OMA Report – Emissions to Air – EPR

<table>
<tr><td colspan="3">Summary sheet</td></tr>
<tr><td>Permit Number: BU2348IL</td><td colspan="2">Compliance Officer:Phil Harper</td></tr>
<tr><td>Operator: Synthite ltd</td><td colspan="2">Auditor (if different): Phil Harper & Carter Shone</td></tr>
<tr><td>Emission Point(s):</td><td colspan="2">Others Present: Jayme Mountford and Donna Jones</td></tr>
<tr><td colspan="2">OMA Sections</td><td>SCORE</td></tr>
<tr><td colspan="2">OMA 1 – Management of monitoring</td><td>15/25</td></tr>
<tr><td colspan="2">OMA 2 – Periodic monitoring and test laboratories</td><td>40/40</td></tr>
<tr><td colspan="2">OMA 3 – Continuous monitoring</td><td>N/A</td></tr>
<tr><td colspan="2">OMA 4 – Quality assurance</td><td>20/30</td></tr>
<tr><td></td><td>OVERALL SCORE</td><td>75/95

79%</td></tr>
<tr><td colspan="2" rowspan="3">OVERALL SITE ASSESSMENT COMMENTS</td><td>Letter</td></tr>
<tr><td>Variation</td></tr>
<tr><td>Enforcement</td></tr>
<tr><td colspan="3">Overall, the operator has been able to show a high level of required standards for monitoring emissions to air.

A higher OMA score would be obtained with improvements to the use of monitoring data and the auditing of external providers.

Permit breaches have been identified and have been applied in compliance assessment report CAR_NRW0043002 which accompanies this OMA report.</td></tr>
<tr><td colspan="2" rowspan="3"></td><td>Date of audit: 16/11/2023</td></tr>
<tr><td>Signed: P.m</td></tr>
<tr><td>Date: 27/12/2023</td></tr>
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OMA 1: Management of monitoring		
OMA ELEMENTS	**SCORE**	**COMMENTS**
A. Documentation of management system procedures for monitoring	3	Comprehesive mangement system in place which is accredited to 9001 and 14001. All procedures are document controlled with limited access to working copies. Emissions monitoring is discussed within the management system. Procurement of the monitoring contractors is not proceduralised within the management system. Whilst the operator was able to produce SSP for monitoring prior to the OMA, management systems are not descriptive about obtaining this documentation prior to the monitoring taking place.
B. Organisational structure for monitoring	4	EAETM.13 clearly shows responsibility for monitoring and provides deputisation.
C. Schedules and planning of monitoring, including contingencies	2	Schedules clearly defined, with procedures provided in the plan. However, there are no procedures for repeating missed samples. Samples have been missed in Q1 2023 due to heavy snow. These missed samples were not repeated.

D. Monitoring records and use of monitoring data	2	Monitoring data is entered onto a master spreadsheet. Cell conditioning within the spreadsheet colour codes results. If an emission value is greater than 80 % of the emission limit value, the cell turns orange. Exceedences of emission limit value are conditioned to turn red. Technical manager verbally informed that the data is being manipulated for presentation against key performance indicators which were not disclosed. The technical manager was unbale to evidence that this manipulation was taking place during the audit. Procedure TM13 describes the procedure in the event of a permit breach. However, there is no documented process for what actions are to be carried out in the event of a value greater than 80 %. Officers were verbally informed that if a monitoring result at 80 % of the emission limit value is detected then it prompts and investigation.
E. Understanding the requirements of the permit and monitoring methods	4	Key personel have a good awareness of the monitoring requirements fo the permit.
OMA 1 – SCORE	15/25	60 %

SUMMARY COMMENTS FOR OMA 1

A. Documentation of management system, procedures for monitoring.
The environmental management systems for Synthite 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. Organisational Structure for Monitoring
Documentation was provided which shows who has responsibility for monitoring. Sufficient resources are available for monitoring; however, this is not formally docuemented. An organogram was provided which identifies roles and individuals.

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.

OMA 2: Periodic monitoring and test laboratories		
OMA ELEMENTS	**SCORE**	**COMMENTS**
A. Sampling provisions	5	All monitoring locations were compliant with the M1 guidance apart from emission point A17. Emission point A17 is a single stack for three natural gas fired boilers. The site-specific plan for the site shows that the emission from a single boiler is tested during each monitoring campaign. Following the OMA the operator has clarifed that of the three natural gas boilers connected to A17 only 2 are operational and that of the 2 only one boiler operates at any one time with the other boiler in standby in case of breakdowns or maintenance. The permit requires that monitoring is undertaken at A17 every 6 months. However, the operator is undertaking monitoring at A17 on a quarterly basis with the operational boilers being tested alternately. As only one boiler operates at any one time this is regarded as being representative.
B. Certification of equipment	5	MCERTS accredited contractor used
C. Measurement methods and standards	5	MCERTS accredited contractor used. Permitted methods or better are being used.
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	Uses and MCERTS accredited contractor who always has spare equipment availbale. No issues with sourcing spare/replacement equipment.
G. Breakdown response	5	Monitoring equipment supplied by MCERTS accredeted contractor who would supply replacement equipment.

H. Traceability	5	ISO17025 laboratories undertaling analysis are UKAS/MCERTS accredited.
OMA 2 – SCORE	40/40	100 %
SUMMARY COMMENTS FOR OMA 2		

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	MCERTS/UKAS
B. Internal data QC	3	Data is informally reviewed for validity by the operator.
C. Competence of monitoring personnel	5	3rd party monitoring contractor, personnel accredited to MCERTS level 1 and 2.
D. Auditing of monitoring	1	Monitoring is watched by technical manager, but no docuemented auditing procedures and no paperwork being filled out.
E. Audit compliance	1	No auditing
F. Reporting	5	Monitoring meets requirements of the permit.
OMA 4 – SCORE	20/30	66 %

SUMMARY COMMENTS FOR OMA 4
The operator was unable to provide a procedure for the auditing of monitoring contractors or evidence to show that contractors had been audited. The auditing of external monitoring providers is essential to ensure that the monitoring being undertaken is robust and representative of the site emissions.