


Summary sheet

Permit Number: EPR/NP3037AF	Compliance Officer: Stuart Ross	
Operator: Uniper UK Limited	Auditor (if different):	
Emission Point(s): CCGT A1 - A4 and Auxiliary Boilers A10A – A10E	Others Present: Andy Black (Uniper)	
OMA Sections	SCORE	
OMA 1 – Management of monitoring	93%	
OMA 2 – Periodic monitoring and test laboratories	100%	
OMA 3 – Continuous monitoring	97%	
OMA 4 – Quality assurance	93%	
	OVERALL SCORE	96%
OVERALL SITE ASSESSMENT COMMENTS	Letter	
	Variation	
	Enforcement	
<p>This OMA audit confirms that Uniper UK Limited continues to maintain appropriate monitoring arrangements, covering procedures, equipment, and personnel to ensure compliance with the requirements of the Environmental Permit.</p> <p>Since the previous OMA, conducted in December 2021, Uniper UK Limited has made significant investments in new duty and standby Continuous Emissions Monitoring Systems (CEMS) for each CCGT. The operator has also upgraded the Data Acquisition & Handling System (DAHS) and associated equipment, all in accordance with MCERTs standards.</p> <p>This audit also included, for the first time, an assessment of the periodic emissions monitoring for the five auxiliary boilers.</p>	Date of audit: 12/03/26	
	Signed: 	
	Date: 11/05/26	

OMA 1: Management of monitoring		
OMA ELEMENTS	SCORE	COMMENTS
A. Documentation of management system procedures for monitoring	4	The operator's EMS is accredited to ISO14001 and includes detailed and comprehensive procedures for air emissions monitoring with Local Management Instruction (LMI) 2014 and General Management Instruction (GMI) SHEQ 048 covering the majority of requirements including all aspects of EN14181. There have been updates to LMI 2014 to reflect the new Endress+Hauser SICK CEMS but there still some notable errors regarding references to the LAND instruments that require correction – refer recommendation below.
B. Organisational structure for monitoring	5	Procedure LMI 2009 details roles and responsibilities and an organogram is included within LMI 2014. Sufficient resources are in place for monitoring.
C. Schedules and planning of monitoring, including contingencies	5	A monitoring schedule is included in LMI 2014. Scheduling of monitoring and CEMS maintenance is managed through SAP reflecting the requirements of the permit. QAL 2 and AST testing are completed as required. SSP's are reviewed by Uniper prior to any monitoring campaign. However SSP sign off, such as a confirmatory email, could by not be evidenced during the OMA.
D. Monitoring records and use of monitoring data	5	Control charts are used to track data trends through Envirosoft data acquisition software, Monitoring data is reviewed at quarterly SHEQ meetings.
E. Understanding the requirements of the permit and monitoring methods	5	Staff have an excellent understanding of monitoring requirements and are suitably qualified and experienced in their roles.
OMA 1 – SCORE	24/25	93%

SUMMARY COMMENTS FOR OMA 1

Recommendation – Ensure a record is maintained to confirm SSP sign off by Uniper UK Ltd prior to each monitoring campaign and for any amendments made thereafter.

Recommendation – Sections 6.1.2.3 and 6.1.3 of procedure LMI2014 need to be reviewed and updated to refer to the Endress+Hauser SICK CEMS requirements opposed to the now decommissioned LAND CEMS.

OMA 2: Periodic monitoring and test laboratories		
OMA ELEMENTS	SCORE	COMMENTS
A. Sampling provisions	5	The sampling facilities for the five auxiliary boilers are safe and accessible, consisting of heated lines from each boiler exhaust to ground level sampling ports. Sample locations are labelled using internal nomenclature. No monitoring deviations recorded.
B. Certification of equipment	5	Monitoring is performed by an UKAS/MCERTS accredited test laboratory – Uniper Technologies Limited (UKAS 2200).
C. Measurement methods and standards	5	UKAS/MCERTS accredited for all parameters, no deviations, methods implemented as required by the permit.
D. Calibration methods	5	Calibration has been carried out under UKAS/MCERTS accreditation.
E. Frequency of maintenance and calibration	5	Maintenance and calibration has been carried out under UKAS/MCERTS accreditation.
F. Reliability of methods and equipment (data availability)	NA	Not assessed.
G. Breakdown response	5	Annual monitoring data is reported as required, no gaps in the monitoring record.
H. Traceability	5	Calibration has been carried out under UKAS/MCERTS accreditation.
OMA 2 – SCORE	35/35	100%
SUMMARY COMMENTS FOR OMA 2		
Recommendation – Label the auxiliary boiler sampling ports using the permitted emission point reference numbers as detailed in the permit.		

OMA 3: Continuous monitoring		
OMA ELEMENTS	SCORE	COMMENTS
A. Provisions for monitoring and location of continuous monitors	4	Unit 1 – 4 sampling facilities are safe. Platforms at the GT exhausts do not fully meet the requirements of TGN M1 due to their restricted size. However, as monitoring is only required for gaseous emissions the platform requirements are different from those of flow and isokinetic sampling. Testing to EN 15259 confirms the sample points are representative and fully compliant with the requirements of the standard. External stack platforms appear compliant with TGN1 but were not physically inspected due to access restrictions.
B. Certification of continuous monitoring	5	MCERTS certified Endress+Hauser SICK GmbH+Co. KG Power CEMS100 (GMS800) multi gas analysers installed on each gas turbine (duty and hot standby). MCERTS certificate no.MC100182/08. Dual redundancy Envirosoft CEMSuite V6.0 Data Handling and Acquisition System (DAHS), MCERTS certificate no. MC080130/05
C. Do not assess for air, water only	NA	Not applicable.
D. Calibration methods	5	CEMS calibrated in accordance with EN14181. Calibration functions entered correctly and up to date. QAL2 due 2026 and due to start imminently. CEMs subject to weekly QAL 3 checks in accordance with a written procedure.

E. Frequency of maintenance and calibration	5	QAL2 & AST history checked and completed in accordance with EN14181. QAL 3 completed weekly. A 5 year maintenance contract is in place with Endress+Hauser SICK. This includes a 6 monthly CEMS service.
F. Reliability of equipment (data availability)	5	CEMS are >99% reliable. Invalidation logs reported routinely as per permit requirements.
G. Breakdown response	5	Critical spares held on site. Call out contract with Endress+Hauser SICK. Hot standby CEMS and dual redundancy DAHS,
H. Traceability	5	QAL 2 and AST tests demonstrate traceability to national standards. In date span gases used for QAL3, sample of certificates inspected.
OMA 3 – SCORE	34/35	97%
SUMMARY COMMENTS FOR OMA 3		
<p>Recommendation – include a reference / link to the QAL3 procedure within LMI 2014.</p>		

OMA 4: Quality assurance		
OMA ELEMENTS	SCORE	COMMENTS
A. External quality control schemes	5	All monitoring activities are MCERTS certified. Uniper Technologies Ltd are UKAS accredited and participate in the NPL stack simulator proficiency scheme.
B. Internal data QC	5	CEMs data is reviewed using control charts and discussed at quarterly SHEQ meetings. The DAHS is MCERTS certified. Procedures detailed in LMI 3005 are used for reviewing the data and its integrity.
C. Competence of monitoring personnel	5	Uniper Technologies Ltd.'s personnel have appropriate MCERTS certification to the correct level and technical endorsements.
D. Auditing of monitoring	3	The operator does not currently have an audit plan for emissions monitoring, although an internal OMA was completed in 2024. No recent on-site auditing of monitoring completed by Uniper, for example of Uniper Technologies Ltd during monitoring campaigns.
E. Audit compliance	5	Where audit actions are identified they are logged and tracked, including at quarterly Management Review meetings.
F. Reporting	5	Monitoring data reporting is covered by procedure LMI 3005 CEMS emission data reports generated by Envirosoft. NRW has not observed any significant issues with routine reporting in terms of data quality and timing.
OMA 4 – SCORE	28/30	93%

SUMMARY COMMENTS FOR OMA 4

Recommendation – LMI3005 requires an update to include the CEMS data quality assurance checks conducted by Envirosoft prior to quarterly reporting to NRW.

Recommendation – Implement a written internal audit plan and complete periodic audits of emissions monitoring activities against relevant procedures and standards including the requirements of the environmental permit.