



## LMA/ALDER Update for IPPC/IPC, IE and Waste Licensees – May 2014

### What's Been Happening in LMA?

The LMA application was launched via the ALDER portal on 21<sup>st</sup> January 2013. This update follows the update of September/October 2013. Since then a number of changes to the LMA and ALDER/EDEN view pages have been developed and have recently been introduced and are discussed in the 'Recent Developments' section of this update. You can also find out about future developments in the 'What's Next in LMA?' section of this update.

### Brief summary of activity on LMA (IPPC/IPC, IE and Waste Licences) for the first three months of 2014:

- The EPA received a total of 1,702 licensee returns of which 714 have been monitoring returns, 453 site updates/notifications and 436 requests for approval.
- A total of 525 incidents were notified to the EPA of which 259 related to a breach of an ELV and 93 to a trigger level being breached.
- 53 Compliance Investigations were opened by the EPA such that as of 31<sup>st</sup> March 2014 the EPA had 286 open Compliance Investigations. The predominant likely cause associated with these compliance investigations is 'inadequate operational procedures/training', with 81 investigations associated with this likely cause.

### Key points to note when interacting with the EPA via LMA:

- ✓ Relevant guidance and information for licensees in relation to LMA/ALDER is available on the EPA ALDER web pages at <http://www.epa.ie/enforcement/alderhelp/>, including a FAQ section and other useful references. Licensees should consult this resource prior to contacting the ALDER support helpdesk at [aldersupport@epa.ie](mailto:aldersupport@epa.ie).
- ✓ A significant number of e-mails to the ALDER/EDEN helpdesk relate to problems with new users gaining access to ALDER/LMA and to the relevant licence within LMA. A detailed description of how this process should be carried out is available on the ALDER support page at: <http://www.epa.ie/pubs/advice/lema/lmaguidanceforapprovalprocess.html>. Please consult this before contacting the helpdesk.
- ✓ Each licensee can have up to three contacts who receive notifications from the EPA, known as the OEE primary, secondary and tertiary contact. These contacts are controlled by the EPA. But a licensee can change the nominated contacts by submitting a site update (licensee return) via LMA. You can have other people as users of LMA who can submit licensee returns, etc., **but only these three nominated people will receive notifications when the EPA contacts the licensee via LMA** (e.g. when a CI action is issued, or a request for information is sent in relation to a licensee return). **It is very important that licensees keep these contacts up to date by notifying the EPA immediately of any required changes.** Note that you can now view the details of these contacts through the new 'View Site Contacts' button on your licence page. All licensees are advised to check their contacts and submit any changes to primary, secondary or tertiary contacts as necessary.

- ✓ Within compliance investigations (CIs) there are two mechanisms which the EPA can use to request information/actions from licensees. The first of these is a CI Action which formally requires the licensees to respond to the CI Action with the requested information. The second mechanism is a 'CI Instruction' which is direct instruction to the licensee which does not require a response to the EPA. While these CI Instructions will arrive in LMA with a status of 'closed', **it is important that licensees review all CI Instructions and carry out any activity which may be required. CI Instructions are likely to be checked as part of site visits by the EPA.**
- ✓ There are a number of Microsoft Word template documents available in ALDER/EDEN for making certain licensee returns. These are available when you open the 'Manage Licensee Returns' and 'Make a Licensee Return' buttons on the ALDER/EDEN licence page. Filling out the relevant document fully as part of the licensee return will reduce the likelihood of additional requests for information from the OEE.
- ✓ Any data which you submit to the EPA will immediately go up on the electronic public file which is available in each of the regional offices (with the exception of financial provision documents and some complaint related documents). If you wish to submit confidential information to the EPA you must do this via the post and not initially submit the data to the Agency via ALDER/EDEN. An overview of how confidential information should be submitted is available on the ALDER business support page at: <http://www.epa.ie/pubs/advice/lema/howtomanageconfidentialenforcementsubmissions.html>.
- ✓ When reporting ELV breaches as incidents you should ensure that when selecting the receptor that you select the relevant media to which the release occurred. Generally you should not select 'no uncontrolled release' as the receptor type where an ELV breach has occurred.

**Incident nature\***

☐ Explosion  
☐ Fire  
☐ Spillage  
☐ Odour  
☒ Breach of ELV  
☐ Monitoring Equipment offline  
☐ Trigger Level Reached  
☐ Uncontrolled Release  
☐ Other

**Impact of Incident on Environment\* [?]**

**Uncontrolled release to receptors\***  
*Select all that apply*

☐ Air  
☐ Sewer  
☒ Water  
☐ Ground  
☐ No Uncontrolled Release

### **Recent Developments in LMA?**

A number of changes/updates have been developed and recently incorporated into the LMA and ALDER/EDEN view pages in order to make it more user friendly. While some changes were minor below is a summary of the main changes/updates:

- A large number of licences were technically amended in January of this year to bring the licences into line with the requirements of the Industrial Emissions Directive (IED). These licences are now referred to as Industrial Emission licences. Note that not all EPA licensed activities are subject to the requirements of the IED, and those that are not subject to the IED were not technically amended in January. These technically amended licences require that ALL non-compliances are notified to the EPA. This was not previously the case and there was scope

for minor non-compliances to be noted on site without the need to report to the OEE. The majority of non-compliances will be notified to the OEE as part of incident reports, however to accommodate reporting of minor non-compliances which are not incidents we have added an additional licensee return sub-type. This sub-type of 'report non-compliance' is available under the return type of 'requests for approval and site reports' as illustrated below. **N.B. this is only relevant to licensees who have Industrial Emissions licences and is only for reporting of non-compliances which are not reportable as incidents.** A detailed circular on the impact of the IED on compliance/enforcement activities will be circulated shortly.

- On the Licence page for a facility there is an option to select 'View Site Contacts' which lists the various contact names and associated contact types;
- There is a new grid format in pages listing Complaints, Licensee Returns, Incidents, Non-Compliances and Compliance Investigations. These grids will include additional information such as Licence Reg. No., Notification Ref., date of issue, etc. These grids have functionality for searching, filtering and sorting. Other details as appropriate are provided in grids for individual modules e.g. in 'Manage Incidents' there are columns for 'Incident Nature' and 'Incident Date';
- Similarly in the grid in the 'My Notifications' section additional columns have been added to provide for Licence Reg. No., Notification Ref. and date of issue;
- In the modules for Complaints, Licensee Returns, Incidents, Non-Compliances and Compliance Investigations there are details regarding any specific links with other modules e.g. where a specific Licensee Return is linked to a specific Compliance Investigation the licensee will be able to see this link in the pages for the Licensee Return and Compliance Investigation;
- Template documents located in ALDER/EDEN for making Licensee Returns which were available when you clicked open 'Manage Licensee Returns' are now also available when you click open 'Make a Licensee Return' (this is also discussed in 'Key points to note' section above);
- As referred to earlier there are occasions when an error may occur when a licensee attempts to submit a return to the EPA via ALDER/EDEN e.g. a Licensee Return. Error messages have been included to highlight specific reasons for the error in the case of the following:
  - ✓ If a required field is left blank;
  - ✓ Where attached documents have very long file names or file names that include any of the following characters: # % & \* : < > ? / { | };
  - ✓ Where any file types are in a format not allowed in ALDER, the following are the list of allowed file types for EDEN/ALDER: 'pdf', 'png', 'jpeg', 'jpg', 'gif', 'tif', 'tiff', 'docx', 'doc', 'xls', 'xlsx', 'avi', 'mkv', 'mp4';
  - ✓ In addition to avoid errors regarding too much text being entered there are visible limits set in the 'subject heading' and 'details sections of 200 and 2000 characters respectively.

- ✖ If documents are attached that are over 10MB the submission will fail. At the moment no error message is included for this situation. If a submission is failing and you have included an attached review and ensure that the document is less than 10MB;
- In a Compliance Investigation page the reference number of CI Actions/Instructions is viewable;
- In the 'View EPA Reports' page reports can be sorted in date order.

### What's Next in LMA?

The EPA is currently developing additional functionality in LMA to assist with the completion of site visit and the associated reports. It is anticipated that this will link more closely the outcome of inspections with compliance investigations and non-compliances and make it easier to track the outcomes of site visits.

A new section is now available on LMA/ALDER which displays site visit information; this section contains a list of site visits and a link to the associated site visit report.

In the event of the Agency intending to conduct an announced site visit, you will receive an email informing you of same and the visit and scheduled date will appear in this section. Please note that the majority of EPA site visits are unannounced.

### **View of Site Visits for Licence**

The screenshot shows the 'View of Site Visits for Licence' page. At the top, there is a navigation bar with links: Licences, My Notifications, Manage My Users, and Help. Below this is a header section with the text 'All Site Visits associated with Licence:' followed by a yellow box containing the text 'Name of Facility will show here'. Below the header is a breadcrumb trail: Home >> All Licences >> Reg. No. (Details) >> Site Visit List. A 'LOG OFF' link is visible in the top right corner.

The main section is titled 'Completed Site Visits'. It features a table with the following columns: Site Visit Number, Actual Visit Date, and Report Issued Date. The table contains 9 entries. The first entry is SV00790 with an actual visit date of 27/02/2013. The second entry, SV00822, is highlighted in yellow and has a 'Report' link next to it. The third entry is SV00823 with an actual visit date of 12/03/2014 and a report issued date of 13/03/2014. The remaining entries are SV00833, SV00838, SV00852, SV00853, SV00871, and SV00902, all with actual visit dates in March 2014 and report issued dates in March 2014. Each of these entries has a 'Report' link next to it.

Below the table, there is a footer section with the text 'Showing 1 to 9 of 9 entries' and navigation links: First, Previous, 1, Next, Last. Three arrows point from labels below to specific columns in the table: 'Site Visit ID' points to the 'Site Visit Number' column, 'Visit Date' points to the 'Actual Visit Date' column, and 'Link to Report' points to the 'Report' link in the 'Report Issued Date' column.

Site Visit Number	Actual Visit Date	Report Issued Date	Report
SV00790	27/02/2013		
SV00822	12/03/2014	14/03/2014	<a href="#">Report</a>
SV00823	12/03/2014	13/03/2014	
SV00833	12/03/2014	14/03/2014	
SV00838	04/03/2011	13/03/2014	<a href="#">Report</a>
SV00852	14/03/2014	14/03/2014	<a href="#">Report</a>
SV00853	12/03/2014	14/03/2014	<a href="#">Report</a>
SV00871	12/03/2014	14/03/2014	<a href="#">Report</a>
SV00902	19/03/2014	19/03/2014	<a href="#">Report</a>

Finally, the EPA would like to thank all licensees for engaging with the LMA system, and we will issue further updates in due course as we have further information.