

27th January 2023

Mrs E A Parr
EPR Compliance Assistant
Environment Agency Wales
Rivers House
St Mellons Business Park
St Mellons
CARDIFF
CF3 0EY

Our Ref: W:\Environmental\IPPC\Environment Agency Reporting\Permit Reporting\Section Mill>Returns\Annual\2021\BV0767IT
4.1.4 Annual Returns 2022.doc

Dear Mrs Parr,

RE: Section Mill EPR Permit BV0767 4.1.4 Annual Returns 2022

In accordance with CELSA Manufacturing UK Ltd Environmental Permitting Regulations (EPR) Section Mill Permit BV0767, permit condition 4.1.4 requires the following:

'4.1.4 The Operator shall review fugitive emissions, having regard to the application of Best Available Techniques, on an annual basis, or such other period as shall be agreed in writing by the Agency, and a summary report on this review shall be sent to the Agency detailing such releases and the measures taken to reduce them within 3 months of the end of such period.'

Principle sources of fugitive emissions from the Section Mill are from the three roof vents located over the cooling beds, rolling mill and furnace areas, which release direct to air from within the building and contain water vapour from the cooling circuit and any dust emitted from the process activities. The open water treatment system clarifier will also give rise to fugitive emissions, principally water vapour.

Operations that may give rise to fugitive emissions of dust to air are:

- Furnace refractory works
- Scale removal from the furnace

Both operations are undertaken within the main rolling mill building.

Operations that may give rise to fugitive emissions to surface water, sewer and groundwater are:

- Leaks and Spills

1.0 Control of Fugitive Emissions to Air

1.1 Furnace Refractory Works

No complaints were received regarding furnace refractory works at the Sections Mill during 2022. During refractory works, the furnace is kept under negative pressure thus preventing the escape of dust. Replacement of refractories is only undertaken during plant shutdown periods and the waste is placed into skips. The refractory material does not typically produce fugitive dust as it is in the form of large solid pieces. Ceramic fibres are dealt with under specific health and safety requirements, which include but is not limited to double bagged and sealed prior to off site disposal.

The furnace refractory replacement is undertaken when the furnace is not in operation however the furnace extraction system is in operation during refractory repairs/replacement to provide a more comfortable working environment for the refractory engineers. The extraction applied isn't significant as it only provides fresh cool air and does not lead to any release from the process. Any dust arising settles within the furnace and is collected by vacuum when removing scale from the hearth.

Any waste which accumulates in the furnace flue-ways is periodically removed by a specialist waste contractor using a vacuum to extract the dust into closed skips for subsequent off-site disposal.

There have been no changes to the above activities during 2022.

1.2 Scale Removal from the Furnace

No changes have been made to the following scale removal controls during 2022, and no complaints were received. Scale is removed from the furnace hearth on a weekly basis, via the furnace access doors. The scale is manually scraped into purpose handling bins before being emptied into a dedicated scale skip. The scale flakes do not typically cause fugitive dust as they are large dense particles.

Scale accumulating on the floor of the furnace is removed during shutdown periods, which is not prone to creating fugitive dust, as the flakes are large dense particles.

2.0 Control of Fugitive Emissions to Surface Water, Sewer and Groundwater

2.1 Leaks and Spills

Surfacing

Activities that may give rise to fugitive emissions are conducted on areas with concrete hardstanding.

There have been no changes to these activities or any complaints received during 2022.

There have been no fugitive emissions from these activities during 2022.

Drainage and Other Sub-Surface Structures

There are no underground storage tanks at the Sections Mill, or other sub-surface structures with the exception of building cellars with impervious lining. Surface drainage from areas of hardstanding runs to the combined surface/foul sewer.

There have been no changes to these activities or any complaints received during 2022.

Secondary Containment

Containment is provided for the storage of oils and chemicals on site. Following the publishing of Water Resources (Control of Pollution) (Oil Storage) (Wales) Regulations 2016 and following best practice guidance (Pollution Prevention Guidelines: PPG 2 — Above Ground Oil Storage Tanks), all tanks, drums or other containers of more than 200 litres are inspected on a monthly basis during internal environmental audits, bund inspections are also conducted during these audits. Additionally, all fill points are within the bunded areas.

There have been no changes to these activities or any complaints received during 2022.

During 2022, a brick bund was constructed in the south end of the Sections Mill warehouse for the purpose of storing oil barrels and IBCs. This improvement was praised by an ISO14001:2015 Environmental Management System lead auditor during a surveillance audit in July 2022.

As there have been no changes to any of the above activities or any complaints received during 2022, the current controls for fugitive emissions are deemed relevant and up to date.

Water Emissions

A Schedule 1 form was submitted in February of 2022 for breaching the level of copper in the water trade effluent analysis report. Monthly sampling of trade effluent found the level of copper was 1.1mg/l which exceeds the 1.0mg/l permit limit. Investigations concluded that at the time of sampling, water from demolition work was being pumped into the Sections Mill water treatment area. It is believed that this was the root cause of the incident. Daily copper samples were taken for a month following the incident, and all sample analysis was returned well below the permit limit. Due to the nature of the construction work taking place at the time, this breach is believed to have been a singular occurrence that will not be repeated as copper is not currently used in the Sections Mill process.

Should you require any further information regarding the above, please do not hesitate to contact me.

Yours sincerely



Jessica Richards

Environmental Graduate