

Site Inspections: Overview of Experience and Lessons Learned in Ireland

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ETS Inspections in Ireland

- ETS Specific Inspections are carried out in Ireland.
- Inspections are the responsibility of the CA and are carried out by Inspectors in the CA.
- In Ireland there are 100 stationary installations and 3 inspectors who carry out ETS site inspections.
- The three inspectors also issue greenhouse gas emissions permits, approve Monitoring Plans, review Annual Emissions Reports and assess Activity Level and Capacity Changes related to the installations inspected.
- The Site Inspection Plan is prepared annually using a risk based approach and is adaptable to ongoing re-prioritisation e.g. due to changed circumstances at the site.

ETS dedicated Inspections

The Process- Planning

- A risk assessment process prioritises site inspections based on:
 - ❑ installation size, number of emission points,
 - ❑ no. of non compliances;
 - ❑ notifications/meter failures,
 - ❑ complexity of activity, range of fuels/materials used,
 - ❑ new staff,
 - ❑ AEM issues raised by Verifier, whether AEM was resubmitted,
 - ❑ free allowance application.
- In addition site visits are generally conducted for New Entrants and where serious issues are detected in the AEM report.

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The Process- Preparation

- Dedicated workflow on ETSWAP for site inspections.
- Operator notified in advance with outline of issues to be covered.
- Health and Safety requirements confirmed with Operator.
- Desk based review of all correspondence/notifications, AEM reports, verifier's findings, monitoring plan and permit, previous site visit reports, annual activity level and capacity change data and information for preparation of detailed questionnaire.
- A detailed questionnaire is completed during the site inspection. Relevant personnel are interviewed, a detailed site inspection of infrastructure such as emission sources, source streams, and metering arrangements is undertaken.

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The Process- On-site

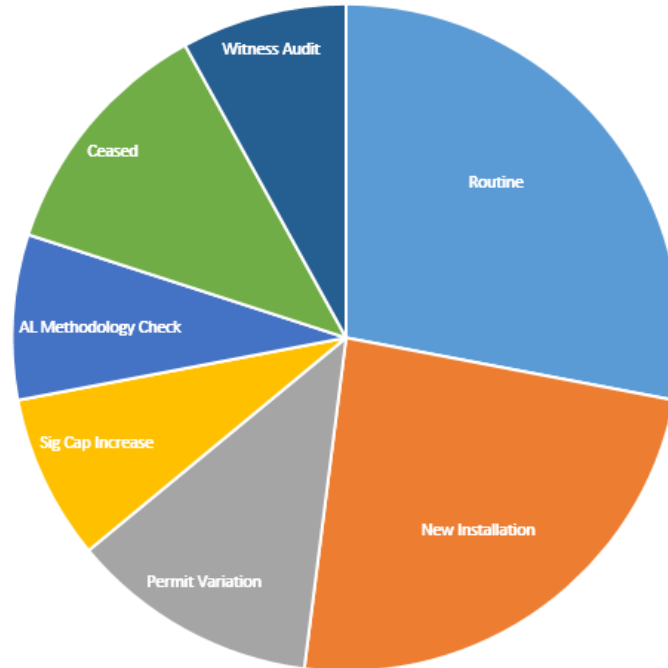
- The aim is not to duplicate the Verifiers role.
 - ❑ Focus on for example, application of correct calculation methodology and data validation
 - ❑ Procedure implementation
 - ❑ Compliance with agreed sampling and analysis procedures, calibration and maintenance of meters
 - ❑ Justification of uncertainty values, changes in capacity and activity level
 - ❑ Inclusion of all emission sources and source streams.
- Findings of site visit presented to Operator at closing meeting.
 - ❑ Senior Management are invited to ensure staff are supported with necessary resources to implement recommendations.
 - ❑ Operator reminded of legal obligations, availability of guidance material and updated on current developments.

Follow up after Inspection

- Following the visit an improvement report is issued through ETSWAP with dates for close out of actions.
- Close out is tracked through the system with reminders issued to the Operator and CA.
- For significant issues a follow up site visit is undertaken to confirm closeout.
- Implementation of recommendations is checked by the Verifier and CA during the update of the monitoring plan and review of AEM report and at subsequent site visits.

Summary of Inspections 2016/2017

Type of Site Inspections



Summary of Inspections 2016/2017

Type of Site Inspections (22 Stationary installations and 4 aviation)

- **Routine Inspection** (3 stationary installations and 4 aviation)
- **New Installation first permit application** (6 stationary installations). Member of Registry Team also attended one inspection.
- **Permit Variation/Monitoring Plan Submitted** (3 stationary installations)
- **Application for Significant Capacity Increase Allocation Submitted:** (2 stationary installations)

Summary of Inspections 2016/2017 (continued)

- **Check on Methodology and Data used for Calculation of Activity Level:** (2 stationary installations)
- **Confirming Installation has ceased /fallen below threshold:** (3 stationary installations)
- **CA acted as an observer during witness audit of verifier.** This happened on two occasions – one stationary installation and one aircraft operator.

For Site Inspections where there was a focus on a particular topic e.g. new source stream, emission source or process, a routine inspection of existing procedures, emission sources, source streams and metering devices was also carried out.

Conclusions

- Site Inspections are an effective tool to assess Operator compliance but require resources.
- They are not intended to duplicate the work of the Verifier.
- Site visits aid the continuous improvement of monitoring methodology. Senior Management are made aware of requirements for compliance and support implementation.
- Site visits confirm installation boundary for New Entrants and ensure monitoring and reporting requirements can be met.
- Site visits aid in the better understanding of complex significant capacity changes.