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6 March 2023

Our Ref: 021-1892 Celsa Shredder NRW Response March 2023 REV00

Dear William,

Re: Information is Missing - Response (Application number: PAN-018725)

Thank you for providing the letter (Your ref: PAN-018725, EPR/TP3639BH/V010) on 09/02/2023.

As agreed, (by email) on the 22/02/2023 the response date for the requested information was extended from 10 days to 25 days with a submission on or before 25/03/2023.

Our formal response has been structured around the further information requested by NRW to allow the application to be duly made.

NRW Request 1 – Pay the additional fee associated with a substantial variation. You have applied for a normal variation. However, as you are adding a new Part A1 installation activity (S5.4 Part A(1)(b)(iv)) to your permit, as stated in section 2.1.1 of the main installation report, this would make the variation a substantial variation (as per our guidance RGN 8). This means that the application fee is now £22,388.00 so you will need to pay the difference of £11,194.00.

Celsa has made the additional payment using the PAN-018725 - EPR/TP3639BH/V010 reference. This was made on 22/02/23.

NRW Request 2 – Provide more information on the noise impact assessment in order that it fully meets the requirements of BS4142 and the environmental agencies guidance Noise and vibration management: environmental permits - GOV.UK (www.gov.uk). This includes but not limited to, the additional information on;

- Dates and times that all of the measurements were taken.
- Weather conditions including wind speed and direction at the time that both the ambient and background measurements were taken at the specified locations.
- Provide more justification of using the noise levels recorded at location NAL03 as a representation for location NAL04
- Provide more justification for assessing the specific sound levels (derived from ambient measurement taken in 2021) against older background data from a previous noise assessment instead of using background noise level from the same time period.
- Calibration date and certificate for equipment used for the noise measurements.

The noise impact assessment was undertaken by Entran Ltd (Ref. 021-1892 E3195 Celsa Noise Impact Assessment Report_v1-1) to conform with the requirements of BS4142 whilst also incorporating EA Noise and Vibration Guidance. With regards the specific requests:

- The background sound survey was undertaken in May 2019 as part of the existing permitting application report. The ambient noise survey was undertaken in April/May 2021.
- Weather data has not been presented within the assessment as the data was obtained as part of the existing permitting application and therefore commentary on the derivation of these values is not warranted. The background sound levels are as previously accepted by NRW within the previous permitting application, dated March 2020.
- The levels are based on location NML3 as detailed within the previously accepted permitting variation. NML3 was positioned at a similar distance from the commercial estate to that of NAL04, which is further from both the industrial estate and the nearest roads than NAL03. Ambient and background noise levels at NAL03 may therefore be higher than those obtained at NML3. Accordingly, adopting the measurements at NAL03 would likely result in a more cautious assessment at this receptor position.
- The ambient measurements have been adopted only for consideration of the change in extant ambient noise levels and to inform consideration of the perceptibility over the extant environment. The specific/rating levels have been calculated as detailed within the assessment. The background sound levels obtained in 2019 were previously accepted by NRW and have been adopted on this basis. Notwithstanding this, the 2021 survey identified an increase in ambient noise levels when compared to the 2019 survey.

Accordingly, adoption of the possibly lower background sound levels would provide a likely cautious assessment and is considered to be appropriate.

- Calibration certificates have been provided within the respective assessment/reports. The data adopted for the assessment has been obtained from the existing reports and therefore no additional calibration certificates are required.

NRW Request 3 – Provide more information on the dust management plan explaining what mitigation measure you have if dust suppression fails. This includes low water supply in drought conditions.

As there is no continuously active dust suppression system systemic failure is very unlikely. Most of the controls relate to active management practices that are aligned to the BAT requirements. If everything fails (very unlikely) the ultimate mitigation measure would be to stop work.

Low water supply (during drought conditions) could represent an issue on a site where water is utilised for cleaning and dust suppression purposes. However, the Rover Way operations utilise a groundwater borehole (abstraction licence Ref. 21/57/25/78) for process cooling and dust suppression. Historically this remains available and falls in water level are unlikely (even during extended pump tests).

Zenith International who conducted the last operational testing as part of the 2014 groundwater variation concluded:

It is clear from the pumping test that groundwater levels across the site respond extremely quickly to pumping operations, recovering almost immediately to steady state conditions following pumping cessation. Groundwater drawdown is not significant during pumping and when abstraction is increased, drawdown does not drastically increase.

The associated Water Features Survey identified no groundwater dependent features within the specified 500 m radius.

NRW Request 4 – Provide more information on the fire water containment, particularly the approximate maximum time that is needed to close all of the penstocks after detecting a fire.

Upon detection of a fire, either visually or through activation of the fire alarm, the penstocks (north and south) will take an estimated 5 minutes to close. This is a manual process. All operators will be suitably trained to ensure all appropriate penstocks are closed prior to the deployment of fire water. The presence and closure of the penstocks will be communicated to the fire brigade upon their arrival at site.

NRW Request 5 – Please provide a surface water risk assessment in line with Surface water pollution risk assessment for your environmental permit - GOV.UK (www.gov.uk) on pollutants from the new proposed surface water discharge point S6.

As a result of the revised discussions with Cardiff Council and the SuDS Approval Body (SAB), since our call on 09/02/2023, the drainage strategy has been revised (Ref. Issue 3, 17/02/2023). The previous agreed SAB design included a new SPEL Purceptor P065/1CSC Full Retention Class 1 Separator connected to a new point source emission to surface water (Point S6). SAB/the Council has now refused to allow the use of separators on-site. All surface water will now drain into the filter strip systems that contain the SDS Aqua-Xchange (performance data sheet provided).

It is important to remember that these drainage changes have solely resulted due to the proposed public road and associated buffer zone required by Cardiff Council.

NRW Request 6 – Provide more information on Section 7.3 of the preliminary drainage strategy report. What test (if any) are proposed (outside the annual inspection) on the filter medium strip to check if aqua-Xchange is performing as expected.

According to James & Nicholas (Structural & Civil Engineering Design) there is no test available to see if the aqua-Xchange is performing as expected. The material will be enclosed in a filter strip that will infiltrate at the base of the cellular soakaway, which will be underneath a 250mm thick fibre reinforced slab. Therefore, testing the water quality will be impossible. The performance lifespan of the material will be guaranteed by the manufacturer.

NRW Request 7 – Let us know if you want to add a waste code to the permit: On page 20 of the main report, it is stated that no new waste codes are being added however table 3-1 (under section 3.2) list 12 01 04 (Non-ferrous metal dust and particles) which is not currently listed in the most recent permit (V009). Please can you specify which table in the current permit the waste code will fall under, noting that in the current permit waste accepted under Table S2.5 (Permitted waste types and quantities for metal recycling site (mixed MRS)) does not allow the acceptance of waste that is solely or mainly dust or sludge.

Given it has been 7 months since the submission of the permit application the business has reviewed and revised the requested waste codes it would like to be associated with the shear, shredder and ELV processing area. The requested changes are required to reflect market conditions and the availability of suitable and sufficient waste streams within the current market.

A new standalone attachment has been provided (Ref. 021-1892 Celsa Cardiff Shredder Variation - EWC Codes REV00) which maps out all current waste codes within permit V009 and the requested codes to be associated with this variation. We've also indicated how the waste codes will be associated with the varied activities:

Celsa Manufacturing (UK) Ltd

- Input (waste code) for shredding;
- Input (waste code) for other processing operations and/or transfers;
- Movements sent to the Electric Arc Furnace (EAF) and/or other Celsa processes;
- Export (removed from site) for further off-site treatment and/or disposal.

The required List of Waste (LoW) codes for Schedule 2 Table 2.6 are provided within the document.

NRW Request 8 – Clarify if there will be a new point source discharge to surface water. The nontechnical summary (NTS), section S09, states that there are no new point source emissions to surface water from the installation but the main installation report states (in section 9.2) that there will be an additional point source emission to surface water (S6) with a oil/water interceptor. Please confirm which document is correct and amend the other document(s).

This was an error in the report. But, in-light of the recent SAB requests (no on-site separators) there will in fact be no new point source discharges to surface water.

The amendments to the variation application are summarised in *Annex A*.

I trust that the above information is satisfactory, but if you have any queries on this matter, please do not hesitate to contact me.

Yours sincerely,



Michael Sylvester
EAME Manager

Annex A: Variation Application Amendments

Amendments to Permit Variation

Table A1: *Permit application changes*

| Change | Justification and Comments |
|--|---|
| All documentation changed to reflect substantial variation rather than normal variation. | Due to NRW comments within PAN-018725, EPR/TP3639BH/V010) on 09/02/2023. |
| Air and Noise Model Files | No changes. |
| Application Forms | Change of document reference numbers REV00 to REV01 and addition of case no. (1a), PAN-018725. Updated to reflect the updated fees for the substantial variation. |
| BAT and Impact Assessments | No changes have been made to the following documents: <ul style="list-style-type: none"> 021-1892 Celsa Boundary Dust Monitoring Survey FINAL 021-1892 Celsa Cardiff Variation - Fugitive Dust Assessment REV00 021-1892 Celsa Shredder Air Quality Risk Assessment REV02 021-1892 E3195 Celsa Noise Impact Assessment Report_v1-1 The 021-1892 Celsa Cardiff Variation - BAT Assessment REV01 and 021-1892 Celsa Cardiff Variation - General Risk Assessment REV01 have been subject to review and update. |
| Certification | No changes. |
| Consultation | A PDF version of this letter is now included within the submitted information. |
| Drainage Strategy | Fully revised document and plans in-light of the proposed changes enforced by the possible redevelopment and expansion of Rover Way by Cardiff Council. FCA and Filter Media - Aqua-X-change-Datasheet remain unchanged. |
| Ecology Survey | Celsa Shredder PEA April 2022 remains unchanged but there is an additional letter (submitted to the LPA) stating that the new changes do not (significantly) alter the previous report findings. |

| Change | Justification and Comments |
|--------------------------|---|
| Equipment Technical Data | <p>The final supplier for the proposed shredder has been selected using Celsa's internal procurement processes. A new shredder technical specification document is now provided within the application package. The folder now contains:</p> <p>021-1892 0311_001 Final Shredder Layout</p> <p>021-1892 57198M OC Celsa Cardiff Lindemann Signed_Redacted (prices removed for commercial reasons)</p> <p>021-1892 Emission Point A11 Stack Design REV00</p> <p>021-1892 Shear-LIDEX 1000 tonne Technical Specs</p> |
| Figures and Plans | <p>The following plans have been edited to account for the changed layout due to the Cardiff Council Rover Way proposals:</p> <p>021-1892 Figure A3 Proposed Site Layout REV01</p> <p>021-1892 Figure A4 Proposed Shredder Layout REV01</p> <p>021-1892 Figure A6 Drainage and Surfacing REV01</p> <p>021-1892 Figure A8 Schedule 7 - Site Plan REV01</p> <p>Additional plans provided:</p> <p>021-1892 Figure A9 Vehicle Tracking Layout REV00</p> <p>021-1892 Figure A10 Proposed Elevations - Shredder REV00</p> <p>021-1892 Figure A11 Proposed Amenity Block Plan and Elevations REV00</p> |
| General Information | No changes. |

| Change | Justification and Comments |
|--------------------------|---|
| Main Installation Report | <p>The following changes have been made:</p> <ul style="list-style-type: none"> • Additional paragraph (p3) inserted to reflect NRW letter and discussions held on 09/02/23. • Additional paragraph (p4) added: <i>If, at some time in the future, Cardiff Council propose to implement the Rover Way improvement Scheme Celsa will apply for and amend the permit boundary. As no timescale for the Rover Way improvement scheme has been stated Celsa would propose to maintain the current permit boundary. This approach was discussed with NRW (09/02/23) and it was agreed as acceptable.</i> • Table 1-3 (Application Documents) has been revised to show the revised submitted documentation. • Figure 2-2 updated to remove S6 (no longer required). • Figure 2-3 revised to show new layout. • Section 3.2 requested waste codes moved to standalone document (Ref. 021-1892 Celsa Cardiff Shredder Variation - EWC Codes REV00) • Figure 3-2 revised layout. • New section 3.7 (Noise Enclosure) added to report. • Figure 4-1 revised layout due to Cardiff Council Road. • Table 7-1 revised due to new layout. • Table 7-2 revised due to new layout. • Figure 9-2 revised due to new layout. • Section 9.2 revised, no requirement for S6. • Section 9.5 revised due to drainage strategy changes. • Section 11.2 revised, no monitoring of discharges to surface water now required. • Drainage systems have been revised in-light of the SAB/Cardiff Council requirements. <p>New document provided summarising the current and proposed waste codes associated with the permit (Ref. 021-1892 Celsa Cardiff Shredder Variation - EWC Codes REV00)</p> |

| Change | Justification and Comments |
|----------------------------|---|
| Management Plans | <p>No changes have been made to the following draft management plans:</p> <ul style="list-style-type: none"> • ECPXX Shredder and Shear - Deflagration Management Plan - Rev 0 • ECPXX Shredder and Shear - Dust Management Plan - Rev 0 • ECPXX Shredder and Shear - Noise and Vibration Management Plan - Rev 0 <p>The draft ECPXX Shredder and Shear - Fire Prevention Management Plan - Rev 0 has been subject to review and update.</p> <p>Please note that all management plans remain as Rev 0 until adoption into the Celsa management system.</p> |
| Non-technical Summary | Revised in-light of the Cardiff Council Rover Way proposals. |
| Opra Assessment | No changes. |
| Site Condition Report | Revised in-light of the Cardiff Council Rover Way proposals. |
| Sustainability Assessments | No changes. |
| Technical Competence | No changes. |