

OMA Report – Emissions to Water – EPR

Summary sheet

Permit Number: BU2349IL	Compliance Officer: Phil Harper	
Operator: Synthite Ltd	Auditor (if different): Phil Harper & Carter Shone	
Emission Point(s): W1	Others Present: Jayme Mountford and Donna Jones	
OMA Sections		SCORE
OMA 1 – Management of monitoring		18/25
OMA 2 – Periodic monitoring and test laboratories		30/35
OMA 3 – Continuous monitoring		37/40
OMA 4 – Quality assurance		26/30
		OVERALL SCORE
		111/130 85 %
OVERALL SITE ASSESSMENT COMMENTS		Letter
		Variation
		Enforcement
The operator can demonstrate a high level of compliance with the required standards for monitoring emissions to water. Analysis of water monitoring samples is undertaken at the sites in-house laboratory. Although equipment and laboratory provision are not MCERTS certified the Environmental Chemist's MCERTS Level 2 accreditation and level of knowledge is appropriate to the type of monitoring being undertaken.		
		Date of audit: 16/11/2023
		 Signed:
		Date: 27/12/2023

OMA 1: Management of monitoring		
OMA ELEMENTS	SCORE	COMMENTS
A. Documentation of management system procedures for monitoring	4	Comprehensive management 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. Procedures for internal monitoring at S1 and W1 are in place. An individual manual is provided for each sampling location and analyte
B. Organisational structure for monitoring	4	EAETM.13 clearly shows responsibility for monitoring and provides deputisation.
C. Schedules and planning of monitoring, including contingencies	4	Clearly defined schedules for the monitoring of water emissions at W1. Schedule allows for the repeat of missed samples.
D. Monitoring records and use of monitoring data	2	Monitoring data is captured in a master spreadsheet. The spreadsheet is conditioned to change colour with approach to limit and exceedance. No graphics produced. No written procedures for actions in on detection of an approach to limit sample.
E. Understanding the requirements of the permit and monitoring methods	4	Key staff demonstrated a thorough understanding of the permit and monitoring requirements.
OMA 1 – SCORE	18/25	72%
SUMMARY COMMENTS FOR OMA 1		
Roles and responsibilities are shown on the general company organogram as well as being discussed in EMS procedures. In relation to monitoring and reporting are set out within the management system with details of deputies to ensure sufficient cover is provided. Results entered onto a colour-coded spreadsheet which highlights when results are close to or exceeding the ELVs to prompt escalation procedures. Permit limits are displayed on the recording forms. All results are emailed to technical management group for review and discussion during regular review meetings.		

Annual audits of all monitoring requirements against the permit are carried out with outcomes recorded and actions identified. EMS auditing schedule for both Synthite and TS Resins are being combined into a single schedule.

Key personnel demonstrated a good awareness of the permit and the requirements for monitoring and reporting

OMA 2: Periodic monitoring and test laboratories		
OMA ELEMENTS	SCORE	COMMENTS
A. Sampling provisions	5	Sampling locations are compliant with M18 guidance document.
B. Certification of equipment		N/A
C. Measurement methods and standards	4	All methods are approved by NRW and comply with the requirements specified by the permit. Documents are available to relevant staff and are reviewed annually.
D. Calibration methods	3	In-house lab is not MCERTS or UKAS accredited. Methods documented in lab manual. Annual audits include calibration methods. Equipment is calibrated and verified at each shift changeover. This is demonstrated by documentation.
E. Frequency of maintenance and calibration	3	Schedule for maintenance and calibration within lab manual, records of completion held in lab.
F. Reliability of methods and equipment (data availability)	5	Equipment reliable is reliable, spare equipment is available and external multiple third-party providers are available to repair equipment in the event of a breakdown. Maintenance records show that instruments are serviced on a regular basis.
G. Breakdown response	5	Sufficient spares and duplicate equipment on site. Multiple contractors available to attend site in the event of a breakdown.
H. Traceability	5	Reference materials are traceable to national standards. Weights and balances are annually certified. Equipment is calibrated at each shift changeover. Synthite has records of the monitoring samples. Every sample has a unique identifier which is recorded. Samples are not retained.
OMA 2 – SCORE	30/35	86 %

SUMMARY COMMENTS FOR OMA 2

Sampling points W1 and S1 are compliant with the M18 guidance.

Water samples are analysed in-house within the site's laboratory. The laboratory is not UKAS accredited. However, laboratory staff have up to date training records. Documented methods are reviewed on at least an annual basis.

Daily equipment calibration is carried out with the laboratory. Calibration reference materials are purchased externally and are traceable to national standards.

OMA 3: Continuous monitoring		
OMA ELEMENTS	SCORE	COMMENTS
A. Provisions for monitoring and location of continuous monitors	5	Flow monitoring facilities comply with guidance requirements.
B. Certification of continuous monitoring	5	MCERTS conformity certificate for flow monitoring at W1 valid to November 2024.
C. Do not assess for air, water only	5	MCERTS conformity certificate for flow monitoring at W1 valid to November 2024.
D. Calibration methods	5	The flow meter is calibrated using an ultrasonic meter which is traceable to national standards for volumetric and mass flow monitoring.
E. Frequency of maintenance and calibration	5	Frequency of maintenance and calibration is appropriate. Schedule and calendar prompts ensure required frequencies are met.
F. Reliability of equipment (data availability)	5	No issues with lost monitoring due to equipment failures.
G. Breakdown response	2	No maintenance contracts are in place on site. Spare equipment is stored on site; however, spare equipment is not the same type as what is installed at W1. No certainty could be provided about whether spare equipment is MCERTS rated. Budget is available to replace the meter in the event of an equipment failure.
H. Traceability	5	Ultrasonic meter is traceable to national standards.
OMA 3 – SCORE	37/40	93 %
SUMMARY COMMENTS FOR OMA 3		
MCERTS conformity certificate for flow monitoring at W1 valid to November 2024. The Reliability Engineer is trained to use a clamp-on ultrasonic flow meter unit which is traceable to national standards and is hired by the site to check all flow monitoring across the site. The unit is used for both volumetric and mass flow monitoring. Acceptance criteria for flow meter agreement with the ultrasonic meter is stated within the site water manual as >92%.		

OMA 4: Quality assurance		
OMA ELEMENTS	SCORE	COMMENTS
A. External quality control schemes	3	Internal lab is not UKAS or MCERTS accredited. ISO 14001 accredited EMS which covers monitoring provisions.
B. Internal data QC	4	Data is reviewed during analysis. Data is recorded against internal action limits and permit requirements.
C. Competence of monitoring personnel	4	Internal training records show that laboratory staff are competent with the monitoring methods.
D. Auditing of monitoring	5	Auditing of internal monitoring is taking place and procedures are available. Audits available
E. Audit compliance	5	Audits have been undertaken and are available for review.
F. Reporting	5	No issues with reporting.
OMA 4 – SCORE	26/30	87 %
SUMMARY COMMENTS FOR OMA 4		
The operator's EMS is accredited to ISO14001 and ISO9001. The EMS includes monitoring procedures for water and is audited both internally and externally. Monitoring data is recorded on a master spreadsheet which is formatted to automatically flag results which are at or approaching the permit limits. Management results are escalated to the management group for review. An audit schedule is in place which flags complete/ incomplete audits. Non-conformance system in place to track and record issues. All monitoring reports meet permit requirements and are normally submitted on time.		