

OMA Report – Emissions to Air – EPR

Summary sheet		
Permit Number: UP3831ES	Compliance Officer: Phil Harper	
Operator: TS Resins	Auditor (if different): Phil Harper & Kathryn Bradshaw	
Emission Point(s): A18	Others Present: Jim Hadley, Paul De Wolf, Gavin Ding	
OMA Sections		SCORE
OMA 1 – Management of monitoring		22/25
OMA 2 – Periodic monitoring and test laboratories		40/40
OMA 3 – Continuous monitoring		N/A
OMA 4 – Quality assurance		20/30
OVERALL SCORE		86 %
OVERALL SITE ASSESSMENT COMMENTS		
The operator can demonstrate a high level of compliance with the required standards for monitoring emissions to air. Implementation of the auditing of monitoring would result in a higher OMA score.		
Date of audit: 18/10/2023		
Signed: 		
Date: 20/11/2023		

OMA 1: Management of monitoring		
OMA ELEMENTS	SCORE	COMMENTS
A. Documentation of management system procedures for monitoring	5	SOP provided by the operator clearly describes the management procedures. ISO9001, ISO14001 and ISO45001. Certification currently valid. from 1 April 2021 to 31 st March 2023. Document control an access demonstrated. Documentation shows that EMS is regularly updated.
B. Organisational structure for monitoring	4	Organogram identifies roles and names individuals. Documentation shows who has responsibility for monitoring. Sufficient resources are available for monitoring however, this is not formally documented.
C. Schedules and planning of monitoring, including contingencies	5	Monitoring frequency and planning provided by SOPs. SSP provided by contractor. SOP requires that testing is arranged for May each each, this gives plenty of time for retesting. Retesting has taken place in 2021 and 2022 following stack emission failures.
D. Monitoring records and use of monitoring data	3	SOP provides instructions for the review of reports and results. Results are documented but only one result per year. Results are discussed in annual management review. Clearly defined process in what to do in the event of failure.
E. Understanding the requirements of the permit and monitoring methods	5	Staff demonstrated an understanding of the permit and monitoring requirements.
OMA 1 – SCORE	22/25	
SUMMARY COMMENTS FOR OMA 1		
A. <u>Documentation of management system, procedures for monitoring.</u> The environmental management systems for TS Resins are accredited to ISO9001, ISO14001 and ISO45001. The management systems are audited internally and externally on an annual basis. Documents are available to all relevant staff but are controlled to ensure the correct versions are available to staff. Records show that documents within the environmental management system are regularly reviewed and updated. B. <u>Organisational Structure for Monitoring</u> Documentation was provided which shows who has responsibility for monitoring. Sufficient resources are available for monitoring; however, this is not formally documented. An organogram was provided which identifies roles and individuals.		

Advice and Guidance: Update documentation to identify individuals of the monitoring who could deputise and oversee the monitoring if required.

C. Schedules and planning of monitoring, including contingencies

Monitoring frequencies are defined within standard operating procedures for annual MCERTS and routine internal stack emissions monitoring. The plan details when and how contractors should be identified and discusses the submission of relevant procedures such as the site-specific protocol.

D. Monitoring records and use of monitoring data

No trend analysis or manipulation of data is undertaken by the operator. However, it should be noted that monitoring is undertaken once a year.

OMA 2: Periodic monitoring and test laboratories		
OMA ELEMENTS	SCORE	COMMENTS
A. Sampling provisions	5	Permanent sampling platform in place for monitoring which is demonstrably safe. Sampling ports comply with M1 guidance requirements.
B. Certification of equipment	5	MCERTS accredited contractor used.
C. Measurement methods and standards	5	MCERTS accredited contractor used. Monitoring methods comply with US EPA M316 and CEN/TS 13649.
D. Calibration methods	5	MCERTS accredited contractor and MCERTS/UKAS ISO 17025 laboratories accredited for the relevant determinands.
E. Frequency of maintenance and calibration	5	MCERTS accredited contractor and UKAS ISO17025 laboratories used.
F. Reliability of methods and equipment (data availability)	5	No issues with repeat analysis or rescheduling of samples due to equipment failure.
G. Breakdown response	5	Monitoring equipment supplied by MCERTS accredited contractor who would supply replacement equipment.
H. Traceability	5	ISO17025 laboratories undertaking analysis are UKAS/MCERTS accredited.
OMA 2 – SCORE	40/40	
SUMMARY COMMENTS FOR OMA 2		
An external MCERTS accredited contractor is employed for periodic monitoring. The contractors supply all equipment and associated calibration certification. Procedures in place require that the site-specific protocol is in place and reviewed prior to monitoring commencing on site. Atesta provided accreditation details prior to undertaking the latest monitoring in May 2023. The ISO17025 laboratories employed by the contractor are MCERTS/ ULAS accredited for the relevant determinands of interest.		

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		
SUMMARY COMMENTS FOR OMA 3		

OMA 4: Quality assurance		
OMA ELEMENTS	SCORE	COMMENTS
A. External quality control schemes	5	TS Resins maintains an ISO14001 accredited environmental management system which covers monitoring provisions. Periodic monitoring is provided by an MCERTS monitoring contractor which is UKAS accredited. An ISO17025 laboratory is used.
B. Internal data QC	3	Monitoring data reports are reviewed when they are received from the MCERTS accredited contractor. Procedures are documented for the actions taken in the event of an emissions level breach. Data is also discussed during annual Quality review and quarterly HSE meetings to review plant performance.
C. Competence of monitoring personnel	5	3 rd party monitoring contractor, personnel accredited to MCERTS level 1 and 2.
D. Auditing of monitoring	1	Auditing of monitoring contractors has taken place in the past, but the current provider who has undertaken for the monitoring for the last three years has not been audited. No checks of calibration or documentation are undertaken by TS Resins prior to the monitoring being undertaken. No procedures for auditing monitoring contractors have been provided
E. Audit compliance	1	There was no evidence of internal audits having been undertaken for monitoring.
F. Reporting	5	Reporting meets permit requirements.
OMA 4 – SCORE	20/30	
SUMMARY COMMENTS FOR OMA 4		
TS Resins uses MCERTS accredited monitoring contractors and UKAS ISO17025 laboratories for monitoring. The ISO14001 accredited EMS for TS Resins includes monitoring procedures and is audited both internally and externally. Monitoring data reports are reviewed when received from the contractors and any necessary actions are taken inline with the requirements of the permit. A non-conformancy procedure has been provided.		

Whilst TS Resins performs audits on providers, no auditing procedure for monitoring contractors is documented. The current monitoring contractor has been used by TS Resins for 3 years and has not been audited.

Following an OMA audit which was undertaken in 2019 TS Resins was provided with a recommendation to schedule and monitor contractor auditing to ensure it is carried out at the recommended frequency.

Advice and Guidance.

The operator is advised to ensure that internal auditing of monitoring is undertaken, following a robust methodology to ensure that any deviations from permit compliance are detected.