OMA Report – Emissions to Air – EPR

<table>
<tr><td colspan="4">Summary sheet</td></tr>
<tr><td>Permit Number: FP3031CW</td><td colspan="3">Compliance Officer: Paul Challender</td></tr>
<tr><td>Operator: FMC Agro Limited</td><td colspan="3">Auditor (if different): Paul Challender</td></tr>
<tr><td>Emission Point(s): A6</td><td colspan="3">Others Present: N/A</td></tr>
<tr><td colspan="3">OMA Sections</td><td>SCORE</td></tr>
<tr><td colspan="3">OMA 1 – Management of monitoring</td><td>64%</td></tr>
<tr><td colspan="3">OMA 2 – Periodic monitoring and test laboratories</td><td>93%</td></tr>
<tr><td colspan="3">OMA 3 – Continuous monitoring</td><td>N/A</td></tr>
<tr><td colspan="3">OMA 4 – Quality assurance</td><td>73%</td></tr>
<tr><td colspan="2"></td><td>OVERALL SCORE</td><td>77%</td></tr>
<tr><td colspan="3" rowspan="3">OVERALL SITE ASSESSMENT COMMENTS</td><td>Letter</td></tr>
<tr><td>Variation</td></tr>
<tr><td>Enforcement</td></tr>
<tr><td colspan="4">Air emissions monitoring is well managed but written procedures requiring improvement. All critical elements met, with air monitoring taking place as per permit conditions.

Management of monitoring is well controlled and implemented with actual monitoring being conducted by MCERTS contractors. Some formal specific written procedures are lacking as discussed below in OMA1, OMA2 & OMA4 and actions have been raised. It is accepted however, that procedures are generally established in practice being controlled and logged in various systems. A review of HSE020 Environmental Monitoring Procedure should be conducted. The Revision Log of HSE020 states a next review date of 11/12/2019 which, has passed.</td></tr>
<tr><td colspan="2" rowspan="3"></td><td colspan="2">Date of audit: 30/12/21</td></tr>
<tr><td colspan="2">Signed:</td></tr>
<tr><td colspan="2">Date: 31/12/21</td></tr>
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OMA 1: Management of monitoring		
OMA ELEMENTS	**SCORE**	**COMMENTS**
A. Documentation of management system procedures for monitoring	3	The operator is accredited to Green Dragon Level 4 for its EMS which, is also subject to an internal audit regime. EMS contains HSE020 – Environmental Monitoring Procedure. SSP not approved and dated by operator. Operator was initially unaware of the existence of the document.
B. Organisational structure for monitoring	2	HSE020 5.1 details responsibilities for EPR permitted monitoring but no delegate nominated. Section 5.1 also refers to *the monitoring plan in section 5.* This is incorrect the monitoring plan is located in Section 8
C. Schedules and planning of monitoring, including contingencies	4	Schedule in Section 8 Monitoring Plan is acceptable but there is no detail on contingencies. Requirements are also mirrored and flagged via the computerised CMMS maintenance planning system.
D. Monitoring records and use of monitoring data	3	There is no formal procedure, however the EHS manager will assess the Socotec report, and the results are discussed at the site leadership EHS meeting.
E. Understanding the requirements of the permit and monitoring methods	4	MCERTS work is contracted out to MCERTS contractors. Staff with specified roles within HSE020 are aware of their documented responsibilities.
OMA 1 – SCORE	16/25	

SUMMARY COMMENTS FOR OMA 1
Although an SSP has been provided to NRW the document was not readily available. The operator was unaware of an SSP and the operator had to request a copy from the MCERTS contractor. The provided SSP is not signed and dated by the operator. SSPs should be provided to the operator before monitoring. The operator must review the SSP for conformity to permit requirements. Once approved, it should be signed dated by the operator and returned to the contractor prior to monitoring commencing. In general, detail is light referring to monitoring being conducted by MCERTS accredited contractors without reference to alternate providers if/when required. **Action 1:** A written procedure for the audit of the yearly SSP must be established. A written procedure for data review and trending of monitoring data must be established.

OMA 2: Periodic monitoring and test laboratories		
OMA ELEMENTS	**SCORE**	**COMMENTS**
A. Sampling provisions	3	Location of sampling points, planes and ports are suitable and safe. Port is covered outside of sampling events with tape. Tape had either not been reapplied post-sampling or had become detached.
B. Certification of equipment	5	MCERT contractor carries out monitoring using certified instruments
C. Measurement methods and standards	5	Contractor has MCERTs accreditation for the relevant determinands and methods.
D. Calibration methods	5	MCERTs accredited contractor and contractor's equipment used
E. Frequency of maintenance and calibration	5	MCERTs accredited contractor used
F. Reliability of methods and equipment (data availability)	N/A	
G. Breakdown response	N/A	
H. Traceability	5	
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. As A6 is not suitable for a permanent sampling platform a scaffold is used under agreement and is provided by a site scaffolding contractor. During the physical inspection the port covering was not present. The inspection port should be regularly inspected to ensure integrity.

Action 2: Investigate alternate inspection port seal and establish a written procedure for a regular integrity check of inspection port cover

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.		

Cyfoeth Naturiol Cymru Natural Resources Wales

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	1	CORP-02 covers general auditing of EHS practices at FMC's global sites. No specific procedure for the audit of monitoring equipment and practices during monitoring events.
E. Audit compliance	1	No evidence of audit of SSP prior to commencement of monitoring. No evidence of audit of contractors or equipment during monitoring events.
F. Reporting	5	Reporting of monitoring is specifically controlled by Section 7.1 of HSE020. Monitoring reports meet permit requirements and are submitted on time.
OMA 4 – SCORE	22/30	

SUMMARY COMMENTS FOR OMA 4

All monitoring activities are MCERTS accredited and carried out by a MCERTS contractor with monitoring reports submitted to the operator. The operator assesses the report in the site leadership team meeting and assesses any issues arising from the report there is, however, no defined written procedure for review of data, addressing issues or logging progress of actions. These steps can occur across different systems within the operators EHS logging and compliance systems and processes, but a defined written procedure does not control these activities.

There is no evidence of an onsite audit of MCERTS contractor's equipment, methods or personnel during the monitoring event and no evidence of a formal written procedure for these audit activities.

Action 3: Establish a written procedure for auditing of MCERTS contractors and their activities during monitoring events.