OMA Report – Discharges to Water – EPR

Summary sheet	
Permit Number: EPR/WP3534GX	Compliance Officer: Kathryn Bradshaw
Operator: Oscar Meyer Foods	Auditor (if different): Jamie Blythin
Discharge point(s): S1	Others Present:

OMA Sections		SCORE
OMA 1 – Management of monitoring		56%
OMA 2 – Periodic monitoring and test laboratories		50%
OMA 3 – Continuous monitoring		N/A
OMA 4 – Quality assurance		60%
	OVERALL SCORE	51/95 54%
OVERALL SITE ASSESSMENT COMMENTS		Letter
		Variation
		Enforcement

The site has one discharge point to sewer, S1 which the permit requires to be sampled monthly according to the standards/methods detailed in Table S3.3 which have no emission limit values. Measuring equipment referenced in the permit (flow meter & auto-sampler) have not been calibrated therefore actions have been identified in OMA 1 and OMA 2 to bring the monitoring into compliance with the permit.

The site has a trade effluent consent with Dwr Cymru Welsh Water (DCWW) which set their own emission limit values. The effluent plant is well managed with various process parameters continually monitored. DCWW sample from S1 every two weeks and provide the results to the site. Operators and staff responsible have had informal training but this needs to be formally included within the EMS. Internal audits are being completed but not specifically auditing against the monitoring requirements in the permit and some recommendations have been made in OMA 4 to ensure continued permit compliance.

Date of audit: 07/02/2024
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. Documented procedures for different sample testing were provided. Reporting to NRW procedures documented in 2.10t. Limited documentation on calibration and cleaning on flow meter and auot-sampler.
B. Organisational structure for monitoring	4	Posts are clearly and formally identified as having responsibility for monitoring issues in Document 2.10d. Company organogram provided.
C. Schedules and planning of monitoring, including contingencies	2	The monitoring schedule is determined by DCWW who sample twice a month. The site does not take its own monthly samples and send to an accredited laboratory. Reliance is on DCWW to provide sample results although in house testing is conducted daily
D. Monitoring records and use of monitoring data	3	There are documented procedures for review, with provisions for tracking trends. Documentary and electronic evidence shows that monitoring results from in house and DCWW testing are reviewed and acted upon with a view to making improvements.
E. Understanding the requirements of the permit and monitoring methods	2	Although the permit has no emission limit values associated with discharges to water there are requirements in the permit for monitoring methods and certification of the monitoring equipment which the site has not implemented.
OMA 1 – SCORE	14/25	56%

SUMMARY COMMENTS FOR OMA 1
The permit has no emission limit values for water discharges to sewer. Limits are set by DCWW through the trade effluent consent. The testing methods the site uses do not comply with the monitoring method or standard referenced in the permit. It was unknown what standards are used in the DCWW tests. The permit specifies in table S3.3 that 24-Hour flow proportional samples are to be taken monthly for COD, suspended solids and pH and flow to be monitored daily.

Action

1) Ensure a 24-hour flow proportional sample is sent to a UKAS accredited lab for analysis for the parameters detailed in Table S3.3, monthly and send the first set of results to NRW by 31st May 2024.

2) Ensure a suitable monitoring schedule has been implemented to meet the requirements of Table S3.3 of the permit as per permit condition 3.5.1. Evidence of this to be provided to NRW by 28th June 2024.

3) Once the flow meter is calibrated ensure the auto sampler is correctly configured to ensure a 24-hour flow proportional sample is taken as per Table S3.3. Evidence of this to be provided to NRW by 28th June 2024.

4) Implement training on the permit requirements for all staff responsible for monitoring discharges to water to ensure the permit requirements are understood and fully implemented. Evidence of this to be provided to NRW by 28th June 2024.

OMA 2: Periodic monitoring and test laboratories		
OMA ELEMENTS	**SCORE**	**COMMENTS**
A. Sampling provisions	3	The sampling location allows representative spot sampling of treated effluent before discharge to sewer. An auto-sampler also takes composite samples of treated effluent before discharge to sewer.
B. Certification of equipment	2	The auto-sampler and flow meter are not MCERTS.
C. Measurement methods and standards	2	The site does not take its own monthly samples and send to an accredited laboratory. Reliance is on DCWW to provide sample results although in house testing is conducted daily but not to the standards referenced in the permit.
D. Calibration methods	2	The flowmeter is overdue calibration and no service records have been produced for the auto sampler. The site is currently looking at replacing the auto-sampler.
E. Frequency of maintenance and calibration	2	No evidence of service/calibration of flow meter and auto-sampler has been provided but the site are in the process of arranging calibration of the flow meter and purchase of a new auto-sampler.
F. Reliability of equipment (data availability)	3	The equipment on site is reliable with no gaps in monitoring records. Site services team maintain all the monitoring equipment.
G. Breakdown response	3	Critical fault – text messge or alarm will sound in security hut. Site services will attend and repair generally within 2 hours. Critical spares are on site including pumps, pH meter, air compressors
H. Traceability	2	No documentary evidence of calibration is available for the flow meter
OMA 2 – SCORE	19/40	48%

SUMMARY COMMENTS FOR OMA 2
DCWW spot sample results on 17/01/24 varied considerably from the site spot sample results which would indicate the need for possible re-calibration or maintenance of the site equipment.

Action

1) Calibrations and servicing for the measuring equipment including the flow meter and auto-sampler need to be completed in line with manufacturers recommendations with the relevant schedules highlighted in the maintenance system. Once these have been completed forward the documentation to NRW by 28th June 2024

2) When the autosampler and flow meter are replaced ensure, they are MCERTS certified as defined in permit condition 3.5.3

OMA 3: Continuous monitoring		
OMA ELEMENTS	**SCORE**	**COMMENTS**
A. Provisions for monitoring and location of continuous monitors	N/A	
B. Certification continuous monitors	N/A	
C. Measurement methods and standards	N/A	
D. Calibration methods	N/A	
E. Frequency of maintenance and calibration	N/A	
F. Reliability of methods (data availability)	N/A	
G. Breakdown response	N/A	
H. Traceability	N/A	
OMA 3 – SCORE	N/A	
SUMMARY COMMENTS FOR OMA 3		

OMA 4: Quality assurance		
OMA ELEMENTS	**SCORE**	**COMMENTS**
A. External quality control schemes	3	Green Dragon Certified Level 5 management system. Root cause analysis of failures is undertaken and acted upon.
B. Internal data QC	3	The operator reviews data for its validity but does not employ any rigorous checks for data integrity.
C. Competence of monitoring personnel	3	Sampling personnel have some relevant training. Procedures in place for sampling and testing. Training records are in place informally but need to be fully incorporated into the EMS including on relevant permit monitoring conditions.
D. Auditing of monitoring	3	Internal audit procedures in place, specific roles are responsible for managing audits and closing out corrective actions. General internal audits, spot checks are conducted on ETP and staff.
E. Audit compliance	3	Audit records produced with associated compliance action plans and suitable root cause analysis.
F. Reporting	3	Annual monitoring reports submitted to NRW within permit requirements
OMA 4 – SCORE	18/30	60%

SUMMARY COMMENTS FOR OMA 4

Recommendations

1) Training records and procedures need to be kept and maintained for all relevant personnel who conduct testing, monitoring and maintenance of the ETP. The Operator has started to draw up training schedules for the Engineering Department, these need to be formalised and included in the Environmental Management System (EMS).

2) Review the internal audit programme to include the monitoring requirements of the permit.