point B24, previously there was a requirement to sample this emission point over two days due to a restricted number of ports. An additional port has been installed so monitoring can now be carried out simultaneously.

OMA 3: Continuous monitoring		
OMA ELEMENTS	**SCORE**	**COMMENTS**
A. Provisions for monitoring and location of continuous monitors	N/A	
B. Certification of continuous monitoring	N/A	
C. Do not assess for air, water only	N/A	
D. Calibration methods	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		
This section is not applicable – No Continuous Emissions Monitoring		

OMA 4: Quality assurance		
OMA ELEMENTS	**SCORE**	**COMMENTS**
A. External quality control schemes	5	Air emissions monitoring carried out by third-party MCERTS accredited test house.
B. Internal data QC	5	Air emissions monitoring carried out by third-party MCERTS accredited test house. The operator reviews data validity against knowledge of expected process emissions and queries with the test house as required.
C. Competence of monitoring personnel	5	Air emissions monitoring carried out by suitably trained third-party MCERTS accredited test house.
D. Auditing of monitoring	3	Internal audits are carried out, the structure of which follows the same elements as NRW's OMA. The operator has a documented internal auditing procedure in place (RUA-BM-PR-03). This procedure provides an overview of internal auditing scheduling and the internal audit process e.g. staff responsible for completing audits, compliance assessment, how actions are tracked and escalated. Document RUA-BM-PR-03 is a generic overarching audit procedure that applies to all internal and external audits completed at the site. The document includes specific sections relating to process audits and product audits. It is recommended that this procedure is updated to include specific sections relating to emissions monitoring (air and sewer).
E. Audit compliance	3	Audit records are available. The operator has a documented internal auditing procedure in place (RUA-BM-PR-

		03) which explains how audit reports are reviewed, compliance assessed and actions tracked.
F. Reporting	4	Monitoring returns are in accordance with the permit. Mass emissions are calculated using an Excel spreadsheet. This was briefly demonstrated during the OMA and appears fit for purpose. A procedure is in place for the use of the spreadsheet.
OMA 4 – SCORE	25/30	83%

SUMMARY COMMENTS FOR OMA 4
Air-OMA4D-Action 2- Update audit procedure (RUA-BM-PR-03) to include specific sections relating to emissions monitoring (air and sewer).