

Operator Monitoring Assessment (OMA-3)

The Environment Agency has recently introduced many changes to the current UK environmental legislation. The IPPC (Integrated Pollution, Prevention & Control) regulation has now been superseded by EPR ((Environmental Permitting Regulations) and existing permit holders must now comply with this standard. The latest document OMA version 3 was published during April 2009 and is effective for the Industrial Sector May 2009 and the Water Sector during October 2009.

OMA was initially introduced for Part A processes regulated under the IPC regulation during 2001 and subsequently revised during 2003; so many operators (principally within the industrial sector) will be familiar with this point scoring system which has specifically addressed stack gas emissions. However OMA has now been extended to include water-borne emissions and consequently whilst the same principles apply, all Operators must now for the first time consider their regulated water discharges in the context of this regulation.

Many Operators especially those within the Water Sector may not have encountered OMA previously and will not therefore fully appreciate the implications and the requirements of the introduction of the OMA-3 for regulated water discharge(s).

In principle the regulation enables an Operator to be audited by the Environment Agency to attain confidence and promote continual improvement. The audit is typically performed during a single day and all requested documentation must be provided to the Agency during the site inspection. Failure to provide adequate data would adversely affect the points scored for a given category.

There are four sections to OMA-3 and each one of these is split into sub-sections or elements.

- OMA section 1 covers management, training and the competence of individuals.
- OMA section 2 assesses whether instrumentation is fit for purpose.
- OMA section 3 considers maintenance and calibration of instrumentation.
- OMA section 4 test the quality assurance of the monitoring systems.

The scoring for each element is assigned a value between 1 and 5 where 3 is deemed acceptable and 5 is the best possible result. The average is calculated for each section and then the mean of all four sections is reported as the overall OMA score for the Operator.

The minimum frequency for the audit is four years although where improvement has been specifically identified or where the overall score is considered too low, improvement notices may be served on the Operator and the improvement schedule would be monitored. In extreme cases, “check monitoring” may be imposed where the

Agency would instruct an independent contractor to perform a program of discrete sample collection and analysis, at the Operator's own cost.

OMA section 2 has specific implication as this considers whether the instrumentation installed is "fit for purpose". This section is split into five individual elements:

- Sampling.
- Measurement technique.
- The use of relevant methodology.
- MCERTS.
- The performance characteristics of the method.

Only instrumentation which has been awarded MCERTS accreditation would attract the top score of 5 for this category as this would be deemed the "best available technique" that has been shown to be "fit for purpose". The Protoc 300 TOC analyser which is predominantly installed for industrial applications (discharge and product loss) has been certified to MCERTS to ensure that Operators may achieve a top score.

Discussions with the Agency have highlighted the need to fully consider all individual elements before the audit takes place. For example, the Sampling element would consider whether the sampling point for a discharge is representative. It would therefore be important to consider for all the critical, high risk discharges and whether the sampling/monitoring point is correctly positioned to obtain a representative sample. Failure to comply in all locations would attract the lowest score i.e. at element level the lowest score is applied and not the average. Consequently the scoring for only one discharge position out of many, could seriously damage the overall score!

Eventually, the OMA score will be used to determine how much the Agency will charge the Operator for a license to operate, so ultimately will also directly financially impact.

[Operator Monitoring Assessment](#)

[Presentation of MCERTS certificate to PPM for Protoc 300 TOC](#)

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