

Preparing for an OMA audit – Guidance for Operators

Introduction.

Using our Operator Monitoring Assessment (OMA) scheme, we assess the quality and reliability of an operator's self-monitoring. As well as assessing compliance with the monitoring requirements of an operator's permit, we also identify opportunities for improvement. This guidance explains the process and how operators can prepare for an OMA audit using version 4 of the OMA instruction manuals.

Is more detailed guidance available?

Yes - we have produced instruction manuals that describe the OMA audit-process. Copies of these manuals are available via our web site at www.mcerts.net

The OMA scheme covers assessments of operators' self-monitoring of both emissions to air and discharges to water. Separate instruction-manuals are available for each of these.

Who will be audited?

We carry out OMA audits on operators with Installations regulated under the Environmental Permitting (England and Wales) Regulations, 2016.

What is involved in an OMA audit?

The Environment Agency's EPR-Installations officers doing the OMA audit will interview relevant site personnel, view appropriate documentation and inspect the monitoring equipment and provisions. The officers record the information and the data that reflects the quality and reliability of operators' self-monitoring and associated issues. The operator will have the opportunity to contribute to this process.

What will the OMA audit be used for?

We use the results of the OMA audits to:

- assess an operator's self-monitoring (including monitoring undertaken on behalf of the operator by contractors)
- indicate necessary improvements to monitoring
- prioritise and target our more detailed auditing of monitoring provisions and procedures, when an OMA score shows a need for this

What can I do in advance of the OMA audit?

Planning and preparing for the OMA audit will help to ensure that it is carried out both effectively and efficiently. We want the OMA audit to provide an accurate representation of the standard of self-monitoring. It is in the operators' interest for the OMA audit to accurately reflect their current monitoring situation.

What actions can I take to make the OMA audit run smoothly?

Read the OMA version 4 instruction manuals.

The OMA version 4 instruction-manuals and associated guidance are available via www.mcerts.net

Each of the two manuals identifies the areas of examination for the audit. Our officers will use these instructions manuals when performing the OMA audits. Understanding the requirements and guidance before the OMA audit provides an opportunity for operators to prepare effectively and become familiar with the OMA process.

Ensure that documents and records are available and up to date.

It will save time during the audit if relevant documents are to hand. A list of relevant documents is attached.

Ensure that documents are dated and signed.

Some documents require regular updating to ensure that they are still valid, for example training or calibration records.

Check that audit trails are available.

It is important to be able to identify, for example, who undertook monitoring, when it was carried out and what equipment/methodology was used.

Provide evidence of good practice.

If there are examples of good practice, for example, meetings to brief process-operatives on monitoring trends, then make them available.

Ensure the right people are available.

This will vary from process to process. If a specific manager is responsible for monitoring, then he/she will be an appropriate person to attend the entire OMA audit. Monitoring team members/personnel familiar with the location of authorised emission points and fixed emission monitors should be available during the OMA audit.

Provide evidence of intended actions.

If, for example, new monitoring equipment is on order or the site is committed to ordering new monitoring equipment, then evidence of this should be available.

Undertake an internal audit.

Carrying out an internal audit using the latest version of the OMA guidance will help to identify monitoring issues needing potential improvement. It may be possible to complete these improvements in advance of the OMA audit.

Where can I get more information or advice?

www.mcerts.net

Documentation checklist for OMA audit

The following documents should be available during the OMA audit

- Company organogram and details of relevant post responsibilities, specifically those that relate to monitoring.
- Copy of the permit, monitoring returns and monitoring schedules.
- Recent emission monitoring reports, including those from external contractors.
- Management system reviews relevant to monitoring.
- Details of any accreditation, certification and type-approvals, for example, UKAS schedules (includes laboratories), MCERTS, ISO9001, ISO14001.
- Copies of internal and external audits in respect to monitoring.

The following documents may also need to be available during the OMA audit

Note: some of the documents listed below may not be required. For example, it is not necessary to look at some documented procedures, if the monitoring has third party verification by UKAS.

- Copies of monitoring procedures and methods employed, including those for work carried out by monitoring contractors.
- Performance and validation data for methods used, for example, limits of detection, linearity, operating ranges etc. This would include surrogate methods, for example, mass balances.
- Training records and professional developments logs for all personnel involved in monitoring.
- Calibration and maintenance procedures.
- Calibration and maintenance records and schedules.
- Monitoring equipment instruction manuals and performance data.