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30th January 2023

Mrs E A Parr
PPC Compliance Assistant
Natural Resources Wales
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Our Ref: w:\Environmental\IPPC\Environment Agency Reporting\Permit Reporting\Rod and Bar Mill\1. Returns\NRW\3. Annual\2022\BV0759IC 4.1.4 Annual return 2022.docx

Dear Mrs Parr,

RE: Rod and Bar Mill EPR Permit BV0759IC 4.1.4 Annual Returns 2022

In accordance with CELSA Manufacturing UK Ltd Environmental Permitting Regulations (EPR) Rod and Bar Mill Permit BV0759IC, 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 Rod & Bar Mill are from:

- 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. Process contributions to the building air are minimised through the use of LEVs and through operating procedures aimed to minimise dust.
- The 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 and do not have LEVs 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

During 2022, there have been no fugitive releases to air from the permitted activities or any complaints regarding fugitive emissions related to the furnace refractory works at the Rod and Bar Mill.

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, which is in the form of large solid pieces and therefore does not generate fugitive emissions. Ceramic fibres are dealt with under specific health and safety requirements, double bagged and sealed prior to being disposed of offsite.

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 is not 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.

During the January 2022 shutdown, refractory maintenance work was carried out. This included a renewal of the original 1975 re-factory furnace entry door section. This improvement measure should reduce furnace heat loss and therefore, increase efficiency. In addition, within the furnace gas seals were renewed from mild steel to stainless steel. Thus creating an effective seal to eliminate heat loss and improve efficiency. Additionally, the furnace hearth was renewed this year. This increases the process efficiency by improving the positioning of the billets more effectively and reducing any delays in production.

1.2 Scale Removal from the Furnace

No complaints have been received regarding scale removal from the furnace at the Rod and Bar Mill during 2022. Every week, scale is removed from the furnace hearth via the furnace access doors. The scale is manually scraped into handling bins before being emptied into a dedicated scale skip. Fugitive dust is not typical from the scale, as the flakes are typically large, dense particles. Scale accumulating on the floor of the furnace is removed during shutdown periods. The scale flakes are large, dense particles that are not prone to dust generation.

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 hard standing. There have been no changes or complaints regarding these activities in 2022.

Drainage and Other Sub-Surface Structures

The sub-surface structures on site comprise of the basement lubricating oil and oil storage areas and an underground rainwater surge tank; additionally, there are no underground storage tanks at the Rod and Bar Mill. The cellars were constructed as part of the foundations of the process and consist of reinforced concrete, which provides an impervious layer with an average thickness of 300mm, with all floor levels below ground level and no drains are present in any of the cellars. The cellars are significantly larger in volume than the sum of the individual tanks within them, and as such any spillage would be contained.

The discharge point for water from site into East Bute Dock is fitted with a penstock valve that has been chained to prevent water being discharged without authorisation. This discharge valve has been closed for the duration of 2022. All water used in the process is recirculated within the water treatment system on site.

There are no other underground storage tanks on site. Surface drainage from areas of hard standing runs to the combined surface/foul sewer.

There have been no changes to these activities, however; CELSA received three complaints from Natural Resource Wales (NRW) during the months of August to October concerning fugitive release to water. They originated from local residents regarding concerns about possible pollution in East Bute Dock and the nearby canal. Upon request from NRW, CELSA carried out a dye test of the Rod and Bar Mill water system on the 2nd of September 2022 with the Site Inspector present. It was confirmed no dye was detected in East Bute Dock following the dye test. Feedback from NRW states they were satisfied that the test proved no effluent was being released from CELSA's discharge point. Therefore, these complaints were classed as unfounded.

Secondary Containment

No changes have been made to the secondary containment. All storage containers of oils and chemicals are stored with containment in place. 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, where bund inspections are also conducted. All fill points are within the bunded areas. There have been no changes or complaints regarding these activities in 2022.

In conclusion, as there have been no changes to any of the above activities relating to secondary containment during 2022.

Should you require any further information regarding permit condition 4.1.4 and these works please do not hesitate to contact me.

Yours sincerely

A. Jones

Abbie Jones
Environmental Graduate