

Compliance Assessment Report CAR_NRW0041074

Permit being assessed: BV0759IC.

For: Cardiff Rod & Bar Mill EPR/BV0759IC, held by Celsa Manufacturing UK Ltd
At: PO Box 83 Cardiff Rod & Bar Mill Castle Works , East Moors Road, Tremorfa, Cardiff, South Wales, CF24 5NN.

Type of assessment carried out: Report/Data Review, Reason: Routine.

On 31/12/2022.

Parts of permit assessed: Annual Review

NRW Lead Officer: Richard Taylor.

Report sent to: Hannah Powell, Environmental Manager on 06/02/2023.

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

BV0759IC Celsa Rod and Bar Mill

Site sent their annual returns through to NRW on time. These have been assessed and comments made as follows.

Annual Returns

- A2, EW1, R1 & PI1 – Received on time.
- Form A2 reports NO2 emitted at 41.2 tonnes. No permit limit applies.
- Form EW1 reports energy use and water consumption.
- Form R1 reports waste records. Millscale consists of approximately 50% of the total wastes produced by site. Site produced 19,828 tonnes of waste of which 9,907 tonnes was Millscale which is further processed in stages on site and used back into the furnace or sold. There were also 9,652 tonnes of scrap metal. Only 8.86 tonnes of general waste were finally disposed of during 2022. Site recovered 72.74 tonnes of hazardous waste and 19,746 tonnes of non-hazardous waste. Site accounted for all waste from site down to a 1/100th of a tonne which is exemplary.
- Form PI1 reports tonnes product against oil, water, and NOx from 2018 to 2022 inclusive. The general pattern being that site is showing a drop in water use from 207 ltrs per tonne to 62 ltrs. Oil and NOx are comparatively similar.

Pc 4.1.5 EMS Annual Improvement Targets

- The R&B mill had a gas usage target of 365kWh/tonne product for 2022 and returned a 394kWh figure. This is approximately 0.9% over the schedule and put down to lost efficiencies in the movement of molten steel to the mill.
- The electricity KPI was also exceeded with 105.69kWh/t against a target of 99.4. This is approximately 5% over target.
- Site met the KPI for oil use returning a figure of 0.44ltr/tonne/month against a target of 0.48. This is an approximate improvement of 9% and is commendable.

Pc 4.1.4 Fugitive Emissions annual review.

- Fugitive sources could emit from 2 main sources, the roof vents over the cooling beds and the water treatment system. Site reported no fugitive emissions from the site during 2022.
- Additionally, site has the potential to release substances from chemicals and oil storage. Site conforms to the Water resources (control of pollution) (Oil storage Wales) regs 2016 and carries out monthly checks on the integrity of the storage bunds and containers in which they sit.
- Extensive work took place to ascertain the integrity of the water recirculation system during 2022. Site has not made releases to the dock throughout 2022 which contained levels of substances above the permit limits. Additionally, NRW witnessed a dye tracing exercise which tested the seals around the release point which concluded that these were intact and that the 2 oil on water complaints made against the site during 2022 were unsubstantiated. The monthly monitoring results are discussed below.

Pc 2.8 Accident Prevention and Control.

- The permit requirement is for the plan to be reviewed 2 yearly or after an incident. Neither of which is applicable to the 2022 reporting period because site last submitted the form in 2021.

Pc 2.7 Energy Efficiency

- Site has submitted performance data on the annual returns listed above. There was in past years a requirement to submit a separate report for 2.7 energy activities, but this is not required as long as the annual data is reported, and site inspections occur which check the status of the following measures such as cladding. This requirement may change if the site gains a new NRW Inspector.
- This permit requirement is largely self-policing in the competitive market where losses due to

inefficiency result in the site being less competitive. This is particularly apt at the time of writing due to the current energy crisis and rising energy costs.

Site are reminded that H2 guidance on efficiency is available. This emphasis areas which may need to be revisited such as.

- i. Maintenance plan – which identifies heat or energy losses and carries out timely repairs.
- ii. Seals, lagging, self-closing doors – all in place, and upgraded where necessary.
- iii. Control switches to avoid unnecessary discharges of heat bearing substances.
- iv. Having an energy efficiency plan in place which identifies energy saving techniques (BAT).
- v. Additionally – site to continue to investigate reuses of heat from operations.
- vi. Site would also benefit from evaluating schemes of renewable energy generation from site sources i.e., roof mounted solar panels, battery storage, and the use of the nearby wave power generation.

Permit issues during 2022

- NRW agreed to the temporary storage of 300 tonnes EAF dust from the meltshop (permit TP3639BH) in the mill. This was due to shipping delays.
- There was a delayed air quality sample from A5 stack from Q4 2001 which occurred in Q1 2022. Improvements in contingency for the sampling team has subsequently been built in.
- No results for the metals content were returned for the monthly water sample for April. This was reportedly due to a mix up with the lab and the water contractor.
- The Water and Air emissions were examined in May through the OMA audits. Several improvements were recommended. Monthly metals results were re-established from May onwards. No penalty is applied due to the site's prompt response.
- W1 results for dissolved iron were reported as '<0/020'. Care should be taken with reporting submissions. The figure should have been <0.020.
- Site exceeded the mineral oil on water limit of 5mg/l with 5.47 in Jan, 17.5 in Apr, 12.0 in May, 5.42 in June, 7.17 in November and 5.68 in December. No releases to the dock occurred. The water is recirculated on site and only released through W1 to the dock when readings are below permit limits.
- The monthly water sampling results for Suspended solids, pH, Nickel, Chromium, Chlorine, zinc, and iron were all inside permit limits.
- Site had an OMA to Water and Air in May 2022 and is due another in 2026.
- A dye tracing exercise occurred in September which confirmed the seals around the W1 release point were intact and that site water was not leaking into the dock.

Complaints received during 2022

The Rod and Bar mill received 5 complaints through NRW's national reporting system during 2022. Two of these were related to oil sheen on the nearby dock. One complaint regarded noise, which was found to be unsubstantiated. The 4th complaint was for a metallic odour which was also unsubstantiated. WIRS 2208547 received on 29th Nov 2022 was for odour which was unsubstantiated. WIRS 2208947 received 22nd Dec was for chronic low pitched frequency noise. The complainant was asked to keep a diary of the events for comparison against site records but has subsequently been unavailable since the new year and has not been

in contact. Therefore, the complaint is also unsubstantiated.

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Quarterly Reports.

- NRW received all Quarterly reports for emissions to Air and Water within the permitted time limit.
 - The quarterly NO_x readings averaged 220 mg/m³ against a permitted maximum of 400mg/m³.
 - The parameters for oil on water were exceeded in Q4 as discussed above. The other limits were not exceeded. The highest suspended solids monthly reading in 2022 was 38mg/l against a limit of 80. Free chlorine has a limit of 0.1mg/l which was matched on several monthly returns but not exceeded. Site returned a low reading for pH in April 22 with 6.1 against a limit of 6.0. The other parameters from metals were below 1% of their permit limits.
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Annual Subsistence charge for 2022.

There are no scoring non-compliances to the site permit during 2022. The site has recorded limit exceedances but has not released polluting substances over permit limits to the environment and has been thoroughly audited through OMA in May.

The potential non-compliance for not submitting metals content in the April water sample return has not been applied due to the site's immediate response, and because the overview of the 2022 performance would mean that a score for this would have the effect of moving the site from a Band A performer to a Band B, which would effectively carry a 5% extra charge.

This is seen as disproportionate in this instance and has therefore not been applied. This means the site will be charged as a Band A performer for the next billing run and receive a 5% effective discount in their annual subsistence fee.

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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.