

Thalia AWRP ODC Ltd
Allerton Waste Recovery Park
Knaresborough
HG5 0SD

Our ref:
EPR/KP3808PN - BS
EN 14181 reqs
Date: 10 Sept 2025

Dear [REDACTED]

Quality Assurance of Continuous Emissions Monitoring under BS EN 14181

The Environment Agency has recently published revised guidance on [the quality assurance of continuous emissions monitoring systems \(M20\)](#). UKAS Accredited test houses should now have updated their procedures to reflect the changes and secure reaccreditation from UKAS.

You should familiarise yourselves with the new guidance (see Appendix 1 below for a list of changes) and note the other information in this letter.

Reporting calibration functions

In addition to the publication of the revised guidance, the Environment Agency is introducing additional reporting requirements for large combustion plant (LCP) and waste incinerators and co-incinerators to report the results of their annual surveillance tests (ASTs) and QAL2 tests.

Reporting will require you to confirm:

- whether the variability and calibration validity tests (which comprise the AST) pass for each pollutant monitored
- details or investigations into any AST failures
- the date of the QAL2 and new calibration function, where relevant
- the date any new calibration functions were entered into the Data Acquisition and Handling System (DAHS) following a QAL2

For LCP, reporting will be on new CEM2 and CEM3 Forms, which will be made available via the [Energy UK website](#). Operators should submit these forms within the quarterly reporting period during which the result of the latest ASTs and/or QAL2s are received, following up with further required information where necessary in the next reporting period.

For waste incinerator and co-incinerators, reporting will be via revised Air 9 Forms already circulated which operators should submit within the 6 monthly reporting period during which the ASTs and/or QAL2s are performed, following up with further required information where necessary in the next reporting period.

Note that our monitoring guidance (see link above) requires an indication of the results of the AST or QAL2 exercise to be submitted by the monitoring contractor to the operator within 1 month of the date of the completion of the exercise under normal circumstances.

The relevant reporting form is attached to this letter and should be used for reporting under your Environmental Permit from 1 January 2026, or earlier if you are able to. You can also agree an alternative reporting format with your local regulatory officer if you need to, provided that the core content is still reported to us.

Compliance with Permit Conditions

As the [Legal Operator](#) of the regulated facility, it is your responsibility to ensure compliance with all conditions of your environmental permit, including those pertaining to monitoring activities and where third-party contractors (including suppliers of monitoring equipment and UKAS-accredited MCERTS test houses) support those activities. This means you must have procedures within your management system for checking the work of your monitoring contractors to ensure you are meeting your permit requirements to monitor emissions to BS EN 14181. For example, you should:

- Audit your monitoring contractors and the reports which they send you, which you must also do to obtain a satisfactory score under our Operator Monitoring Assessment (OMA) Audit.
- Compare the values of the new and old calibration functions and query any significant differences with your monitoring contractor. We have developed an example of a spreadsheet that you could use to help you do this (see attached). You can use this to carry out internal checks on your new calibration functions, but you do not have to submit this spreadsheet to us when you send us your reporting forms. You could also agree an alternative checking methodology with your monitoring contractor if you wish, but note that in all cases, these high-level screening checks should not be used as a substitute for a full auditing procedure as part of your management system (see above).
- Check the new calibration function has been entered into the DAHS, and that it is correct.
- Within 3 months of a new calibration function being entered into the DAHS, review emission levels from the plant and, where relevant, abatement reagent consumption rates, to look for any changes that could be due to an incorrect calibration function.

In line with our [Compliance Classification Scheme](#), we will score any permit breaches due to failure to monitor emissions in accordance with BS EN 14181, including any retrospectively identified exceedances of an emission limit value (ELV), and any associated root cause. Where the management system fails to ensure that the continuous emissions monitoring systems (CEMS) are operating to BS EN 14181, the CCS score for the root cause may be higher than for the actual environmental impact of any identified ELV exceedances.

Finally, we would like to take this opportunity to remind you that, as per the requirements of BS EN 14181:2014 Section 8.6, ASTs must always be carried out, failures investigated and any issues appropriately rectified *before* undertaking a new QAL2 (even where QAL2s are routinely undertaken every year as a precautionary measure), as only ASTs will identify any systemic drift within the CEM.

Yours faithfully

[Redacted Signature]

Installations Officer
Foss House
York

Appendix 1 - Changes in the new version of Stack emissions monitoring: quality assurance of continuous monitoring (formerly TGN M20) – Published March 2025

Sections with changes:

- 3.1 Repairs to be carried out within 6 months
- 3.7.3 Uncertainty allowance for the SRM is 20% of the ELV, or 1mg/m³ for ELVs below 5mg/m³
- 3.7.4 Regulation when you cannot calibrate particulate CEMS
- 3.7.5 Include NOx raw data
- 3.7.5 Calibration functions for NOx
- 3.7.17 50% CI for particulates when using ELVs of 5mg/m³ or less
- 3.8 Frequency of QAL2 checks (trigger level increase from 5% to 10%)
- 3.11 Extending the calibrated range (to include CCGT and solid fuel stations)
- 3.14 QAL2 report (added information that may be required by the EA)
- 4.1 QAL3 general (updated table of suggested SMS for waste incinerators)
- 5.3 AST failures (added information about annual QAL2s and investigating AST failures)
- 7. (1.1) Report template:
 - What was the previous calibration function?
 - Has the calibration function varied by more than 10% since the previous test?