OPERATOR MONITORING ASSESSMENT

SUMMARY SHEET
DISCHARGES TO WATER SUBJECT TO OPERATOR SELF MONITORING AND URBAN WASTEWATER TREATMENT DIRECTIVE SELF MONITORING

Operator: United Utilities	Assessing officers: [redacted] Others Present: [redacted]	
OMA Sections		SCORE(S)*
OMA 1 - Management, training and competence of personnel		100
OMA 2 - Fitness for purpose of monitoring methods		96
OMA 3 – Maintenance and calibration of monitoring equipment		100
OMA 4 – Quality assurance of monitoring		92
	OVERALL SCORE(S)*	97%
OVERALL ASSESSMENT COMMENTS		

This audit was conducted on a newly implemented system. This means that there is little practical evidence to challenge the application of the procedures. What little evidence there is, based on one site inspection and two sampler field audits, is encouraging and it is hoped the high standards generally found will be maintained for a full evaluation in 2011.

The score of 97% is extremely high, a score of 60% being a satisfactory level, and reflects the comprehensive nature of the documentation and the planning that has gone into developing the programme. Overall this is impressive. It also reflects the very clear separation between the monitoring programme and the operations teams which is exemplary.

Practical experience of the implementation over the next 12 months, including routine data reporting, response to any problem sites etc. will give a more rigorous test of the system. The challenge is to maintain the high standards displayed so far and to ensure that the minor issues raised in the main report are addressed in a timely fashion.

Date of assessment: 29/04/10
Signed: [redacted]
Date: 05/05/2010

OMA REPORTS – discharges to water subject to Operator Self Monitoring and Urban Wastewater Treatment Directive self monitoring

OMA 1: Management, training and competence of personnel

Operator: United Utilities   Date: 29 April 2010

OMA ELEMENTS	SCORE	COMMENTS
A. Management structure	5	Well defined and documented. Clear separation between monitoring and operations. Clear responsibilities of staff with well defined deputies/cover. Overseen by Managing Director.
B. Schedules	5	Well documented process for scheduling of samples and identifying need to resample or amend sampling rate.
C. Use of results	5	Results reported to all levels of management and operations. Contribute to regular (weekly) risk assessments.
D. Understanding of requirements.	5	Clear training programmes for monitoring staff. Competence supported by (limited) site inspections.
E. Competence of personnel	5	MCERTS applies from 1 June 2010. Until then covered by ISO17025.
OMA 1 – SCORE	100%	

SUMMARY COMMENTS FOR OMA 1

There is strong evidence that United Utilities have developed comprehensive processes and procedures for OSM. There is less strong evidence for implementation as the scheme has only been operating for 4 months, albeit there are no obvious, significant issues so far.

There is very limited information from site visits, but this does tend to confirm effective implementation.

We were impressed by the separation of the monitoring programme from the operational staff and would suggest this is an example of good practice.

OMA REPORTS – discharges to water subject to Operator Self Monitoring and Urban Wastewater Treatment Directive self monitoring

OMA 2: Fitness for purpose of monitoring methods

Operator: United Utilities | Date: 29 April 2010

OMA ELEMENTS	SCORE	COMMENTS
A. Sampling facilities	4	Marked down on the basis of one site visit that revealed partial obscuration of the official sampling point sign due to mossy growth.
B. Measurement techniques	5	Subject to MCERTS from June 2010. Already subject to ISO 17025
C. Use of relevant methods	5	Subject to MCERTS from June 2010. Already subject to ISO 17025
D. Certification of equipment	5	Subject to MCERTS from June 2010. Already subject to ISO 17025
E. Performance characteristics of the method	5	Subject to MCERTS from June 2010. Already subject to ISO 17025
OMA 2 – SCORE	96%	

SUMMARY COMMENTS FOR OMA 2

The majority of this section is covered by MCERTS which will be effective from 1 June 2010.

Prior to that date, ISO17025 applies.

The issue with the sampling point sign is based on one site visit. The signs themselves are large and apparently clear. They have also been equipped with electronic tags so that samplers will be able to verify they are at the correct place. This will feed into a fully electronic recording system in the near future. The problem with this particular sign at Chorley was that mossy growth had partially obscured it and the sampler(s) had not addressed the issue by cleaning it or reporting it to operations staff..

This is an issue that needs to be kept under review in the future and confirmation that the situation at Chorley has been addressed, and samplers advised of the need to be vigilant about signs should be provided to the Environment Agency by the end of May 2010.

OMA REPORTS – discharges to water subject to Operator Self Monitoring and Urban Wastewater Treatment Directive self monitoring

OMA 3: Maintenance and calibration of monitoring equipment		
Operator: United Utilities		Date: 29 April 2010
OMA ELEMENTS	**SCORE**	**COMMENTS**
A. Documentation of maintenance and calibration procedures	5	Subject to MCERTS from June 2010. Already subject to ISO 17025
B. Frequency of maintenance and calibration	5	Subject to MCERTS from June 2010. Already subject to ISO 17025
C. Equipment reliability	5	Subject to MCERTS from June 2010. Already subject to ISO 17025
D. Breakdown response	5	Subject to MCERTS from June 2010. Already subject to ISO 17025
E. Traceability.	5	Subject to MCERTS from June 2010. Already subject to ISO 17025
F. Acceptability of calibration methods	5	Subject to MCERTS from June 2010. Already subject to ISO 17025
OMA 3 – SCORE	100%	

SUMMARY COMMENTS FOR OMA 3
Section entirely covered by MCERTS/ISO17025.

OMA REPORTS – discharges to water subject to Operator Self Monitoring and Urban Wastewater Treatment Directive self monitoring

OMA 4: Quality assurance of monitoring		
Operator: United Utilities		Date: 29 April 2010
OMA ELEMENTS	**SCORE**	**COMMENTS**
A. Documentation of monitoring procedures	5	Good documentation presented
B. Quality control schemes	5	Fully covered by MCERTS
C. Auditing of monitoring	4	The whole of the scientific services team is audited with a rolling 5 year programme. Currently there is no self audit process for OSM and this has been suggested as best practice. UU to establish for future.
D. Audit compliance	5	Clear records of issues arising from existing internal audits and their resolution.
E. Reporting	4	Reporting is taking place as per the requirements. However, it can take up to 5 working days for non-compliant samples to be reported. This does not appear to be in the spirit of "as soon as is reasonably practical". It is noted that UU operations are automatically notified immediately a non-compliant result is available. UU should consider including the Environment Agency in this service (DEFRA guidelines for UWWTD sample failure reporting specify "immediate")
OMA 4 – SCORE	92%	

SUMMARY COMMENTS FOR OMA 4

Most of the requirements for OMA4 are covered by the MCERTS certification. The minor improvements to self auditing and result reporting suggested above would enhance the process.