

OMA Report – Discharges to Water – EPR

Summary sheet		
Permit Number: AB3697CN	Compliance Officer: Victoria Griffin	
Operator: Radnor Hills Mineral Water Company Ltd	Auditor (if different):	
Discharge point(s): W1	Others Present: Environmental Manager & Technical Director.	
OMA Sections	SCORE	
OMA 1 – Management of monitoring	88%	
OMA 2 – Periodic monitoring and test laboratories	90%	
OMA 3 – Continuous monitoring	70%	
OMA 4 – Quality assurance	73%	
	OVERALL SCORE	80%
OVERALL SITE ASSESSMENT COMMENTS		Letter
		Variation
		Enforcement
<p>The operator has one water emission point (W1) with weekly monitoring and continuous monitoring of specific parameters as per S3.2 of the Permit. An external UKAS accredited laboratory is used for analysis of weekly monitoring samples.</p> <p>The operator's management system is accredited to ISO14001. Provisions for management of monitoring, through the EMS and associated systems, and auditing and reporting of monitoring data are typically of a good standard.</p>		
		Date of audit: 04 July 2024
		Signed: V Griffin
		Date: 16 August 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 audit date September 2023, next audit due August 2024.</p> <p>No non-conformances recorded during last audit. A single observation, associated with segregation of waste, was recorded.</p> <p>The EMS is held on a cloud-based system. Only senior leadership team and key individuals have access. EMS documents are reviewed and updated annually as required.</p> <p>There is a shared company folder for EMS. The documents are in PDF format, so that all office-based staff can access them. Line based operatives do not have access to electronic documents, instead they are informed of EMS through induction /awareness sessions and from key information posted in production areas.</p> <p>EMS 007 – Monitoring Emissions Procedure and EMS 006 – Effluent Testing Procedure include some detail for sampling in accordance with the permit. They do not include specific requirements for sampling and scheduling for external MCERTS laboratory analysis.</p>
B. Organisational structure for monitoring	5	<p>There is a management structure, with clearly defined roles and responsibilities. Nominated deputies and adequate contingency for key roles is identified, with additional training proposed to support these roles further.</p> <p>Training requirements are identified and documented in accordance with EMP 010 – Identification of Training Needs.</p> <p>EMS 019 – Roles and Responsibilities (issue 1.8, last updated 02/07/2024). Summarises the primary individuals with organisational roles, responsibilities and “authorities of the EMS”.</p>

		<p>Personnel names, their role, department, responsibilities, and accountability are documented.</p> <p>Brief (SIC) meetings are undertaken by the senior management team three times a day to review plant operations and any impact on the effluent treatment plant (ETP). This contributes to the smooth running of the ETP and minimises the risk of permit breaches.</p> <p>There is adequate provision for dealing with live monitoring issues.</p> <p>In hours issues are directed to the Environmental Manager and Technical Director via one of the Environmental Controllers.</p> <p>Out of hours monitoring issues are alerted via the effluent treatment plant alarm system and cascaded in accordance with the personnel rota.</p>
C. Schedules and planning of monitoring, including contingencies	3	<p>Monitoring schedule is not formally documented, but operatives with monitoring responsibilities are aware of the monitoring required to satisfy the permit.</p> <p>There are sufficient trained operatives (on a European shift pattern) available to address any required monitoring. The Environmental Manager and /or Technical Director can support when resource issues dictate the need.</p>
D. Monitoring records and use of monitoring data	5	<p>EMP 011 – Monitoring Schedule of Permit and EMS 013 NRW Permit Breaches and Reporting Procedure, summarise monitoring, reporting and notification requirements in accordance with the permit.</p> <p>A comprehensive 'Plant Spreadsheet' reports all necessary data for the effluent treatment plant and is continuously updated. The data is reviewed by the Technical Director and Environmental Manager to inform any adjustments required to better manage the efficiency of the ETP.</p> <p>Where necessary the SCADA system can be interrogated for recent and historical data.</p>

		<p>There is evidence of results being reviewed and tracking of trends in accordance with Condition 4.2.2 (a) of the Permit.</p> <p>Emergency alarms are set on numerous elements of the ETP, including the continuous temperature and pH probes and flow meter.</p>
E. Understanding the requirements of the permit and monitoring methods	5	<p>The monitoring requirements of the permit are being fully met. Whilst a monitoring procedure /work instruction for external MCERTS laboratory sampling and analysis is not available, the operatives are fully aware of the required monitoring as per the permit. This was verified by an Environmental Controller who demonstrated the external sampling and monitoring procedure.</p> <p>Environmental Operatives are trained by the Environmental Manager and /or Technical Director. Training requirements are identified and documented in accordance with EMP 010 – Identification of Training Needs. Site wide training record for all individuals – records are sent to Human Resources and can be requested for re-review by senior managers.</p> <p>Aquabio (ETP supplier) deliver ETP training to the environment team. Additionally, they provide external operating manuals for reference. New training is provided if there is a change to the ETP system.</p> <p>The permit specifies composite monitoring sampling. However, an instantaneous sampling method has previously been trialled and agreed with NRW as an appropriate alternative to the composite sample.</p>
OMA 1 – SCORE	22/25	88%
SUMMARY COMMENTS FOR OMA 1		
<p>The company has an ISO 14001 accredited management system and has several robust procedures and schedules that cover the monitoring and discharges of water from emission point W1.</p>		

Recommendation 1. A specific monitoring /sampling schedule is not included within the EMS documentation. It is recommended that the operator prepare a sampling schedule which is accessible to those appointed to undertake the water monitoring.

Recommendation 2. The EMS does not include specific requirements for sampling and scheduling for external MCERTS laboratory analysis. It is recommended that the operator prepare a work instruction /procedure for sampling and scheduling for external MCERTS laboratory analysis.

OMA 2: Periodic monitoring and test laboratories		
OMA ELEMENTS	SCORE	COMMENTS
A. Sampling provisions	4	<p>The sampling facilities enable representative samples to be undertaken safely and to be stored appropriately prior to dispatch to the MCERTS laboratory for analysis.</p> <p>The sample location is accessible, but the sample point label isn't clear. Needs updating to avoid confusion.</p> <p>Samples are stored in a dedicated samples fridge prior to being packed in laboratory supplied cool bags with ice packs.</p> <p>A regular pre-arranged sample collection time is agreed with the courier. Samples are typically collected within 6 hours of being taken.</p>
B. Certification of equipment	N/A	UKAS Accredited laboratory used for analysis required by the permit.
C. Measurement methods and standards	5	The external lab is UKAS accredited for all the methods. Site has a contract in place with the external lab for weekly sample analysis for a pre-specified suite.
D. Calibration methods	N/A	UKAS Accredited laboratory used for analysis required by the permit.
E. Frequency of maintenance and calibration	N/A	UKAS Accredited laboratory used for analysis required by the permit.
F. Reliability of equipment (data availability)	N/A	UKAS Accredited laboratory used for analysis required by the permit.
G. Breakdown response	N/A	UKAS Accredited laboratory used for analysis required by the permit.
H. Traceability	N/A	UKAS Accredited laboratory used for analysis required by the permit.
OMA 2 – SCORE	9/10	90%

SUMMARY COMMENTS FOR OMA 2

The standard or method as included in the Permit have been specified when scheduling analysis as required. 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

Recommendation 3. The sample point is accessible but is not clearly labelled. It is recommended that the operator clearly label W1 sample point to avoid the risk confusion in the event that alternative operators /3rd party contractors are required to undertake the monitoring in the future.

OMA 3: Continuous monitoring		
OMA ELEMENTS	SCORE	COMMENTS
A. Provisions for monitoring and location of continuous monitors	3	The sampling facilities comply with the requirements of the Regulator.
B. Certification continuous monitors	3	The Permit specifies an MCERTS certified flow meter and pH probe. The pH meter was confirmed to be MCERTS certified. Correspondence with the regulating officer agreed that the existing non MCERTS certified flow meter is acceptable.
C. Measurement methods and standards	3	There are some minor deviations from the monitoring method specified in the permit i.e., the use of the non-MCERTS certified flow meter.
D. Calibration methods	4	Continuous water monitors for flow, pH and temperature are calibrated annually by a specialist third party. External calibration certificates were viewed.
E. Frequency of maintenance and calibration	3	Maintenance and calibration of the CWM are in accordance with manufacturer's recommendations.
F. Reliability of methods (data availability)	4	Equipment is reliable, CWM results are recorded via SCADA and transferred to 'Plant Spreadsheet'.
G. Breakdown response	5	Spare of flow meter and multiple pH and temperature probes kept on site. Spares on site which can also be re-purposed if necessary. Service contracts in place for all monitoring equipment.
H. Traceability	3	All calibration parameters are traceable.
OMA 3 – SCORE	28/40	70%
SUMMARY COMMENTS FOR OMA 3		
Annual calibrations by an external 3rd party contractor are carried out alongside regular on-site calibrations and checks of the equipment. A full duplicate set of this equipment is also available on site in case of breakdowns. Service contracts are in place for all the monitoring and measuring equipment.		

OMA 4: Quality assurance		
OMA ELEMENTS	SCORE	COMMENTS
A. External quality control schemes	4	External Lab UKAS accredited. Blanks and spiked samples sent to laboratory as part of internal quality procedure. Operator representative undertook a laboratory visit, following samples to the external UKAS laboratory to review the process.
B. Internal data QC	3	Internal data is regularly reviewed by senior management team. No formal review procedures.
C. Competence of monitoring personnel	4	Sampling personnel have received training. Training records provided. External Laboratory is UKAS accredited.
D. Auditing of monitoring	4	Fully documented auditing procedures linked to the management system are available. The audit plan covers all monitoring activities. Internal audits are undertaken by site personnel who are not directly associated with the audited activities.
E. Audit compliance	4	No non-compliances at internal audits. The operator has a comprehensive system for tracking and closing out actions following audits.
F. Reporting	3	Contents of the permit return typically meet the permit requirements. The UKAS accredited external lab reports have an analytical uncertainty associated with the results
OMA 4 – SCORE	22/30	73%
SUMMARY COMMENTS FOR OMA 4		
<p>Only extracts /screenshots of MCERTS laboratory analysis are provided as part of quarterly return reporting.</p> <p>Recommendation 4. – Original laboratory results, ideally in PDF format, to be provided when submitting quarterly and annual return reports. Submission date deadline for quarterly returns is within 28 days of the end of each reporting period.</p>		