

UKAS UPDATE 1 JANUARY 2010 - STACK EMISSIONS MONITORING



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1. Unannounced Visits and Sanctions Publicity:

In April 2009, UKAS communicated to all accredited stack emissions monitoring organisations our intention to begin a routine programme of unannounced site visits and to increase the publicity of sanctions issued by UKAS. These initiatives were introduced to address specific issues identified within the stack emissions monitoring industry and have now been running over the last 10 months. Within the communication from April 2009, UKAS stated our intention to review this situation as it progressed,

The un-announced visit programme carried out to date in 2009-10 has confirmed that in general many stack emissions monitoring organisations are now performing accredited work in accordance to the required standards and are demonstrating compliance and competence for these activities. In the communication of April 2009 UKAS outlined 'serious concerns' with the work being performed by the stack emissions monitoring sector, the review of the outcome of the unannounced visits programme has determine that the sector now appears to be beginning to address these issues appropriately. Consequently UKAS has decided in line with the previous communication to review the policy of additional un-announced visits to stack emissions monitoring organisations.

With effect from 01 June 2010 the frequency of unannounced visits will be determined using a risk based approach which will take into consideration the size and scope of the organisation, and any current issues related to stack emissions monitoring that have been identified by UKAS. In particular:

- Each accredited stack emissions monitoring organisation will receive *at least* one un-announced visit per four year accreditation cycle.
- For those organisations with *more* than three teams or multiples thereof an additional un-announced visit will be performed per four year accreditation cycle to that location, (i.e. if an organisation operates 6 teams they can expect 2 unannounced visits per accreditation cycle).
- Following each un-announced visit a UKAS management charge of 0.5 days will be chargeable to the organisation to cover planning and preparation effort for that visit.
- If the un-announced visit confirms on-going compliance the cost associated with the visit to the office/site will be in lieu of surveillance visit effort (1.0 days). In such that the 1.0 day effort will be charged with the invoice for the unannounced visit but that effort will be removed from the next scheduled surveillance visit.
- For those organisations not showing compliance or where significant issues are identified then the effort relating to the un-announced visit will be additionally chargeable as an extra visit including the additional 0.5 day UKAS management charge (1.5 additional chargeable days in total).
- For any organisation whose accredited stack emissions monitoring service results in a formal complaint/issue being received to UKAS and that complaint/issue is upheld the frequency of unannounced visits for that organisation may be increased. Any unannounced visits initiated in this manner will be fully chargeable to the organisation and will not reduce the effort of the next scheduled surveillance assessment, regardless of outcome. UKAS will continually review the need to maintain this increased frequency based on the outcome of any unannounced visit initiated in this manner.

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- Additional other un-announced visits may be performed by UKAS and therefore all organisations are expected to keep UKAS updated with work schedules for all locations for which they hold accreditation for stack emissions monitoring, irrespective if an unannounced visit has taken place.
- Un-announced visits may be performed at organisations offices and/or witnessing sampling work at site locations.
- The publicity of sanctions on the UKAS website and schedule of accreditation is unaffected by this review, and remains as detailed in the communication of April 2009.

UKAS will continue to keep the activities of accredited organisations within the stack emissions monitoring sector under review. If it is determined that the 'serious concerns' that lead to original implementation of this programme have returned, UKAS will review the risk based structure outlined above and may implement further measures.

In line with current arrangements UKAS will require that each SEM organisation provides a schedule of work to UKAS clearly detailing the scope of each accredited project covering all sampling teams/locations. This schedule needs to detail at least a rolling 2-3 months of planned work and will need to be updated to UKAS at least once every 3-4 weeks. It will be the responsibility of the organisation to keep UKAS updated with this information and inform us of any cancellations as they occur.

To help facilitate these unannounced visits UKAS will continue to liaise with the Environment Agency and Local Government Environmental Protection Officers to help ensure access to relevant sites. In addition due to the need for flexibility we intend to use UKAS staff member Rohit Chirodian or any of the assessors from our current pool of competent technical assessors to conduct these assessments. These assessors are: Bob Garland, Paul Mudway and Simon Medhurst. If your organisation has any legitimate objections to one or more of these assessors conducting an assessment of your organisation please inform UKAS as soon as possible.

Schedule of work details should be sent to workschedules@ukas.com . Please note that this address should only be used for schedules of work; you should continue to submit evidence of corrective actions as usual to the email address for the Section in UKAS that manages your accreditation (Environment and Industrial Chemistry - chemistrycustomerservice@ukas.com or Agri-Food and Biosciences and Construction Mechanical & Materials - AFBCMcustomerservice@ukas.com). If you need to contact UKAS by phone in relation to unannounced visits please contact UKAS on 0208 917 8400 and request to speak to Rohit Chirodian or Elizabeth Kilbee.

The following information will need to be included as a minimum on schedules of work submitted to UKAS, please use the attached spreadsheet to submit this information:

- Date(s) of site visit
- Which accredited location is performing the work
- Site Name and Address including the post code
- Site Contact details including telephone number (and email address if available)
- Whether work is planned to be ISO/IEC 17025 or ISO/IEC 17025 plus MCERTS
- Any specific requirements for access to the site (safety inductions, special PPE requirements etc)
- Scope of Sampling and/or Testing to be conducted categorised according to the following table (just indicate the category):

Category	Test
TE1	Total Particulate matter to BS EN 13284-1:2002 Total Particulate matter to BS ISO 9096:2003 Isokinetic sampling of gaseous species (with TE3) Particulate Matter <10 micron PM ₁₀ and PM _{2.5} to US EPA Method 201A/ BS EN ISO 23210:2009

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TE2	Heavy Metals to BS EN 14385:2004 Mercury to BS EN 13211:2002 Dioxins and Furans to BS EN 1948:2006 Dioxin-like Polychlorinated Biphenyls (PCBs) to BS EN 1948:2006 Polycyclic Aromatic Hydrocarbons (PAH's) to BS ISO 11338-1:2003
TE3	Hydrogen Chloride to BS EN 1911-1:1998 Hydrogen Fluoride to BS ISO 15713:2006 Sulphur dioxide to BS EN 14791:2005 Halides and Halogens (except HCl/HF) to US EPA Method 26 Isokinetic sampling of gaseous species (with TE1) Ammonia to US EPA Method 26/BS EN 14791:2005 Hydrogen Sulphide to US EPA Method 11 Isocyanates to US EPA Conditional Test Method 036 Hydrogen Cyanide to US EPA Conditional Test Method 033 Speciated VOC's to BS EN 13649:2002 Other single phase gaseous sampling
TE4	Carbon monoxide to BS EN 15058:2006 Carbon dioxide to ISO 12039:2001 Oxides of Nitrogen to BS EN 14792:2005 Sulphur Dioxide to ISO 7935/BS 6069-4.4:1992/TGN M21 Oxygen to BS EN 14789:2005 Total Organic Carbon to BS EN 12619:1999/BS EN 13526:2002 FTIR sampling and analysis to ASTM D-6348-03/EA TGN M22 Other instrumental sampling

2. Notification of Revisions to TGN M2:

Organisations should already be well aware that recently the new version of the Environment Agency's Technical Guidance Note M2 was published (Version 6, January 2010). This document details which standard methods are currently applicable to MCERTS stack emissions monitoring work and when specific standard methods will be superseded or withdrawn.

Among the many changes the following methods are to be superseded or withdrawn:

- All monitoring using an FTIR instrument will need to be updated to meet the requirements of the Environment Agency's own monitoring standard TGN M22. ASTM D-6348-03 for monitoring using an FTIR will become obsolete from **01 July 2011**.
- The sampling of asbestos fibres, man made mineral fibres and ceramic fibres to BS 6069-4.2 has been withdrawn from the MCERTS scheme with immediate effect.
- Velocity measurement (no specified standard) using either a vane anemometer or a hot wire anemometer has been withdrawn from the MCERTS scheme with immediate effect.
- The requirement for homogeneity testing has been included to meet the requirements of BS EN 15259 (section 8.3) and MID 15259, this has already been assessed and granted by UKAS and should appear on your UKAS schedule of accreditation.
- The sampling of mercaptans using a non-isokinetic technique (impingement into alcohol or mercuric cyanide) will need to be performed to the general requirements of BS EN 14791. This transition will need to be in place from **01 July 2010**.
- The sampling of particulates for fraction determination (PM₁₀ and PM_{2.5}) will need to be updated to meet the requirements of BS EN ISO 23210, USEPA Method 201 for PM₁₀ and PM_{2.5} monitoring will become obsolete from **01 January 2011**. Any organisation that currently holds ISO/IEC 17025 accreditation for this new method will have it transferred to the MCERTS section of their schedule immediately.
- The sampling of phosphorus (phosphorus trichloride) using a non-isokinetic technique (impingement) will need to be performed to the general requirements of BS EN 14791. This transition will need to be in place from **01 July 2010**.

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- The sampling of phosphorus (phosphine) using a non-isokinetic technique (coated tube) will need to be performed to the general requirements of BS EN 13649. This transition will need to be in place from **01 July 2010**.
- The analytical stage for tar and bitumen fume has been changed from MDHS 68 to MDHS 84, it is important that you check with your analytical laboratory that this is the service they can provide you.

After the dates specified above if your organisation has not successfully extended your scope of accreditation to incorporate the new methods (having had them assessed and satisfactorily cleared all non-conformities if applicable), then your organisation will not be able to claim sampling and/or analysis for these determinands under accreditation to ISO/IEC 17025 for MCERTS (Stack emissions monitoring). UKAS will be removing all reference to the accreditation of the superseded or withdrawn methods to ISO/IEC 17025 for MCERTS (Stack emissions monitoring) from accreditation schedules on the dates as detailed above.

To ensure an adequate timeframe for the assessment, corrective action and subsequent review of evidence relating to these methods, UKAS strongly recommends that applications for extension to scope be submitted as detailed below:

- Application for all monitoring by FTIR (instrumental) to TGN M22 to be submitted no later than **01 December 2010**.
- Application for monitoring of phosphorus to BS EN 14791 (impingement) no later than **31 March 2010**.
- Application for monitoring of phosphorus to BS EN 13649 (tube method) no later than **31 March 2010**.
- Application for monitoring of mecaptans to BS EN 14791 (impingement) no later than **31 March 2010**.
- Application for monitoring of PM₁₀ and PM_{2.5} to BS EN ISO 23210 no later than **31 July 2010**.

If you have not started the process of extending your scope to incorporate these new standard methods then please contact your assessment manager at the earliest opportunity.

Please note it is each organisation's responsibility to keep up to date with changes to all standard methods and when they are to become obsolete.

We thank you for your cooperation in this matter, if you have any queries or comments please contact your assessment manager.