OMA Report – Emissions to Air – EPR

Summary sheet	
Permit Number: FP3031CW	Compliance Officer: Rick Prichard
Operator: FMC Agro Ltd	Auditor (if different):
Emission Point(s): A006	Others Present:

OMA Sections		SCORE
OMA 1 – Management of monitoring		64%
OMA 2 – Periodic monitoring and test laboratories		93%
OMA 3 – Continuous monitoring		N/A
OMA 4 – Quality assurance		77%
	OVERALL SCORE	78%

OVERALL SITE ASSESSMENT COMMENTS	
	Letter
	Variation
	Enforcement

Critical elements of the air monitoring process to satisfy permit conditions have been met, but written and auditable procedures for the monitoring and management of emission testing either need to be written or have not been submitted for this assessment.
To date, the monitoring and management of emission testing have been conducted by the MCERTS contractor with only their SSP and risk assessments supplied. Gaps in the operators role in this process are highlighted in the Actions listed below in OMA's 1,2 and 4.
The operators HSE 020 Environmental Monitoring Procedure document supplied, does broadly cover general procedures, and references Air Monitoring in Para 6.9 with regards to COSHH, and Para 6.10 in relation to the stack air monitoring itself, but does not mention any monitoring or auditing of this permitted process. It is disappointing to note that the same findings were made during the last OMA conducted in Dec 2021. The HSE 020 document version 7, dated 01/03/2022, does reference these findings as requirements, but they have either not been actioned or not submitted.

Date of audit:17/08/2026
Signed: 
Date:17/08/2026

OMA 1: Management of monitoring		
OMA ELEMENTS	**SCORE**	**COMMENTS**
A. Documentation of management system procedures for monitoring	3	The operator runs its own SAP/CMMS system which it audits internally. No audit evidence supplied. The system contains HSE 020-Environmental Monitoring Procedure. No operator sign off process/auditing of SSP/method statement prior to MCERTS monitoring taking place on site.
B. Organisational structure for monitoring	3	HSE 020 Section 5 Responsibility, details the responsibilities for EPR permitted monitoring.
C. Schedules and planning of monitoring, including contingencies	4	HSE 020 Section 8 Monitoring Plan, details what requires monitoring, the frequency and who is responsible, but does not mention anything on contingencies. This regime is also mirrored on the CMMS system.
D. Monitoring records and use of monitoring data	2	No formal procedure was supplied, but OMA 11A Management Review of 2025 Powerpoint, does review certain data,but with very narrow criteria, and not the monitoring data or activities.
E. Understanding the requirements of the permit and monitoring methods	4	The annual emissions testing is contracted out to a UKAS accredited laboratory (SOCOTEC). Any department working in a support context for this activity are mentioned in HSE 020. The operator demonstrated a good level of understanding of the permit monitoring requirements.
OMA 1 – SCORE	16/25	

SUMMARY COMMENTS FOR OMA 1

The operators chosen UKAS accredited lab suppy the operator with their monitoring SSP and method statement, but the operator does not have, or has not supplied, a sign off process or record to approve the testing activity prior to them attending site. A site risk assessment (FAE 021 A, dated 27th June 2025) has been supplied which does reference an SSP, but has been drafted by the UKAS accredited laboratory as a risk assessment for their testing activities. Evidence has been supplied of the testing lab's SSPs and method statements being provided to the operator before monitoring. The operator must review these documents for conformity to permit requirements. Once approved, they should be signed and dated by the operator, a copy retained for auditing and then returned to the contractor prior to monitoring commencing. In general, detail is light referring to monitoring being conducted by UKAS accredited contractors.

Action 1a: A written procedure for the audit of the MCERTS yearly testing must be established, including arrangements for data review and trending of monitoring data. The UKAS accredited contractor risk assessment and SSP mentioned above, should be referred to as part of the operators own monitoring procedure and risk assessment for the testing activity.
See also Action 1b in OMA 4 summary below.

OMA 2: Periodic monitoring and test laboratories		
OMA ELEMENTS	**SCORE**	**COMMENTS**
A. Sampling provisions	3	Location of sampling points, planes and ports enable testing to take place, but the UKAS accredited contractor highlight in their Emissions Monitoring Reports, that there is insufficient working room to conduct testing in a compliant manner. No evidence supplied of operator monitoring procedure or risk assessment for MCERTS monitoring activities on site.
B. Certification of equipment	5	UKAS accredited contractor carries out monitoring using certified instruments.
C. Measurement methods and standards	5	Contractor has MCERTs accreditation (Schedule of Accreditation supplied) for the relevant determinands and methods. A full stack emissions monitoring general method statement (MS 001 AM), was supplied from the operators chosen UKAS accredited lab.
D. Calibration methods	5	UKAS accredited contractor and contractor's equipment used.
E. Frequency of maintenance and calibration	5	UKAS accredited contractor used.
F. Reliability of methods and equipment (data availability)	N/A	
G. Breakdown response	N/A	
H. Traceability	5	MCERTS lab testing reports supplied.
OMA 2 – SCORE	28/30	
SUMMARY COMMENTS FOR OMA 2		
All monitoring is carried out by a contractor with MCERTs accreditation for relevant determinands and methods. Contractor's MCERTS certified instruments are used.		

Action 2: Consider extending the testing platform to allow the UKAS acrredited contractor the room needed to carry out testing in a safe and compliant manner. More information can be found in **BS EN 15259:2007** *Air quality. Measurement of stationary source emissions. Requirements for measurement sections and sites and for the measurement objective, plan and report.*

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	
OMA 3 – SCORE	N/A	
SUMMARY COMMENTS FOR OMA 3		
No continuous monitoring undertaken or required.		

OMA 4: Quality assurance		
OMA ELEMENTS	**SCORE**	**COMMENTS**
A. External quality control schemes	5	All monitoring activities are MCERTS accredited
B. Internal data QC	5	All monitoring activities are MCERTS accredited
C. Competence of monitoring personnel	5	MCERTS accredited contractor used.
D. Auditing of monitoring	2	An internal audit schedule for process auditing of ISO 9001 was supplied, but of the seven processes covered, none were attributable to the auditing of emissions monitoring.
E. Audit compliance	1	No evidence of approval/audit of SSP's and method statements prior to commencement of monitoring. No evidence of audit of contractors activity or equipment during monitoring events.
F. Reporting	5	Reporting of monitoring is evidenced in Section 7.1 of HSE020. Monitoring reports meet permit requirements and are submitted on time.
OMA 4 – SCORE	23/30	

SUMMARY COMMENTS FOR OMA 4

All monitoring activities are MCERTS accredited and carried out by a UKAS accredited contractor with monitoring reports submitted to the operator. The operator assesses the report in the site leadership team meeting and any issues arising from the report. There was no defined written procedure for review of air monitoring data, addressing issues or logging progress of actions supplied. These steps may occur across different systems within the operators EHS logging and compliance systems and processes, but there is no defined written procedure to control these activities.
There is no evidence of an onsite audit of the UKAS accredited contractor's equipment, methods or personnel during the monitoring event and no evidence of a formal written procedure for these auditable activities.

Action 1b: Establish a written procedure for auditing UKAS accredited contractors and their activities during monitoring events.