

Compliance Assessment Report CAR_NRW0039942

Permit being assessed: TP3639BH.

For: Tremorfa Melt Shop , held by Celsa Manufacturing UK Ltd

At: Tremorfa Works New Melt Shop Seawall Road , Tremorfa, Cardiff, South Wales, CF24 5TH.

Type of assessment carried out: Site Inspection, Reason: Routine.

On 12/05/2022 between 11:00 and 15:00.

Parts of permit assessed: 1.1 Management

NRW Lead Officer: Richard Taylor.

Report sent to: Hannah Powell, Environmental Manager on 23/05/2022.

1. Summary of our findings (full details in section 4)

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
A1 - Specified by permit	Assessed (A)	

Result types are explained in more detail in the 'Important Information' section below.

Total number of non-compliances recorded	Total non-compliance score
0	0

How we use the non-compliance score to calculate your annual fee is explained in the 'Important Information' section below.

2. What action is required?

No action required.

3. What will happen next?

Any non-compliance we have identified and recorded on this form is an offence. It can result in criminal prosecution and/or suspension or revocation of your permit.

At this time, we do not intend to take any further action.

This statement does not stop us from taking additional enforcement action if further relevant information comes to light or offences continue.

4. Details of our assessment

NRW Celsa Meltshop site inspection 12th May 2022

Celsa sent through an agenda prior to the meeting.

Present, Hannah Powell, (Celsa Environment Manager), Steve Jones, (Industrial Manager Celsa), Richard Taylor (NRW Senior Industry and Waste Officer).

Actions from Previous CAR forms

- From CAR form dated 31st Dec 2021, site have built in contingency into their air stack monitoring timetable to allow enough time in the quarter for rescheduled sampling to take place following Q4 2021 A5 stack missed monitoring. The sampling is now scheduled at the beginning of each Quarter. **Complete.**
- Fly infestation management – site confirmed that spraying is contracted to be carried out during the summer months. **Ongoing -**

1.0 Recent Complaints.

1.2 WIRS 2202791 – Fugitive dust, 15th Apr 2022. This complaint necessitated an inspection of the ongoing repairs to the cladding around the main meltshop building. The plant was shut down for maintenance at the time of the inspection. No dust was seen. The site was undergoing recladding works at the time. This included a specification upgrade which introduced double cladding, and joist strengthening. 2 gangs were on site with plans to complete the task within 15days. Repairs to the top (unseen) roof areas were also underway. In future the interior cladding will indicate the state of repair of the outside cladding. The works seen were a welcome improvement.

1.3 WIRS 2203391 – Noise, 10th May. This complaint was not specifically aimed at Celsa as there are other potential sources in the area. Nevertheless, it was prudent to remind site of the time of year and the potential for night shift teams to leave doors open during the summer nights which could affect the local neighbourhood.

1.3.1 Site Action

Site immediately prioritised an inventory check on all site doors and windows for functionality and to repair where necessary. No time limit was given, but it is understood this will take immediate effect. **Site to confirm when this has been carried out.**

1.3.2 NRW Recommended actions

- **Toolbox Talks** – Celsa UK to raise the potential issue of industry generated noise on the local community with all Celsa staff and communicate the need to be good neighbours by reducing noise generated from site activities, especially during unsocial hours 11pm – 7am during night shifts. Note these are the hours in which nuisance complaints can be received by NRW and the Local Council, so raising awareness of the issue with the workforce would be a good step towards mitigating the issue.
- **Noise awareness training** - to include reminders to keep doors and windows shut when not in use, to remind drivers to minimise drop heights, to remind workers of the proximity of sleeping neighbourhoods and the duty of care responsibilities the workers have on community.
Note; The Environment Manager had recently carried out similar training to the separately permitted Rod and Bar Mill staff.

2.0 Fly Management

Site were reminded that the fly breeding season is due to reach its zenith soon. The site reported that they

had contracts already in place with a specialist company (ECO PRO) to carry out spraying once per week when the site took delivery of cans. The contract runs from March to September. Also, there were fly traps positioned throughout the site. This was seen as good proactive management.

Ongoing

3.0 Millscale storage.

Site need a temporary increase in the permitted storage capacity of Millscale generated by activities from the 3 permitted Celsa sites. Presently only the Meltshop permit has a capacity of 6000 tonnes capacity at any one time made up from the three input streams. The site wishes to increase this to 18,000 tonnes because this is the capacity of the ship which takes it to Malaysia for reprocessing and would therefore be more financially viable.

The current storage area was inspected and seen to be limited in size to the effect that it would not be viable to store increasing amounts in the materials yard. Therefore, it was seen as not being in the sites interest to store materials on the site which could be sent for reprocessing.

Millscale pile, materials site.



The last permit variation decision document V009 states 'existing measures are in place to minimise the risk of contamination (e.g., from oil or fuel), for the whole minerals site where slag is handled and stored', and 'The whole minerals site currently has infiltration drainage of rainwater, and the collection/soakaway from new areas of hardstanding will not affect the overall drainage practice' and 'existing measures are in place to minimise the risk of contamination (e.g. from oil or fuel), for the whole minerals site where slag is handled and stored'.

However, the size of the piles would need to be managed to avoid the risks posed by self-heating, as well as windblown dust. Existing control measures to the site dust management plan and the site fire prevention management plan (FPMP) will need to be reviewed to manage the increase effectively.

Based on this the decision to allow a temporary controlled increase in Millscale (EWC 10 02 10) at the minerals site is justified pending the following actions.

1. Site to assess the impact to the environment (dust, seepage to ground) from temporarily storing up to 18,000 tonnes of Millscale (EWC 10 02 10) in position on the materials yard.

Due 30th June 2022

2. Site to review the site Fire Prevention management plan against UK.Gov guidance found at [Fire](#)

[prevention plans: environmental permits - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/prevention-plans-environmental-permits) For info, the site FPMP was a permit improvement condition brought under variation V008 at IC4.

Due 30th June 2022

3. Site to review the Dust Management plan with a view to the increased volumes of Millscale.

Due 30th June 2022

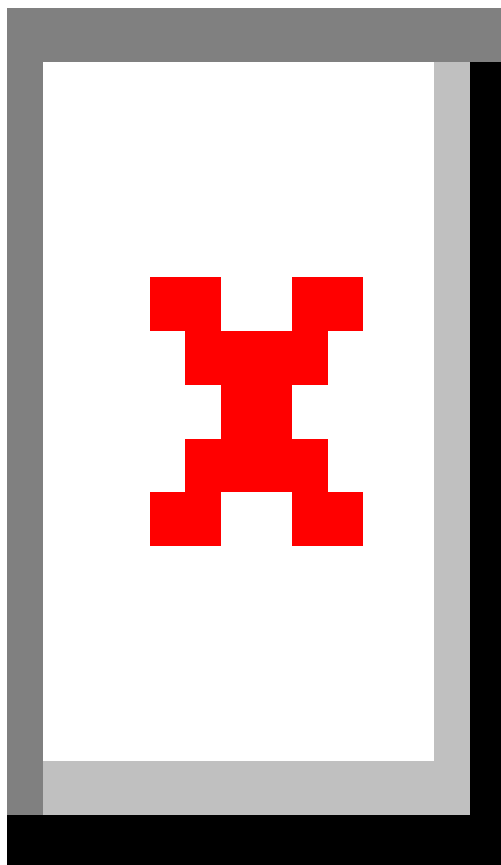
4. Site to produce a shipping manifest which details the dates of sailing, amounts scheduled to be taken for the next 12 months.

Due ASAP

5. Site to apply for a permit variation to request an increase of the permitted maximum tonnages of Millscale (10 02 10) to be stored pending recovery at any one time. An increase from 6000 tonnes to 18,000 tonnes is required.

Due ASAP

The current limits are listed in A10 of the current site permit which is reproduced below and would be updated in the new variation application.



4.0 Minerals site tour

The Mineral site is subcontracted from Celsa and run under the Celsa meltshop permit. The site appeared to

be well managed and tidy. The site operators produced plans of the site which showed what each pile of material was, and what estimated quantities were held. The quantities are frequently updated, and the site utilises qualified drone flyers to assess more each material more accurately. The plans seen were an excellent management tool.

4.1 Operational face

Various piles of materials were seen to have crust on the external surfaces which formed a resistance to wind. However, the open faces seen, like the example below, were more prone to wind effects and dust creation. It is important to minimise the operational faces of the piles as much as possible to minimise any dust generated by site activities



As wind was observed at the site visit to lift material and create potential dust at low wind speeds (~10mph) action is placed on site to minimise dust creation from the piles by minimising the working face of the material. The crust formed as a skin on the outside of the piles was seen to control the possibility of wind lift more effectively, but the open face loose material was prone to wind lift.

Action 1. Minimise dust creation from site by keeping the working/operational face of the piles to a minimum. Due ASAP.

4.2 Haith Plant

The Haith Plant was not operating at the time of the tour. Site have a surplus of dross from the recycling operation which is growing. This is the fraction of material which is not economical enough to reprocess any further and was seen to consist mainly of high energy plastics and dense rubber. It is known as 'sterile material' to site and has a high carbon content. Previous attempts to dispose of the material have resulted in a small amount being sent out for sample trials at a local waste incinerator, but contracts to remove the material have not been drawn.

Site agreed to revisit disposal routes in line with the waste hierarchy of reduce, re-use, recycle and seek alternatives for disposal other than landfill.

Action 2. Revisit previous attempts to dispose of the Haith plant dross for viability. Update due 30th June 2022.



Pic – Current Haith Plant Dross pile

4.3 EAF Dust Cement

Site are proposing using EAF dust in a cement to use on site as a filling material. Site need to properly assess the possible implications of this especially potential long-term leaching. Site are advised to put together a case for NRW waste regulation to assess prior to the material being used.

End.

If you have any queries about this report, or to discuss completion of any actions, please contact the NRW Officer named above.

Important information

Legal status of this report

Your permit is issued to you under the Environmental Permitting Regulations. You have a responsibility to comply with the conditions of your permit and prevent pollution/harm of the environment. You must also ensure that you comply with any other relevant legislation that may apply to your site's operations.

This report explains the findings of our assessment and any action you are required to take. We categorise non-compliance using our guidance for assessing non-compliance at regulated sites.

When we find potential non-compliance/s we will normally give you advice on how to maintain compliance.

To correct non-compliance, we may:

- require you to take specific actions
- issue a notice
- review the conditions of your permit.

Any advice and guidance we give will be without prejudice to any other enforcement response that we consider may be required.

Assessment results and non-compliance categories (used in section 1):

Assessment result	Description
Assessed (A)	Assessed or assessed in part, no evidence of non-compliance found
Action only (X)	Action only relating to the activity assessment
Ongoing (O)	Ongoing non-compliance, not scored

Non-compliance category	Description	Score
C1 Major	Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property	60
C2 Significant	Potential to have a significant impact or effect on the environment, people and/or property	31
C3 Minor	Potential to have a minor or minimal impact or effect on the environment, people and/or property	4
C4 No environmental impact	Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property	0.1

How we use assessment scores

The number and severity of non-compliances recorded in a year will affect your annual subsistence fee the following year. A non-compliance factor is added to your site's Operator

Performance Risk Appraisal (OPRA) score when we calculate your fee to reflect the additional resource we use to assess permit compliance.

What are suspended scores?

In line with our guidance, we may suspend scores for up to six months to allow time for remedial action to be taken. Suspended scores will be re-instated if the action is not completed.

Full list of Industry and Waste action criteria (used in section 1 and 2):

A: Permitted activities

- A1 Specified by permit

B: Infrastructure

- B1 Infrastructure – Engineering for prevention and control of emissions
- B2 Infrastructure – Closure and decommissioning
- B3 Infrastructure – Site drainage engineering (clean and foul)
- B4 Infrastructure – Containment of stored materials
- B5 Infrastructure – Plant and equipment

C: General management

- C1 General management – Staff competency/training
- C2 General management – Management system and operating procedures
- C3 General management – Materials acceptance
- C4 General management – Storage, handling, labelling and segregation

D: Incident management

- D1 Incident management – Site security
- D2 Incident management – Accidents, emergency and incident planning

E: Emissions

- E1 Emissions – Air
- E2 Emissions – Land and groundwater
- E3 Emissions – Surface water
- E4 Emissions – Sewer
- E5 Emissions – Waste

F: Amenity

- F1 Amenity – Odour
- F2 Amenity – Noise
- F3 Amenity – Dust/fibres/particulates and litter
- F4 Amenity – Pests/birds and scavengers
- F5 Amenity – Deposits on road

G: Monitoring and records, maintenance and reporting

- G1 Monitoring and records, maintenance and reporting – Monitoring of emissions and environment
- G2 Monitoring and records, maintenance and reporting – Records of activity, site diary/journal/events
- G3 Monitoring and records, maintenance and reporting – Maintenance records
- G4 Monitoring and records, maintenance and reporting – Reporting and notification to Natural Resources Wales

H: Resources efficiency

- H1 Resource efficiency – Efficient use of raw materials
- H2 Resource efficiency – Energy efficiency

Enforcement response

Any permit condition non-compliance is an offence and we may take legal action against you. Action we take can include prosecution, serving a notice on you and/or suspension or revocation of your permit. See our Enforcement and Sanctions Guidance for further information.

Data protection notice

You should make sure that anyone named in this report knows that the information it contains will be processed by Natural Resources Wales to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s).

We may also use and/or disclose the report in connection with:

- offering or providing you with our literature or services relating to environmental matters
- consulting with the public, public bodies and other organisations (e.g. Health and Safety Executive, local authorities) on environmental issues
- carrying out statistical analysis, research and development on environmental issues
- providing public register information to enquirers
- investigating possible breaches of environmental law
- assessing customer service satisfaction and improving our service
- Freedom of Information Act or Environmental Information Regulations requests.

We may also pass it on to our agents or representatives to do these things on our behalf.

Disclosure of information – this report will be available to view on-line

If you think this report contains commercially confidential information that should not be placed on our public register, you must contact your local Natural Resources Wales office within **fifteen working days** of receiving this report, using the contact details in the accompanying email or letter. You must give a full explanation of why it should not be added to our public register, including specifying which information is commercially confidential. We will assess your request and respond to you within 20 working days to let you know if we agree to your request.

What do I do if I disagree with the report or have a complaint?

If you disagree with this compliance assessment report, you should contact the lead officer without delay to discuss your concerns.

If you are unable to resolve the issue with the lead officer or their line manager you should contact our Customer Contact team on 0300 065 3000 (Monday to Friday 08:00 – 18:00), or email enquiries@naturalresourceswales.gov.uk for details of how to raise your dispute further through our Complaints and Commendations procedure.

If you are dissatisfied with our response, you can contact the Public Services Ombudsman for Wales by phone on 0300 7900203 or by email at ask@ombudsman.wales

Welsh Language Standards

We are committed to establishing Natural Resources Wales as a naturally bilingual organisation. We will provide compliance reports in your preferred language.