

Environment Agency Policy

Cross-functional environment protection policy on flow measurement of aqueous point-source releases using the monitoring certification scheme (MCERTS).

Policy number: 184_07

Policy statement: This policy applies only to those processes and/or installations regulated by the Environment Agency under EPA '90, the PPC Regulations, RSA '93 (nuclear sites only) or WRA '91 (as amended under the Environment Act '95).

1. The Environment Agency may set limits on aqueous emission flow rate, total aqueous discharge volume or radioactive substance emission rate limits as part of a permission that allows the discharge. When such limits are set the Environment Agency may require Operators to measure the flow rate or total discharge volume. The Environment Agency will not require continuous flow measurement for individual discharges or types of discharges that it considers are low risk. If the permission requires the Operator to measure the flow then the flow measurement installation shall comply with the Environment Agency's Monitoring Certification Scheme (MCERTS) for Flow (www.mcerts.net).
2. Flow monitoring undertaken by the Operator shall be considered as part of the Operator's self-compliance monitoring programme. To provide representative aqueous emission flow monitoring, the equipment shall be located at a point where the flows are representative of the regulated aqueous emission. Operators shall be allowed to choose both the location and the technique of flow measurement as long as they comply with the Environment Agency's performance requirements, for example, better than +/- 8% uncertainty for daily volume.
3. Following installation of a flow measurement system the Operator shall employ an MCERTS appointed Inspector to audit the system and confirm that it complies with the MCERTS 'Self-Monitoring of Effluent Flow' scheme.
4. When an Operator is installing new flow equipment or replacing existing equipment they shall use equipment certified under the MCERTS 'Continuous Water Monitoring Equipment' scheme, provided that it is appropriate for their preferred flow measurement technique.
5. Operator management of aqueous emission flow monitoring shall be delivered through a Quality Management System (QMS) approach. When appropriate, based on scale and risk, the QMS needs to be assessed by a UKAS-accredited certification body.
6. A principal role of the Environment Agency in relation to an Operator's self-compliance monitoring is to audit their performance. The audit shall check that the system is being properly maintained and that the flow information provided is fit-for-purpose, reliable and consistent.
7. Reporting of an Operator's permitted aqueous emission flow rates and/or total volumes shall be a permit requirement and be sufficiently detailed to demonstrate compliance with any permitted limit.
8. The Environment Agency shall ensure that an Operator's flow data are collected and used effectively in order to optimise regulatory effort as well as making them publicly available in accordance with the relevant legislation.
9. The frequency of Operator aqueous emission flow monitoring required by the Environment Agency shall, wherever possible, be consistent within industry sectors unless there are extra requirements due to specific Directives (e.g., Urban Waste Water Directive, Water Framework Directive, etc.). Any deviations for the particular industry sector shall be detailed in the Decision Document for the permission.
10. The introduction of Operator aqueous emission flow monitoring as a new requirement for permissions issued under a regime should be supported by an appropriate Regulatory Impact Assessment (RIA) for that regime. This should be part of an overall cross-functional RIA, or may be a regime-specific variation on that, taking into account the relevant circumstances of that regime.

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Objectives:

That the results of Operators aqueous emission flow monitoring shall be:

- Accurate
- Representative
- Fit for purpose

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Policy authors: Neil Goodlad, Roger Saxon.

Policy sponsor: IR, Waste, RSR, Water quality co-sponsors

Signature of authorisation by policy sponsor (as set out in Schedule B of the NFSoD):

Version:

1

Date:

25/06/07

Available from:

If you have any queries relating to the content of this document, please contact the Primary Contact named above. If you have any suggestions for improvements, please contact the Policy Author.

If any of the terms or acronyms used in this document is unfamiliar you might find the definition in the Glossary on the Environment Agency's Intranet site:
Information Resources > [Glossary of Terms and Acronyms](#).

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EXPLANATORY NOTE

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Background

1. There are many regulatory regimes that set aqueous emission flow limits (including emission rate limits for radioactive substances) in their permissions either directly to controlled waters or to sewer that then require compliance assessment. -The purpose of this policy is to establish common standards for Operator aqueous flow monitoring of Environment Agency regulated discharges.
2. Moving to Operator self-compliance monitoring is aligned with the principles outlined in the Environment Agency's 'Delivering for the Environment – A 21st Century Approach to Regulation'.
3. Individual Environment Agency functions have different starting points for implementing Operator aqueous emission flow monitoring. This policy is intended to set a common framework to guide these functions. The scale and pace of the delivery of a common Operator aqueous emission flow monitoring regime may be considered through functional or regime-specific RIAs (Regulatory Impact Assessments).
4. The Environment Agency's approach to setting flow monitoring requirements should be targeted on environmental outcomes and be proportionate to the risks posed by the monitored activity.
5. There should be consistency and compatibility between the monitoring carried out under different regimes where the environmental media, types of emissions and monitoring measures are similar or the same.
6. Accuracy and reliability of flow measurement can be greatly influenced by the manner and location of the installation of the equipment and the maintenance of that equipment. The Environment Agency must be able to have confidence in the accuracy and reliability of the Operator's flow monitoring programme for aqueous emissions. It is necessary for the Environment Agency to specify minimum requirements and to ensure that those requirements are met. This auditing of the aqueous emission flow monitoring arrangements shall be primarily delivered through the application of the MCERTS 'Self-Monitoring of Effluent Flow' scheme.
7. There are two MCERTS schemes for aqueous flow measurement, the Product Certification Scheme and the Inspection Scheme. The Product Certification Scheme, ('Continuous Water Monitoring Equipment'), certifies flow monitoring equipment to the Environment Agency's required performance standards. The Inspection Scheme ('Self-Monitoring of Effluent Flow') ensures that on-site effluent flow monitoring arrangements, including maintenance, calibration and QMS, meet the Environment Agency's requirements. The assessment is carried out by appointed independent MCERTS Inspectors.
8. The scheme provides confirmation that the flow measurement equipment and its installation comply with the Environment Agency's requirements. It also confirms that the Operator's procedures are capable of delivering reliable flow results.
9. An independent certification body (Sira) operates these MCERTS Schemes on the Environment Agency's behalf and appoints MCERTS Inspectors to certify that the sites meet the Environment Agency's requirements.

Desired outcomes

Aqueous emission flow monitoring that is

- Accurate
- Representative
- Fit for purpose

Audience

- Internal: Area Environment Officers/Inspectors across all Environment Agency functions, Strategic Permitting Groups, Nuclear Regulatory Groups, Process Management, PIR and other specialist monitoring officers, EP Policy teams.
- External: Operators, DEFRA, Wales Assembly Government, Local Authorities, Health Authorities, FSA, NGOs, Trade Associations, Water UK.

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Policy Implementation Plan											
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1. Who are the target audiences, and do they require awareness, training or education?	<ul style="list-style-type: none"> Internal: Area Environment Officers/Inspectors across all Environment Agency functions, Strategic Permitting Groups, Nuclear Regulatory Groups, Process Management, PIR and other specialist monitoring officers, EP Policy teams. Awareness via cascade/EAMS. External: Operators, DEFRA, Wales Assembly Government, Local Authorities, Health Authorities, FSA, NGOs, Trade Associations, Water UK, SIRA. Awareness through liaison and consultation. 										
2. What do they need to know?	Understanding of the Environment Agency's MCERTS for Flow policy and how it is to be implemented.										
3. When do they need to know it?	As soon as practicable.										
4. How will they be told?	Available via EAMS. Externally through meetings and liaison. Incorporated into future technical guidance.										
5. Who will tell them?	Internal: /Operations External: Functional Policy										
6. Monitoring of Progress Method(s): Success Criteria: Date(s) Undertaken: Comments:	By periodic review/KPIs. <ul style="list-style-type: none"> Implementation of MCERTS for Flow programme in each Region resulting in robust audit of Operators aqueous emission monitoring, measurement and reporting. Delivery of comprehensive Operator flow monitoring reports. All permissions carry a summary of current permitted/authorised flow limits. Subject to a risk-based approach, frequencies of Operator aqueous emission flow monitoring are consistent across industry and within sectors with any deviations detailed in Decision Documents. Representative flow monitoring points shall be available. 										
7. Authorisation	<table style="width: 100%; border: none;"> <tr> <td style="width: 50%; text-align: center;"><u>Policy Sponsor</u></td> <td style="width: 50%; text-align: center;"><u>Chair Approval Body</u></td> </tr> <tr> <td>Sign:</td> <td></td> </tr> <tr> <td>Name:</td> <td></td> </tr> <tr> <td>Title:</td> <td></td> </tr> <tr> <td>Date:</td> <td></td> </tr> </table>	<u>Policy Sponsor</u>	<u>Chair Approval Body</u>	Sign:		Name:		Title:		Date:	
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8. Review Date	<table style="width: 100%; border: none;"> <tr> <td style="width: 50%;">25/09/08</td> <td style="width: 50%;">Version: 1</td> </tr> </table>	25/09/08	Version: 1								
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