


## Summary sheet

Permit Number: YP3732LZ	Compliance Officer: Victoria Griffin & Philip Harper	
Operator: Prysmian	Auditor (if different):	
Discharge point(s): S1	Others Present: SHE Manager & External Consultant	
OMA Sections	SCORE	
OMA 1 – Management of monitoring	60%	
OMA 2 – Periodic monitoring and test laboratories	60%	
OMA 3 – Continuous monitoring	N/A	
OMA 4 – Quality assurance	30%	
	OVERALL SCORE	48%
OVERALL SITE ASSESSMENT COMMENTS	Letter	
	Variation	
	Enforcement	
<p>This Operator Monitoring Assessment (OMA) Audit covered emissions to sewer at S1 (Site Drain Leading to Lagoon). S1 location is the Surface Water Discharge Manhole, which discharged to the River Clywedog and is located downstream of the Lagoon. There is sufficient confidence that this sampling location provides representative samples.</p> <p>With the exception to deficiencies with regards to documented competence and training of individuals undertaking the water monitoring and associated contingency in the event in availability of sampling personnel, sampling of water at S1 and scheduling for laboratory analysis is completed to an acceptable standard.</p> <p>Water monitoring events exceed the frequency required as outlined in the permit. This provides a more meaningful data set, which will better reflect water quality with respect to the tested analytes. Interpretation and recording trends of sample results is a requirement of the Operator’s procedures; documented evidence of this could not be provided during the Audit.</p> <p>This report contains actions and recommendations. Permit non-compliance has been identified and is recorded in Compliance Assessment Report ref <b>CAR_NRW_0044620</b>.</p>		
	Date of audit: 18 June 2024	
	Signed: 	
	Date: 29 July 2024	

OMA 1: Management of monitoring		
OMA ELEMENTS	SCORE	COMMENTS
A. Documentation of management system procedures for monitoring	4	<p>ISO 14001 accredited management system, last audited by Rina in October 2023. Observations only, no significant non-conformances recorded by the external auditor.</p> <p>Controlled documented procedures stored on company intranet. EMS documentation is accessible to all staff, only limited personnel have permission to amend, this presents good document control.</p> <p>The EMS is based on Group policies and procedures (prefixed MS) supported by site specific policies procedures (prefixed PWXE).</p> <p>PWXE16 (issue 3, last updated 04/01/21) – is a specific Site Water Sampling Procedure which details sampling from the lagoon and surface water discharge manhole.</p>
B. Organisational structure for monitoring	3	<p>Organogram available on the employee induction presentation. Includes job titles and individual names under each role. The organogram requires review and updating as names are out of date.</p> <p>PWXE8 (issue 4, last updated 04/01/21) – Roles and Responsibility Register, summarises those responsible for the retention, upkeep and maintenance of the associated documents.</p> <p>Specific procedures and documents detail role responsibility for specific activities. The role of Maintenance Manager (Site Maintenance) allows for the nomination of a deputy for specific tasks. There is a lack of contingency for other roles.</p>
C. Schedules and planning of monitoring, including contingencies	3	<p>The SHE manager undertakes the sampling on a relatively regular basis approx. 6-8 week intervals. A specific sampling /monitoring schedule is not available.</p> <p>Samples are scheduled for analysis via an electronic chain of custody form which is emailed to the laboratory.</p>

		<p>A Water Analysis Spreadsheet summarising the results is only available for update by the HSE manager.</p> <p>Environmental Monitoring Document MS-UK-307 (Issue 5, last updated 18/09/2017), details the monitoring requirements (Appendix A), also summarises the selection of third party providers /contractors. Laboratories must be UKAS accredited and any new supplier must be approved by Environment Group in Milan.</p>
D. Monitoring records and use of monitoring data	2	<p>The Water Analysis spreadsheet is a record of water sample analysis results and has been updated since May 2000.</p> <p>Document MS-UK-307, states graphical representation of results to be produced. A graphical representation or interpretation of the results could not be provided by the Operator.</p>
E. Understanding the requirements of the permit and monitoring methods	3	<p>Water Sampling Procedure PWXE16 (issue 3, last updated 04/01/21, details the procedure for sampling, including location description, sample bottles, storage and scheduling. A plan of the sample location is not available.</p> <p>Sampling is undertaken by the SHE manager.</p>
<b>OMA 1 – SCORE</b>	15/25	60%

### SUMMARY COMMENTS FOR OMA 1

The company has an ISO 14001 accredited management system, which includes a number of robust procedures that cover the monitoring of water from emission point S1.

There is a lack of contingency for roles associated with water monitoring. This issue was formally raised in the most recent external ISO14001 audit. The Operator confirmed that a procedure to address this is being developed.

**Action 1.** Provide NRW with a copy of the new personnel contingency procedure by **30 September 2024**.

A specific monitoring /sampling schedule is not included within the EMS documentation. Prepare a sampling schedule which is accessible to those appointed to undertake the water monitoring.

**Action 2.** Provide NRW with evidence of the sampling schedule by **30 September 2024**.

**Recommendation.** Consideration should be given to using the ALS online scheduling portal (MyALS) to provide continuity when scheduling samples for analysis and to minimise the potential for data loss.

Annual monitoring results are reported in accordance with Condition 4.2.3 of the Permit. A review of the data has not been undertaken as required by their procedure and which is also in breach of Condition 4.2.2 (a) of the Permit which requires *a review of the results of the monitoring and assessment carried out in accordance with Permit including an interpretive review of that data.*

Evidence of an evaluation of the water monitoring frequency against periods when the lead coating process was operational or otherwise could not be provided. Given the intermittent operation of the lead coating processes, the water monitoring may not be reflective of actual lead concentrations in water discharges.

**Action 3.** Include a review of the results in each Annual Report as required by the Permit. Include a review of the results to date and cross reference any sampling data with the historical and recent operation of the lead coating process. Provide NRW with the report as part of the 2024 annual return submission as specified by the Permit.

OMA 2: Periodic monitoring and test laboratories		
OMA ELEMENTS	SCORE	COMMENTS
A. Sampling provisions	3	The surface water river outflow sampling location is labelled. The sampling method from this location is likely to ensure a representative sample is recovered.
B. Certification of equipment	N/A	The external lab is UKAS accredited for all the techniques.
C. Measurement methods and standards	N/A	The external lab is UKAS accredited for all the techniques.
D. Calibration methods	N/A	The external lab is UKAS accredited for all the techniques
E. Frequency of maintenance and calibration	N/A	The external lab is UKAS accredited for all the techniques
F. Reliability of equipment (data availability)	N/A	The external lab is UKAS accredited for all the techniques
G. Breakdown response	N/A	The external lab is UKAS accredited for all the techniques
H. Traceability	N/A	The external lab is UKAS accredited for all the techniques
<b>OMA 2 – SCORE</b>	3/5	60%
SUMMARY COMMENTS FOR OMA 2		
<p>The standard or method as included in the Permit have been specified when scheduling analysis as required.</p> <p>The sample point is labelled, the manhole chamber is covered and sealed with a well fitting manhole cover.</p> <p>Additional sampling from the lagoon is also undertaken in accordance with Water Sampling Procedure PWXE16. Sampling from the lagoon is not a requirement of the Permit and is not reported to NRW, however it is identified within the Water Sampling Procedure. The lagoon sampling location is described within the procedure but is not labelled. The procedure states..... <i>a 3 metre extendable pole fitted with a large 1 litre plastic sampling container is lowered into the water and filled, then removed to the sampling area. The contents of the first sample are</i></p>		

*removed from the container and disposed of to ensure any debris or contaminants within are removed.....* Given the size and depth of lagoon and the lack of mechanical mixing, the method of sample collection is unlikely to be representative.

**Action 4.** Review and amend the method of sample recovery to ensure that representative samples are obtained.

The Operator uses ALS Laboratories (UK) Ltd which are fully UKAS accredited. Accreditation exists for analytes scheduled as evidenced in the laboratory results provided to the Operator.

<b>OMA 3: Continuous monitoring</b>		
<b>OMA ELEMENTS</b>	<b>SCORE</b>	<b>COMMENTS</b>
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	
<b>OMA 3 – SCORE</b>	N/A	
<b>SUMMARY COMMENTS FOR OMA 3</b>		
No continuous monitoring used for emissions to water.		

OMA 4: Quality assurance		
OMA ELEMENTS	SCORE	COMMENTS
A. External quality control schemes	N/A	External UKAS accredited laboratory used.
B. Internal data QC	N/A	External UKAS accredited laboratory used.
C. Competence of monitoring personnel	2	Sampling personnel have been provided with some recent handover training; however this has not been documented /formalised. There are no specific training records or training procedures /plans for water monitoring.
D. Auditing of monitoring	1	Water monitoring is not audited against the procedure.
E. Audit compliance	1	Auditing is not undertaken for the water monitoring, consequently, audit records were not available to view.
F. Reporting	2	The contents of the permit return do not fully meet the permit requirements with documents that cover what is required and when for the reporting requirements.  The UKAS accredited external lab reports have an analytical uncertainty associated with the results.
<b>OMA 4 – SCORE</b>	6/20	30%
SUMMARY COMMENTS FOR OMA 4		
<p>The SHE manager is leaving the role /company and the temporary SHE replacement has received limited water monitoring training. There is no clear provision for a handover to the replacement SHE once appointed. The findings of the audit strongly suggest that the previous handover was also lacking in substance and there are no specific training records or training procedure /plan for water monitoring. The lack of training was particularly reflective following a review of the 2023 annual returns submitted to NRW.</p> <p>This is a breach of Condition 1.1.1 (b) of the Permit which requires that...<i>the operator shall manage and operate the activities:.....(b) using sufficient competent persons and resources.</i></p>		

**Action** – Investigate and address how personnel are appointed and inducted to specific roles, with particular emphasis on a robust technical handover and senior management support. Provide NRW with evidence of sufficient competent persons in roles or provide a proposal and timeline to address this by **30 September 2024**.

The SHE Manager confirmed that water monitoring is not audited against the procedure, as they alone are responsible for water monitoring. This reinforces the lack of contingency for the water monitoring process as a whole.

This is a breach of Condition 1.1.1 (a) of the Permit which requires that...*the operator shall manage and operate the activities: (a) in accordance with a written management system....*

**Action** – Provide NRW with an internal auditing programme which identified and utilises departments /personnel who are not directly associated with the monitoring activities to undertake the audits by **30 September 2024**.