

Compliance Assessment Report CAR_NRW0041131

Permit being assessed: BV0767IT.

For: Cardiff Section Mill EPR/BV0767IT, held by Celsa Manufacturing UK Ltd

At: Section Mill Tremorfa Works , Cardiff, CF24 5TH.

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

On 31/12/2022.

Parts of permit assessed: Annual Returns

NRW Lead Officer: Richard Taylor.

Report sent to: Hannah Powell, Environment Manager on 10/02/2023.

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

Celsa Sections Mill

EPR Permit BV0767IT

2022 Report Review

The CAR form is a review of the 2020 quarterly and annual submissions for this site.

Annual Returns 2022, A2, EW1, R1, PI1.

Site sent the annual reports before the deadline. Form A2 reported emissions of Nitrogen Oxide and particulate matter as being down on previous years (in kg). Sulphur dioxide and carbon monoxide figures were up. These figures are reported separately to the quarterly stack monitoring figures which carry some limits whereas no limits are applied to the reported figures in A2.

EW1 shows the energy and water use for 2022. Electricity use was similar to previous years whereas gas was down, and process water was up on trend.

Form R1 showed that site produces very little waste which reaches final disposal. Good recycling and recovery operations are in place. Of the 19,233 tonnes of waste the site produces, only 13.1 tonnes of general waste are sent to landfill which is commendable. Nearly three quarters of the 19kt is scrap metal which is used in the meltshop process or sold. The next largest fraction ~4kt is Millscale which is further processed and also used in the system or sold. Trends for waste produced is up on previous years, but recycling/recovery is also up.

Form PI1 reports KPI figures and includes a list of the site's performance since 2011 so that trends can be clearly seen. Water use has risen fourfold per tonne of product. Oil use has also doubled over the period. NOx production has fallen with site recording their lowest return in the last 11 years. Sox however is the opposite, showing the highest output since 2011.

Pc 4.1.5 EMS Target Review Report

Gas - The gas consumption target of 420.9 kW/tonne was missed with the site reporting 441.68 kW/tonne for 2022. This was an improvement on previous year's figures but still a 5% approx. overshoot. Site has introduced specific batch heating strategies as well as greater efficiencies during the process during 2022 as well as working on smoothing out bottlenecks such as door catch points and minimising door opening times. These improvements have led to less heat being lost through openings and through poor insulation. Improvements to the pyrometer readings also contributed to greater control and less gas being used.

Electricity - The electricity target was met with site recording a figure of 84.52kWh/tonne/month against a target of 85 kWh/tonne. Products are largely bespoke meaning that energy use can be sporadic and good management needs to be in place to meet this KPI. Site has introduced LED lighting which is a welcome improvement as well as variable drives to the substations. The meeting of this target is a commendable achievement by site. For reference the last reported figure for 2021 was 92.3kWh/tonne/month average.

Water - Water was not included in the report. This has been included in previous years. However, this KPI can be calculated from the site returns where site reported 94.909m3 of process water against a product figure of 241,375 tonnes of product. This is calculated at 0.393m3/tonne product. A previous KPI target for 2021 was 0.35 which places the 2022 figure in excess of this target. Site needs to include this water KPI in future reporting.

Oil - Oil per tonne figures were 0.91 litres per tonne for 2022 against a target of 0.57l/tonne. This is lower than the 0.96 figure reported for 2020 but still shows a rising trend. Site needs to set targets which are realistic and achievable. For reference the average figure for the past 5 reporting years is 0.82. A more realistic target would be expected to be below 0.75.

Pc4.1.4 Fugitive emissions review

NRW received no complaints against this site in 2022.

The report lists the 3 main sources of potential fugitive emissions. These are listed with a total of eleven emission points in the permit at table 2.2.1. Stack A1 is the only point source with emissions limits for air. Point S1 is the emission point to sewer which has a separate discharge consent from Dwr Cymru.

Site has previously reported a high copper reading in their discharge. However, there is no limit placed in the site permit for copper, so no permit breach occurred.

Pc 2.8.1 Accident Prevention Plan

Site are required to submit a reviewed plan 2 yearly. The last one received was on 28th Jan 2022. The next one is due next year.

Outstanding Issues

The quarterly return for the A1 stack reported a high-reading for-carbon monoxide. Carbon monoxide is a colourless, tasteless, odourless, non-irritating gas produced as a by-product during incomplete combustion of fuels due to there being insufficient oxygen present. There is no permit limit for CO, but it is an indicator of the combustion efficiency of the process. It can also lead to exposure by the workforce to high CO.

Site have been asked to verify the stack emissions test to ascertain whether there was a mistake in the reported figure and send NRW a copy of the stack testers report.

Furthermore, site needs to check on the combustion efficiency of the plant as well as ensuring that personnel are not exposed to higher-than-normal levels of CO in the workplace. For reference the average reported quarterly figure is 122.0mg/m3 against a Q4 figure of 5000mg/m3.

Action – Check the stack report figures are correct for A1 stack CO from Q4 2022.

Action – as a precaution, ensure exposure levels of the workforce to elevated CO levels is not occurring – take URGENT action if this is the case.

Action – Check the combustion efficiency balance is correct so that elevated CO is mitigated.

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.