

31<sup>st</sup> January 2019

Mrs E A Parr  
EPR Compliance Assistant  
Natural Resources 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\2016 \4.1.5  
Annual Returns 2018.doc

Dear Mrs Parr,

**RE: Section Mill EPR Permit BV0767 4.1.5 Annual Returns 2018**

In accordance with CELSA Manufacturing UK Ltd Environmental Permitting Regulations (EPR) Section Mill Permit BV0767, permit condition 4.1.5 requires the following:

*4.1.5 Where the Operator has a formal environmental management system applying to the Permitted Installation which encompasses annual improvement targets the Operator shall, not later than 31 January in each year, provide a summary report of the previous year's progress against such targets.*

The following information summarises the CELSA's Section Mill EMS Objectives and Targets for 2018.

**1.0 Reduce gas consumption (kWh/tonne) by 3% based on 2017**

This objective was to reduce gas consumption to 422 kWh/tonne at the Sections Mill.

Unfortunately, the Sections Mill could only achieve a consumption of 428 kWh/tonne. The main issue is the large range of products and resulting high number of changeovers, which affects efficiency of the furnace. Similarly, the vast product changeovers affect the ability to fully implement 'hot charging' within the mill.

The gas consumption target for 2019 has been set to 420.9 kWh/tonne.

**2.0 Consume no greater than 88 kWh/tonne of electricity in 2017**

The objective was to keep consumption at 88 kWh/tonne; unfortunately, the Sections Mill was unable to do this, missing the target by 6%, with an average 94 kWh/tonne of electricity in 2018.

A target to consume no greater than 87 kWh/tonne of electricity has been set for 2019.

### **3.0 Reduce general waste production (tonnes per month) by 5% compared to 2017**

The Sections Mill achieved the target, by only producing 5.45 tonnes of general waste per month.

The improvements, such as improved communication through signage, put forward from 2017 were successfully implemented as seen in the results from 2018. Moving forward, actions from monthly walkabouts will continue to be recorded on ProSafety, with a push for waste segregation. Further efforts are being implemented to remove wood and mixed recycling from the general waste stream. In addition, pre-shutdown discussions are aimed to ensure that any other waste streams are appropriately segregated and not sent off site as general waste.

A general waste target has been set for 2019 at 5.18 tonnes per month.

### **4.0 Reduce commercial water consumption (m<sup>3</sup>/tonne per month) by 3% compared to 2017**

The objective was to consume no greater than 0.29m<sup>3</sup> per tonne per month of commercial water in the Sections mill. The Sections Mill surpassed this target, with a figure of 0.11m<sup>3</sup>/tonne per month.

The commercial water consumption target has been set to no greater than 0.2m<sup>3</sup>/tonne in any month for 2019.

### **5.0 Reduce oil consumption (l/tonne per month) by 10% compared to 2017**

This objective was to consume no more than 0.30 litres/tonne of finished product (per month) at the Sections Mill. Unfortunately, the Sections Mill did not meet the target, consuming 0.64 litres/tonne per month on average.

An oil consumption target of 0.576 litres/tonne has been agreed with the engineers for 2019, which will be a 10% reduction compared with 2018.

### **6.0 Train 100% of applicable employees in the Emergency Spillage Response Training (% employees)**

The Sections Mill missed their target, with only 61% of employees having completed the training. There will be renewed focus in Q1 2019 to catch up on the outstanding employees to ensure 100%.

Should you require any further information regarding these objective and targets please do not hesitate to contact me.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'G. Nizam', with a horizontal line underneath the name.

**Gabriella Nizam**  
**Environmental Advisor**