

Text of Notification to all licensees on air emissions monitoring as issued on 21 December 2010

RE: Minimum Standards for Air Emissions Monitoring at IPPC and Waste Sites

Note: This is an important EPA notification, please read this correspondence in full.

This correspondence is a follow up to the Industrial Air Emissions Conference held by the EPA on October 7th 2010. The presentations (video recording and PowerPoint presentations) from this event are now available for viewing at the following website:

<http://www.epa.ie/downloads/videos/industrialairmissionsconference/#d.en.30486>.

In addition, the EPA website also now has a specific section with a range of practical guidance on the subject of environmental monitoring, including a range of air emissions monitoring issues such as contractor accreditation, continuous monitoring systems, monitoring standards, guidance documents and standardisation of emissions data. This information is available at:

<http://www.epa.ie/whatwedo/advice/envmon/>

A number of air monitoring guidance notes have also been released in 2011, including:

- AG4 – Air Dispersion Modelling;
- AG5 – Odour Impact Assessment Guide for EPA licensed Sites;
- AG6 – Surface VOC Emissions Monitoring at Landfill Sites.

All air guidance notes are available at:

<https://www.epa.ie/downloads/advice/air/emissions/>

We would encourage licensees to review these documents as part of the development of their own emissions monitoring programmes. Any comments in relation to the EPA air conference or the web pages can also be submitted to the Office of Environmental Enforcement Air Enforcement Team (e-mail: airthematic@epa.ie).

As part of the Office of Environmental Enforcement site inspection and audit work programme, the office is continuing previous work aimed at ensuring the quality of self-monitoring data submitted to the Agency from licensed sites. This correspondence relates specifically to requirements in relation to monitoring of emissions to atmosphere (typically from point sources). The aim of this correspondence is to provide some clarification of the monitoring competency requirements specified in licences, typically using wording such as:

- 6.1 *The licensee shall carry out such sampling, analyses, measurements, examinations, maintenance and calibrations as set out below and as in accordance with Schedule C: Control & Monitoring, of this licence.*
- 6.1.1 *Analyses shall be undertaken by competent staff in accordance with documented operating procedures.*
- 6.1.2 *Such procedures shall be assessed for their suitability for the test matrix and performance characteristics shall be determined.*
- 6.1.3 *Such procedures shall be subject to a programme of Analytical Quality Control using control standards with evaluation of test responses.*
- 6.1.4 *Where any analysis is sub-contracted it shall be to a competent laboratory.*

This licence condition makes a number of references to ‘competency’. Licensees must maintain documentation to demonstrate the competency of the companies and individual personnel involved in carrying out monitoring of emissions to atmosphere from the site.

Where a licensee uses a contractor accredited to the ISO 17025 standard (specific to air emissions monitoring and to the parameters being monitored), then the licensee is normally deemed to have complied with the competency requirements of the licence. Documentary evidence of the accreditation status of the contractor must be maintained by the licensee and made available for inspection by the EPA. It should be noted that the monitoring organisation itself must be accredited, it is not sufficient to have individual personnel who have attained a specified personal competency level (e.g. MCERTS personnel certification).

Where a licensee employs a non-accredited contractor or where monitoring is carried out by in-house personnel, the following must be met to demonstrate competency:

- The minimum benchmark required at present to meet the licence monitoring competency requirements is compliance with the general requirements of EPA Air Monitoring Guidance Note AG2. Where monitoring and reporting does not substantively meet the best practice requirements in AG2, the reports may be rejected and the licensee will be requested to repeat the work to the required standard. As per AG2, the following areas are required to be addressed:
 - Evidence of proper planning and consideration of other factors affecting the monitoring process (Chapter 4 of AG2);
 - Development of a Site Specific Protocol (SSP) setting out the monitoring, methodology, and equipment to be used in the air monitoring programme;
 - Use of appropriate equipment and appropriate management of equipment (Chapter 6 of AG2);
 - Competency, experience and training history of personnel carrying out monitoring;
 - Organisational systems and work practices, including a quality management system, technical procedures, etc. (Chapter 8 of AG2);
 - Use of standard methods (Chapter 9 of AG2);
 - Reporting of monitoring results (Chapter 10 of AG2).

- Personnel competency records must include full details of all relevant training and practical experience of the personnel carrying out the monitoring, including training, experience and knowledge for each of the monitoring techniques employed at the installation.
- Organisational competency must include details of the QA/QC procedures applied by the contractor, in-house technical procedures, health and safety procedures and procedures for developing site specific protocols. The Agency may require copies of such procedures and failure to hold documentary evidence of contractor competency may result in non-compliance notifications, and requests for repeat monitoring, as necessary.

Reports may be reviewed as part of EPA inspections/audits, or alternatively the EPA may request licensees to submit emissions monitoring reports to the EPA in cases where the licensee does not routinely submit such reports.

The following requirements in relation to submission of the Annual Environmental Report (AER) should be noted:

- Where a licensee is using accredited contractors the details of the contractor must be submitted in the AER along with their accreditation status;
- Where a licensee is using a non-accredited contractor, more detailed information will be required in the AER in relation to the competency of the personnel and organisation carrying out the emissions monitoring, including competency specific to the type of monitoring carried out at your site (e.g. particulates, VOCs, acid gases)

The following requirements are also to be applied to all sites in 2011 regardless of whether accredited or non-accredited monitoring is being carried out, though application to non-accredited monitoring is more likely:

- The EPA may request advance notification of the proposed date of periodic licensee monitoring of air emissions, and may audit the on-site monitoring element of this periodic monitoring.
- The findings of these audits will be reported to the licensee and where the monitoring does not substantively meet the best practice requirements of AG2 (or ISO17025 for air emissions monitoring), the licensee will be required to repeat the monitoring to the required standard.

Any failure to comply with these requirements may be subject to further enforcement action by the Agency. If you have any queries in relation to this matter please contact your OEE inspector or the EPA Air Enforcement Team.

Where a licensee has demonstrated compliance with the competency requirements, or where an ISO17025 accredited contractor is being employed, this is likely to be of assistance in any licensee requests for reduction in frequency or scope of emissions monitoring, however all such requests are subject to assessment by the OEE.

Any future information with regard to the minimum competency requirements for licensee self-monitoring will be notified to all licensees by correspondence (including e-mail) or via the web pages on emissions monitoring (as referenced above).

Yours sincerely

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