

**AUDIT REPORT***MCERTS for the self-monitoring of effluent flow***CONFIDENTIAL****Audit report Ref:** 16E0046.002**Consent/Permit No.** KP3732PL**Date of Assessment** 24/10/13**sira**  
CERTIFICATIONCSA  
Group**Operator (auditee)***Essar Steel Processing and Distribution UK Ltd***Operator representative****Name:** *Stuart Hill* **Tel:** *01384 471371***Title:** *EQA Supervisor* **email:** *Stuart.hill@essar.com***Operator Address***Pensnett Road  
Dudley  
West Midlands  
DY1 2HA***Scope of audit**




Minimum Requirements for the Self-Monitoring of Effluent Flow - Version

3.5

| Pre-assessment                          | Initial assessment  | Surveillance    |                  |             | Re-assessment   |             |
|---|---------------------|-----------------|------------------|-------------|-----------------|-------------|
| Site Inspection Service Provider        | Inspector           | Survey Date     | Report No.       | Pass / Fail | Certificate No. | Expiry Date |
| <i>Siris Environmental Flow Surveys</i> | <i>N Richardson</i> | <i>24/09/13</i> | <i>0122 1301</i> | <i>Pass</i> |                 |             |

**RECOMMENDATION** (del where applicable) **Next audit due...***Reaccept management system* **24 months***Auditor recommendations are subject to review by the Directors of Sira Certification Service who have veto power regarding all recommendations*

|  |   |                       |
|--|---|-----------------------|
| <b>Auditor</b><br><i>[Signature]</i><br>Signed | <b>Operator</b><br><i>[Signature]</i><br>Signed to accept recommendations | <b>Sira</b><br>Signed |
|--|---|-----------------------|

|   |             |  |
|---|-------------|--|
| <b>AUDIT REPORT</b><br><i>MCERTS for the self-monitoring of effluent flow</i> |             |    |
| <b>CONFIDENTIAL</b>   |             |  |
| <b>Audit report Ref:</b>  | 16E0046.002 |  |
| <b>Consent/Permit No.</b>   | KP3732PL    |  |
| <b>Date of Assessment</b>   | 24/10/13    |  |

### Impartiality Declaration

I confirm that neither I nor my organisation has had any consultancy or other relationship that could result in a conflict of interest with the above company within the last two years, other than activities conducted under the direction of Sira Certification, and will notify Sira Certification if this situation should change.

|           |   |      |          |
|-----------|---|------|----------|
| Signature |  | Date | 24/10/13 |
|-----------|---|------|----------|

## 1 SUMMARY REPORT

**Summary** *an overview of compliance of the management system with the MCERTS requirements*

*Since the initial assessment Oakside Solutions Limited t/a Servosteel has been taken over by an Indian multinational steel company, ESSAR and is now known as Essar Steel Processing and Distribution UK Ltd. This has resulted in a significant number of changes to the organisation and its operations which have taken place since the last surveillance visit.*




*A replacement 30° "Vee" notch weir plate, ultrasonic sensor and meter have been installed in order to achieve the level of measurement uncertainty required by the scheme. Site Inspection of the installed flow measurement equipment took place in November 2008 with a satisfactory outcome. Discharges at S1 are measured using a V notch weir and ultrasonic sensor.*

*The IPPC permit has one discharge point S1 Effluent Treatment Plant discharge to a Severn Trent Sewer with no discharge limits however limits have been specified within the consent to discharge to sewer (STW consent 005907V): 120m<sup>3</sup> per day; 2ls<sup>-1</sup>. There is an indirect requirement for flow measurement within the permit arising from absolute weight limits for specified heavy metal discharges.*

*The MCERTS manual compiled to satisfy the requirements of the current MCERTS Standard has been incorporated within the new Integrated management system.*

*Evidence documents and records made available during the assessment indicate that the company has fully complied with the requirements of the scheme. In-house IT skills have been used to develop a custom business system (SQL database) for amongst other things, maintenance records. No new issues requiring corrective action were noted. One observation was made (see section 3).*

*Essar Steel Processing and Distribution UK Ltd is operating discharge flow measurement equipment in accordance with company procedures and the requirements of the MCERTS scheme. Reacceptance of the management system is recommended with a gap of 24 months to the next surveillance.*

|  |             |  |
|--|-------------|--|
| <b>AUDIT REPORT</b><br><i>MCERTS for the self-monitoring of effluent flow</i><br><b>CONFIDENTIAL</b> |             |    |
| Audit report Ref:  | 16E0046.002 |  |
| Consent/Permit No.   | KP3732PL    |  |
| Date of Assessment   | 24/10/13    |  |

## 2 **AUDIT DATA**

### **Audit team members**

|                  |  |  |
|------------------|--|--|
| <i>Tony Wood</i> |  |  |
|------------------|--|--|




### **Interviewed Operator representative(s) (auditee)**

| <i>Area</i>                   | <i>Name</i>            | <i>Title / Job Function</i> |
|-------------------------------|------------------------|-----------------------------|
| <i>Systems and Operations</i> | <i>Stuart Hill</i>     | <i>EQA Supervisor</i>       |
| <i>Systems &amp; Data</i>     | <i>John Southcombe</i> | <i>IT</i>                   |
|                               |                        |                             |
|                               |                        |                             |

### **Areas sampled**

*Indicate the areas sampled during the audit. Indicate whether an area has been completely covered (C), sampled (S) or not applicable (N/A)*

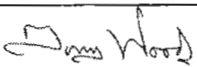
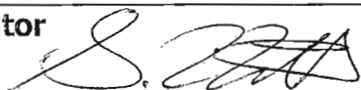
| <b>Requirement</b>                             | <b>C, S, N/A</b> | <b>ADR Ref</b> |
|--|------------------|----------------|
| 4.4 Quality/Environmental policy               | <i>C</i>         |                |
| 4.5 <b>Management responsibilities</b>         | <i>C</i>         |                |
| 4.6 Quality manual/Environmental documentation | <i>S</i>         |                |
| 4.7 Operating procedures                       | <i>S</i>         |                |
| 4.8 Document control                           | <i>S</i>         |                |
| 4.9 <b>Equipment inventory</b>                 | <i>C</i>         |                |
| 4.10 <b>Maintenance</b>                        | <i>S</i>         |                |
| 4.11 Commissioning                             | <i>S</i>         |                |
| 4.12 <b>Site changes</b>                       | <i>S</i>         |                |
| 4.13 <b>Verification</b>                       | <i>S</i>         |                |
| 4.14 <b>Data treatment</b>                     | <i>S</i>         |                |
| 4.15 Preventative and corrective actions       | <i>S</i>         |                |
| 4.16 Internal audits                           | <i>S</i>         | <i>01 Obs</i>  |

|   |                    |  |
|---|--------------------|--|
| <b>AUDIT REPORT</b><br><i>MCERTS for the self-monitoring of effluent flow</i> |                    |    |
| <b>CONFIDENTIAL</b>   |                    |  |
| <b>Audit report Ref:</b>  | <b>16E0046.002</b> |  |
| <b>Consent/Permit No.</b>   | <b>KP3732PL</b>    |  |
| <b>Date of Assessment</b>   | <b>24/10/13</b>    |  |

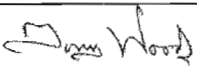
|                              |                |    |
|------------------------------|----------------|----|
| <b>3 AUDIT DETAIL REPORT</b> | <b>ADR No:</b> | 01 |
|------------------------------|----------------|----|




Indicate Para No. of Standard for each ADR 4.4 4.5 4.6 4.7 4.8 4.9 4.10 4.11 4.12 4.13 4.14 4.15 **4.16**

|  |                 |                                      |
|--|-----------------|--------------------------------------|
| <b>Description</b>   | <b>Category</b> | Major<br>Minor<br><b>Observation</b> |
| <p><i>The Standard states:</i><br/> <b>"4.16 Internal audits</b><br/> <b>4.16.1 Internal audits shall be performed according to a defined schedule to verify that operations continue to comply with the requirements of the management system. It is the responsibility of the designated competent person to plan and organise such audits. They shall be carried out by trained personnel who are operationally independent of the activity to be audited. Personnel shall not audit their own activities, except when it can be demonstrated that it will be effective.</b><br/><br/> <b>4.16.2 The audit findings and any corrective actions arising from them shall be recorded. The Operator shall ensure that corrective action is implemented within an agreed time."</b></p> <p><i>Internal Audit Report (issue 4 dated 15/08/12 has been used to create an audit checklist covering flow measurement activities which covers the six key areas of the standard. This checklist will be updated once the new EA MCERTS Standard (v4.0) has been issued to ensure continued compliance.</i></p> |                 |                                      |




|   |   |
|---|---|
| <b>Auditor</b><br><i>sign</i>  | <b>Operator</b><br><i>sign</i>  |
|---|---|

|  |
|--|
| <b>PROPOSED CORRECTIVE ACTION</b> <i>(to be entered if agreed after discussion during audit)</i> |
|  |

|   |                                |
|---|--------------------------------|
| <b>Auditor</b><br><i>sign</i>  | <b>Operator</b><br><i>sign</i> |
|---|--------------------------------|

|  |             |  |
|--|-------------|--|
| <b>AUDIT REPORT</b><br><i>MCERTS for the self-monitoring of effluent flow</i><br><b>CONFIDENTIAL</b> |             |    |
| <b>Audit report Ref:</b>   | 16E0046.002 |  |
| <b>Consent/Permit No.</b>  | KP3732PL    |  |
| <b>Date of Assessment</b>  | 24/10/13    |  |

|  |   |
|--|---|
| <b>4 AUDIT NARRATIVE</b>   |   |
| <i>information relevant to the audit which is not already included herein</i><br>Colour Code: Non-conformance (major) (minor) Observation Satisfactory |   |
| 4.4 Quality/Environmental policy   | <b>Quality Policy statement signed by Mr P Guest CEO and Executive Director on 16/03/13 has specific reference to MCERTS.</b>   |
| 4.5 Management responsibilities  | <b>Organisational Structure (MCERTS) Issue 05 08/08/2012 defines roles and responsibilities of all individuals involved in MCERTS.</b>  |
| 4.6 Quality manual/Environmental documentation   | <b>MCERTS Management System Requirements Cross Reference provided (Issue 2 01/03/2011 PEGG).</b><br><b>The company has created an integrated management system to cover Environmental, Quality and MCERTS requirements. The management system is externally certified to ISO 9001/14001 by LRQA (certificate no LRQ 11213 expires 07/08/14).</b>  |
| 4.7 Operating procedures   | <b>Flow Measurement Tank Cleaning (issue 3 dated 16/11/2011)</b><br><b>Control of Records and Documents (issue 3 dated 01/03/2011)</b><br><b>Equipment Inventory (MCERTS) (issue 5 dated 24/10/2013)</b><br><b>MCERTS Preventative Maintenance Checks Procedure (issue 4 dated 16/11/2011)</b><br><b>Commissioning and Site Changes (MCERTS) (issue 4 dated 19/11/2012)</b><br><b>Data Treatment (MCERTS) (issue 3 dated 01/03/2011)</b><br><b>Verification (MCERTS) (issue 3 01/09/2011)</b><br><b>Corrective Action Procedure (MCERTS) (issue 5 dated 19/11/2012).</b><br><b>Preventative Action Procedure (MCERTS) (issue 4 dated 16/11/2011)</b><br><b>Internal Audit Procedure (MCERTS issue 4 dated 01/03/2011).</b>  |
| 4.8 Document control   | <b>Documents retained electronically. Access provided via Company Intranet. Staff coached to treat paper copies of electronic documents as uncontrolled.</b><br><b>Current issues of "Minimum Requirements for the Self-Monitoring of Effluent Flow – Version 3.5" and "MCERTS for the Self Monitoring of Effluent Flow – Management System Requirements Guidance February 2013 – issue 12" were available at the time of the visit as soft copies.</b>   |
| 4.9 Equipment inventory  | <b>New Flow Sensor MCERTS 09, 30 degree notch plate MCERTS and meter data device MCERTS 10 recorded within the MCERTS Equipment Inventory Table (see above). This includes a list of equipment, functions and location.</b><br><b>Siemens Hydroranger sensor serial no in Site Inspection Report 2008/PBD/W4290065.</b>   |
| 4.10 Maintenance   | <b>MCERTS Preventative Maintenance Checks Procedure covers activities. Effluent Engineers assess the need for cleaning of V notch weir and tank on a frequent basis, depending upon the condition of the material being processed and the duration of processing; based on experience.</b><br><b>Records retained in new in-house Database (introduced June 2013. Information inputted by operator using local pc. 51 inspection and cleaning events recorded 03/10/13 Comment "it took all night to clean".</b><br><b>Excel records extracted for audit: 228 events first one dated 23/04/08 10 additional notes added during the 5 year period. All notes relate to operational problems not problems with measurement structure.</b><br><br><b>Existing equipment calibration and maintenance via Siris takes place every six months. Calibration certificates presented.</b><br><b>13/09/13 conducted by M Newton</b><br><b>06/03/13 conducted by M Newton</b><br><b>12/09/13 conducted by M Newton</b> |

|  |                    |  |
|--|--------------------|--|
| <b>AUDIT REPORT</b><br><i>MCERTS for the self-monitoring of effluent flow</i><br><b>CONFIDENTIAL</b> |                    |    |
| <b>Audit report Ref:</b>   | <b>16E0046.002</b> |  |
| <b>Consent/Permit No.</b>  | <b>KP3732PL</b>    |  |
| <b>Date of Assessment</b>  | <b>24/10/13</b>    |  |

|  |   |
|--|---|
|  | <p><i>16/03/12 conducted by M Newton</i></p> <p><i>ETP responsibilities shared between R Field (Head of Effluent and Trainer, W Baker (trained 18/04/08) &amp; K Aitchison (trained 12/09/12) commencing October 2011. MCERTS Training records presented. Trainers S Hill &amp; R Field.</i></p>  |
| 4.11 Commissioning                       | <p><i>Commissioning and Site Changes (MCERTS) meets the requirements of the standard.</i></p> <p><i>No new flow measurement equipment installed since previous surveillance visit.</i></p>  |
| 4.12 Site changes                        | <p><i>Covered by 4.11.</i></p> <p><i>Change control database interrogated on screen.</i></p> <p><i>No changes to facilities or operating processes have required review for their potential effect on measurement uncertainty have taken place since the last visit.</i></p> <p><i>MA1000001064 "Caustic dosing pump" work completed 29/04/13 (repair).</i></p>   |
| 4.13 Verification                        | <p><i>Documented in Verification (MCERTS) (issue 3 01/09/11).</i></p> <p><i>Verification record form for 2011 includes records of 42 reference plate checks since procedure update. Most recent event 02/10/13. All measurements reported as "within tolerance" or "As expected"</i></p> <p><i>Intermittent loss of data identified as a problem On 07/11/11 (weekend power cut)</i></p>  |
| 4.14 Data treatment                      | <p><i>Covered by Data Treatment (MCERTS issue 3 01/09/2011). Volume discharge data collected via DCS loop, manually and via memory card in local meter.</i></p> <p><i>Data for 2011 reviewed. Max volume discharged 52.7m<sup>3</sup> on 11/06/13 @ 01:42 1.461ls-1.</i></p>  |
| 4.15 Preventative and corrective actions | <p><i>Covered by Corrective Action Procedure (MCERTS) (issue 1 01/04/2008) and Preventative Action Procedure (MCERTS) (issue 2 01/12/2004).</i></p> <p><i>Last corrective action documented:</i></p> <p><i>Corrective action (ECAP 017) initiated on 01/04/11 following occasional data losses from one of the two meters monitoring S1. Root cause identified as manual power saving action by Maintenance (01/11/11).</i></p>   |
| 4.16 Internal audits                     | <p><i>Covered fully by Internal Audit Procedure (MCERTS)</i></p> <p><i>Internal Audit Report (issue 4 dated 15/08/12 has been used to create an audit checklist covering flow measurement activities which covers the six key areas of the standard. This checklist will be updated once the new EA MCERTS Standard (v4.0) has been issued to ensure continued compliance.</i></p> <p><i>Last internal audit of flow measurement activities report date 14/11/11.</i></p> <p><i>Conducted by W Roden.</i></p> |