

# OMA Report – Emissions to Air – EPR

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| Summary sheet                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                |                                           |
| Permit Number: EPR/DP3735NP                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Compliance Officer: Kathryn Bradshaw                                                           |                                           |
| Operator: Biogen                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Auditor (if different):                                                                        |                                           |
| Emission Point(s): A1, A5                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Others Present: Technical Compliance Manager, Regional Compliance Manager, Environment Manager |                                           |
| OMA Sections                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                | SCORE                                     |
| OMA 1 – Management of monitoring                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                | 100%                                      |
| OMA 2 – Periodic monitoring and test laboratories                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                | 100%                                      |
| OMA 3 – Continuous monitoring                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                | N/A                                       |
| OMA 4 – Quality assurance                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                | 100%                                      |
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|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                | OVERALL SCORE                             |
| OVERALL SITE ASSESSMENT COMMENTS                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                | Letter                                    |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                | Variation                                 |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                | Enforcement                               |
| <p>The operator has 2 emission points with annual and 6 monthly monitoring required as detailed in table S3.1 in the site permit. The A1 emission point from the gas engine is monitored annually by an external contractor. The A5 emission point which controls emissions from the waste acceptance building and separator room is monitored 6 monthly by the companies Technical Competent Manager (TCM) who is MCERTS Level 2 accredited with extensive experience of manual stack monitoring. Samples taken by the TCM are sent to a MCERTS UKAS accredited laboratory for analysis.</p> <p>The operator has a management system accredited to ISO 14001 with specific procedures for monitoring and reporting which is managed centrally by the Compliance Team and communicated to relevant site staff. The operator complied with all monitoring standards and methods detailed in the permit. There is an error in the permit for the standard referenced for ammonia, BS EN 14791. The site is using the correct method, ISO EN 21877. The site uses the CEN TS 13649 (Charcoal tube) method for hydrogen sulphide monitoring as specified in the permit.</p> |                                                                                                |                                           |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                | Date of audit: 17 <sup>th</sup> July 2025 |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                | Signed: K. Bradshaw                       |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                | Date: 23/07/2025                          |

| OMA 1: Management of monitoring                                        |       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
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| OMA ELEMENTS                                                           | SCORE | COMMENTS                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| A. Documentation of management system procedures for monitoring        | 5     | Copy of Emissions monitoring procedure (V.11) was provided. Documents are controlled and available to all relevant personnel as part of ISO 14001 accredited management system. SSP for Alkali Environmental was provided plus written evidence of the SSP being reviewed.                                                                                                                                                                                                                                                                                                                                                               |
| B. Organisational structure for monitoring                             | 5     | Viewed company organogram. The Emissions Monitoring Procedure clearly details the roles and responsibilities for monitoring within the company. If the Technical Compliance Manager (TCM) is unavailable other members of the Compliance Team would cover the responsibilities of the monitoring.                                                                                                                                                                                                                                                                                                                                        |
| C. Schedules and planning of monitoring, including contingencies       | 5     | Monitoring is planned centrally by the TCM and the schedule shared to all sites. Weekly meetings are held between the Compliance Team and Operations where issues involving planned monitoring can be raised. Flares are monitored to ensure they are under the 10% usage, if they are over it will be flagged to the compliance team who will then add them to the monitoring schedule.<br>If the TCM is unavailable then external contractors are used for the A5 ammonia, hydrogen sulphide and odour testing. If there was an equipment failure during this testing, it would be rescheduled and disseminated to all relevant sites. |
| D. Monitoring records and use of monitoring data                       | 5     | Results of A5 emission point are regularly reviewed as this may indicate the carbon filter media may need changing. Results of A1 emission point are reviewed and procedures are in place to raise an Improvement Log if there were breaches of the permitted limits.                                                                                                                                                                                                                                                                                                                                                                    |
| E. Understanding the requirements of the permit and monitoring methods | 5     | The TCM is MCERTS Level 2 qualified with extensive knowledge and experience of the monitoring methods and permit requirements. Other members of the Compliance Team demonstrated good understanding of the permit and monitoring requirements.                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>OMA 1 – SCORE</b>                                                   | 25/25 | 100%                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |

## SUMMARY COMMENTS FOR OMA 1

The site has detailed procedures for the management of monitoring. The compliance team have extensive knowledge and experience of manual stack emission monitoring and permit requirements.

| OMA 2: Periodic monitoring and test laboratories            |       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
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| OMA ELEMENTS                                                | SCORE | COMMENTS                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| A. Sampling provisions                                      | 5     | Viewed both A1 and A5 sampling ports which comply with TGN M1. This is also detailed in the SSP for A1 emission point and the in-house testing of A5.                                                                                                                                                                                                                                                                                                                                                                                                  |
| B. Certification of equipment                               | 5     | Monitoring for the A1 emission point is undertaken by an external contractor whose equipment is MCERTS certified. Sampling for A5 emission point is undertaken by the TCM and samples sent to a UKAS accredited laboratory for analysis.                                                                                                                                                                                                                                                                                                               |
| C. Measurement methods and standards                        | 5     | The methods for A1 emission point listed in the permit are applied without deviation. However the method for ammonia for emission point A5, listed in the permit is BS EN 14791 which is incorrect. The site correctly uses EN ISO 218977 as referenced in guidance – Monitoring stack emissions: techniques and standards for periodic monitoring.<br>The method for Hydrogen sulphide for A5 listed in the permit is applied. The company also monitors odour from A5 although this requirement is not in the permit, it demonstrates best practice. |
| D. Calibration methods                                      | 5     | MCERTS accredited contractor is utilised to undertake required periodic monitoring for A1.<br>Calibration certificates were viewed for the pressure controller (Kimo MP210) and pump (SKC 220-4000) used for odour sampling.                                                                                                                                                                                                                                                                                                                           |
| E. Frequency of maintenance and calibration                 | 5     | MCERTS accredited contractor is utilised to undertake required periodic monitoring on A1.<br>Annual calibrations are conducted on equipment used for odour monitoring which is maintained and calibrated.                                                                                                                                                                                                                                                                                                                                              |
| F. Reliability of methods and equipment (data availability) | 5     | No issues requiring repeat sampling or analysis, reliability is >95%.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |

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| G. Breakdown response             | 5     | <p>MCERTS accredited contractor is utilised who are scheduled in for the whole year for monitoring of A1, providing enough time in case of breakdowns or machine failures.</p> <p>A5 emissions monitoring is scheduled well in advance and can be re-scheduled if equipment fails. Equipment will be sent for repair or replacements purchased.</p> |
| H. Traceability                   | 5     | <p>MCERTS accredited contractor is utilised to undertake required periodic monitoring for A1 and ISO 17025 laboratory used. Samples for A5 monitoring are sent to an ISO 17025 laboratory for analysis. Samples taken follow the correct methods.</p>                                                                                               |
| <b>OMA 2 – SCORE</b>              | 40/40 | 100%                                                                                                                                                                                                                                                                                                                                                |
| <b>SUMMARY COMMENTS FOR OMA 2</b> |       |                                                                                                                                                                                                                                                                                                                                                     |
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| 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      |
| <b>OMA 3 – SCORE</b>                                             | N/A   | N/A      |
| <b>SUMMARY COMMENTS FOR OMA 3</b>                                |       |          |
|                                                                  |       |          |

| OMA 4: Quality assurance              |       |                                                                                                                                                                                                                                          |
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| OMA ELEMENTS                          | SCORE | COMMENTS                                                                                                                                                                                                                                 |
| A. External quality control schemes   | 5     | ISO14001 accredited EMS covering monitoring provisions. Contractor holds relevant MCERTS and UKAS accreditations for analysis methods for A1. In house samples from A5 are sent to a UKAS accredited laboratory.                         |
| B. Internal data QC                   | 5     | Samples are sent off site for analysis to a UKAS accredited laboratory.                                                                                                                                                                  |
| C. Competence of monitoring personnel | 5     | Contractors are accredited to MCERTS Level 1 & 2. The companies TCM is Level 2 MCERTS accredited for testing of A5. If TCM was not available a suitably accredited contractor would be used for this testing.                            |
| D. Auditing of monitoring             | 5     | TCM audits the emissions contractors at least once per year which is saved on internal audit system.<br>Internal audit procedure – copy of procedure sent (V.15). Viewed a completed improvement log relating to an environmental issue. |
| E. Audit compliance                   | 5     | Activ system used for non-conformances. Raise improvements logs if any issues with monitoring. Compliance team also has weekly meetings with all site ops and issues can also be raised verbally.                                        |
| F. Reporting                          | 5     | The contents of the permit returns meets the permit requirements.                                                                                                                                                                        |
| <b>OMA 4 – SCORE</b>                  | 30/30 | 100%                                                                                                                                                                                                                                     |
| SUMMARY COMMENTS FOR OMA 4            |       |                                                                                                                                                                                                                                          |
|                                       |       |                                                                                                                                                                                                                                          |