OMA Report – Emissions to Sewer – EPR

Summary sheet			
Permit Number: PP3834CB	Compliance Officer: Jamie Blythin & Stuart Ross		
Operator: Ceram Tec UK Ltd	Auditor (if different):		
Emission Point(s): S1	Others Present: Rhian Newton		
OMA Sections			SCORE
OMA 1 – Management of monitoring			68%
OMA 2 – Periodic monitoring and test laboratories			87%
OMA 3 – Continuous monitoring			N/A
OMA 4 – Quality assurance			73%
		OVERALL SCORE	76%
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 Operator Monitoring Assessment (OMA) audit was completed on site.

Overall, monitoring of emissions to sewer 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

OMA 1: Management of monitoring		
OMA ELEMENTS	**SCORE**	**COMMENTS**
A. Documentation of management system procedures for monitoring	3	Comprehensive management system procedures for monitoring-OMA water monitoring manual. Procedure RUA-BM-02 Issue 2 overarching water monitoring procedure. RUA-EN-PR-19 v3 more detailed procedure includes sampling. Procedure 'RUA-EN-WI-29 V1 sets out evaluation of external monitoring company for MCERTS'
B. Organisational structure for monitoring	4	Comprehensive organisational structure with roles and responsibilities clearly defined.
C. Schedules and planning of monitoring, including contingencies	4	Monitoring booked in advance at the beginning of the year. Dates added to outlook calendars. Senior Management Team are aware of monitoring schedules.
D. Monitoring records and use of monitoring data	3	Data reviewed daily by monitoring team, data reviewed every 2 weeks by RN, weekly management review meetings. Monitoring data entered into spreadsheets. These records are inspected quarterly by the Engineering manager to look for trends.
E. Understanding the requirements of the permit and monitoring methods	3	The operator's personnel responsible for monitoring arrangements demonstrate a good understanding of the monitoring requirements as set in the permit.
OMA 1 – SCORE	17/25	68%
SUMMARY COMMENTS FOR OMA 1		

OMA 2: Periodic monitoring and test laboratories		
OMA ELEMENTS	**SCORE**	**COMMENTS**
A. Sampling provisions	3	The sampling location allows for representative spot sampling of treated effluent prior to entry into the foul sewer. The sample point is not labelled. Refer comments below re. sampling location.
B. Certification of equipment	N/A	Portable monitors and auto samplers are not in use.
C. Measurement methods and standards	3	Table S3.3 within the permit does not specify any particular methods but includes a requirement that analysis is performed using a 'UKAS approved method'. Analysis is performed using a UKAS accredited method (internal laboratory method code TM152). Going forward MCERTS methods must be used to ensure compliance with permit condition 3.3.3. It is noted that the existing laboratory offers the relevant MCERTS method. Refer comment below re. total or dissolved metals requirement.
D. Calibration methods	5	Analysis completed by third party UKAS accredited laboratory.
E. Frequency of maintenance and calibration	5	Analysis completed by third party UKAS accredited laboratory.
F. Reliability of methods and equipment (data availability)	5	Analysis completed by third party UKAS accredited laboratory.
G. Breakdown response	N/A	
H. Traceability	5	Analysis completed by third party UKAS accredited laboratory

OMA 2 – SCORE	26/30	87%

SUMMARY COMMENTS FOR OMA 2

There are two discharge lines entering the S1 sampling chamber. As per existing procedure, one of these locations previously required a valve to be opened and the line purged before sampling occurred. However, upon inspecting the chamber, the valve has been removed and it appears unnecessary for this sample line to be used given there is a frequent discharge from a larger diameter pipe into the chamber than could easily be sampled.

Sewer-OMA 2A- Action 1 – review the S1 chamber sampling arrangements and update your procedures accordingly.

Sewer-OMA2A-Action 2 – For the avoidance of doubt, the sample point shall be labelled.

Site staff from the maintenance team collect samples from the designated sample point using sample containers supplied by the test laboratory. The samples are then delivered to the UKAS accredited test laboratory on the same day for analysis.

The sample is collected at the same time as DCWW collect their compliance sample for assessment against the Trade Effluent Consent.

Environmental Management Solutions Ltd organise the scheduling and analysis of samples with ALS on behalf of the operator as this reportedly secures the required sample turn around time.

Total / Dissolved Metals

Table S3.3 of the permit requires that lead and zinc are analysed. It does not state ‘total’ or ‘dissolved’ but ordinarily NRW would interpret ‘Lead’ to mean ‘Total Lead’.

The operator has historically analysed for dissolved lead (filtered samples) and this difference in interpretation was identified by the site inspector prior to the OMA.

NRW has reviewed the permit application documents and sector Bref. The permit decision document refers to dissolved lead in the context of the H1 risk assessment and uses an emission limit value of 0.5mg/l that is of unknown origin. There remains some uncertainty as to the exact monitoring requirement.

For the purposes of this OMA, we have not determined the monitoring of dissolved lead to be in breach of permit, nor adversely influence the individual scoring of the OMA elements. The issue will be progressed via separate correspondence.

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
No continuous emissions monitoring.

OMA 4: Quality assurance		
OMA ELEMENTS	**SCORE**	**COMMENTS**
A. External quality control schemes	4	UKAS accredited laboratory used for analysis. MCERTS methods not currently used by the operator.
B. Internal data QC	4	UKAS accredited laboratory completes analysis. MCERTS methods not currently used by the operator.
C. Competence of monitoring personnel	4	UKAS accredited laboratory carries out analysis. Samples collected by trained site personnel.
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 and reporting carried out in line with permit. Laboratory analytical reports do not include analytical uncertainty.
OMA 4 – SCORE	22/30	73%

SUMMARY COMMENTS FOR OMA 4
Sewer-OMA4D- Action 3- Update audit procedure (RUA-BM-PR-03) to include specific sections relating to emissions monitoring (air and sewer).