OMA Report – Emissions to Air – EPR

Summary sheet			
Permit Number: EPR/WP3534GX		Compliance Officer: Kathryn Bradshaw	
Operator: Oscar Meyer Foods		Auditor (if different): Jamie Blythin	
Emission Point(s): A1 & A2		Others Present:	
OMA Sections			SCORE
OMA 1 – Management of monitoring			15/25
OMA 2 – Periodic monitoring and test laboratories			39/40
OMA 3 – Continuous monitoring			N/A
OMA 4 – Quality assurance			24/30
		OVERALL SCORE	82%
OVERALL SITE ASSESSMENT COMMENTS			Letter
			Variation
			Enforcement

The site has two emission points to air, A1 and A2 which require annual monitoring to BS EN 14792. There are no emission limit values for these two emission points. The site uses an external accredited contractor to undertake the monitoring.

Overall the air emission monitoring is well managed with some recommendations to improve the overall score, see OMA 1 and OMA 4 sections for recommendations.

Date of audit: 07/02/24
Signed: K Bradshaw
Date: 03/04/2024

OMA 1: Management of monitoring		
OMA ELEMENTS	**SCORE**	**COMMENTS**
A. Documentation of management system procedures for monitoring	3	Documented management system that is accredited to Green Dragon Level 5. Demonstrated to us on site that there is an electronic system in place (Shire) which is managed by the Engineering department and Site Services Manager that triggers alerts to book the monitoring contractor and also to raise any issues from the monitoring contractor. An SSP is available before air monitoring commences
B. Organisational structure for monitoring	3	Organogram identifies roles and names individuals. Document 2.10 D shows who has responsibility for monitoring which is with the site services team.
C. Schedules and planning of monitoring, including contingencies	3	No specifics given in the documentation provided for determining which companies are selected for air monitoring and checking the monitoring meets the required standards. Set up in Shire system to trigger the booking (work order) for the air monitoring and same if any issues were raised by the monitoring company – viewed on site.
D. Monitoring records and use of monitoring data	3	Process monitoring results were provided for the 3 boilers to ensure they are operating efficiently. Testing and recording of results of process boiler checks are completed daily with a system that creates work tasks if any issues are found. Results from the monitoring are not usually tracked as there are no ELV's and only annual monitoring is required
E. Understanding the requirements of the permit and monitoring methods	3	Staff demonstrated an understanding of the permit and monitoring requirements.
OMA 1 – SCORE	15/25	60%
SUMMARY COMMENTS FOR OMA 1		

The site has a documented management system that is accredited to Green Dragon Level 5. There are documents in place which detail which role has the responsibilty to plan and organise the monitoring. There are electronic systems in place to ensure the contractor is booked in advance of when the annual monitoring is required There are no documents specifically detailing how the monitoring contractor is selected and if they meet the requirements and standards defined in the permit.

Process monitoring results are recorded and tracked but do not include the monitoring results. Staff understood the requirements of the permit but had not reviewed and signed the SSP.

Recommendations

- Review documented management system to include procedures to detail the management and selection of the monitoring contractor according to the standards referenced in the permit.
- Record and track results for the annual air monitoring to link in with the process monitoring results for trend analysis.
- Head of Health, Safety, Environment and other staff responsible for monitoring would benefit from MCERTS awareness training to enhance the review of SSPs, monitoring reports and contractor monitoring activities.
- Ensure the Site Specific Protocol (SSP) is reviewed for any deviations or improvements that are advised and is checked against the permit conditions and agreed before work commences.

OMA 2: Periodic monitoring and test laboratories		
OMA ELEMENTS	**SCORE**	**COMMENTS**
A. Sampling provisions	4	External MCERTS accredited contractor is used. The sampling location meets all the requirements specified in EA Guidance Note M1 and EN 15259 except for the access to the ports. Access is deemed safe by the contractor as referenced in the SSP.
B. Certification of equipment	5	MCERTS accredited contractor used.
C. Measurement methods and standards	5	MCERTS accredited contractor used. Monitoring methods comply with EN 14792
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	39/40	98%

SUMMARY COMMENTS FOR OMA 2
The monitoring is completed by an external accredited contractor. The sampling location meets all the requirements specified in EA Guidance Note M1 and EN 15259 except for the access to the ports. The ports are accessed by ladders within a building and once the equipment is the port the monitoring is then done at ground level. The access is deemed safe by the contractor as referenced in the SSP.

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
N/A

OMA 4: Quality assurance		
OMA ELEMENTS	**SCORE**	**COMMENTS**
A. External quality control schemes	5	Peridodic 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. The site does not have any emission limit values for air.
C. Competence of monitoring personnel	5	Third party monitoring contractor, personnel accredited to MCERTS level 1 and 2.
D. Auditing of monitoring	3	Document 2.10L was provided of a completed internal audit which included emission points, discharges and monitoring arrangements.
E. Audit compliance	3	Document 2.10i – Incident investigation and reporting details how non-conformances are raised and actioned but no procedures specifically in place for monitoring.
F. Reporting	5	Reporting meets permit requirements
OMA 4 – SCORE	24/30	80%

SUMMARY COMMENTS FOR OMA 4
Although the site provided documents to show audits were being undertaken of emission points, discharges and monitoring there was limited detail. Recommendation Include more detail in the internal audit schedule of the monitoring arranagements for the site.