

02 APR 2019

Cardiff

Permit Receipt Centre
Natural Resources Wales
Cambria House
29 Newport Road
Cardiff
CF24 0TP

28th March 2019

Our ref: MS/SPR/018-1620 Celsa Cardiff EPR Shearing Limit Increase REV00

Dear Permit Receipt Centre,

Re: Environmental Permit Minor Technical Variation (Permit No. EPR/TP3639BH)

Introduction

This document has been prepared by Celsa Manufacturing (UK) Ltd ("Celsa") and its environmental consultant Earth & Marine Environmental Consultants Ltd ("EAME") in support of a permit minor technical variation as required under Regulation 20 of the *Environmental Permitting (England and Wales) Regulations 2016* in relation to current activities and proposed activities to be undertaken at Tremorfa New Melt Shop, Tremorfa Works, Seawall Road, Cardiff, CF24 5TH (Permit No. EPR/TP3639BH).

The Authorised company contact is Mr. Richard Lewis (Celsa Manufacturing (UK) Ltd, Environmental Manager). The authorisation to submit the variation application is provided in *Appendix B*.

Proposed Variation

The scope of this variation concerns the current scrap metal shearing limit stated in Permit No. EPR/TP3639BH. Shearing was added to the New Melt Shop permit as a variation in June 2017 (Ref. EPR/TP3639BH/V006). As the existing shear is mobile plant NRW agreed that it can be utilised anywhere within the installation boundary. Given predicted future processing volumes Celsa wishes to increase the amount to 5,000 tonnes per month from the current 1000 tonnes per month.

The proposed amendment relates to Table S1.1 (A3) within the current permit which states 'shearing of up to 1000 tonnes of scrap metal per month prior to submission to the scheduled

activity'. As discussed above Celsa wishes to increase this limited to 5,000 tonnes of scrap metal per month to allow more flexible processing. The suggested revision is outlined in **Table 1** (Activity A3).

Table 1: Proposed Schedule 2 (Operations) Changes – Table S1.1

Activity Ref.	Activity listed in Schedule 1 of the EP Regulations	Description	Limits of specified activity and waste types
Table S1.1 Activities			
A1	NO CHANGES	-	-
A2	NO CHANGES	-	-
Directly Associated Activities			
A3	Scrap handling and storage	Scrap unloading, sorting and storage. Loading into baskets and transfer to the furnaces.	- shearing of up to 5000 tonnes of scrap metal per month prior to submission to the scheduled activity
A4	NO CHANGES	-	-
A5	NO CHANGES	-	-
A6	NO CHANGES	-	-
A7	NO CHANGES	-	-
A8	NO CHANGES	-	-
A9	NO CHANGES	-	-
Notes: Existing text is outlined in 'black'. Text outlined in 'red' relates to the proposed changes outlined within this variation application (Ref. 018-1620).			

In order to progress the variation, the following information is provided which is aligned to the requirements of the application forms (i.e. Form A, Form C2, Form C3 and Form F) (**Table 2**).

Table 2: NRW Requested information

Information	Source	Response
Evidence of limited company status.	Form A (part 5)	Appendix B – 018-1620 Celsa Companies House Certificate. Appendix B also includes a letter to authorise submission of the variation application (Celsa Managing Director).
Non-technical Summary	Form C2 (2b)	The current environmental permit includes an existing mobile shear which NRW has agreed can be utilised anywhere within the installation boundary. Given predicted future processing volumes Celsa wishes to increase the amount to 5,000 tonnes per month from the current 1000 tonnes per month.
Summary of Management System	Form C2 (3d3)	No changes to the existing management system procedures as a result of the proposed variation.
Plans of the site	Form C2 (5a)	No new plans are provided as no changes to site layout, equipment or permit boundary are proposed.
Environmental Risk Assessment	Form C2 (6)	The current environmental risk assessments remaining valid and unchanged.
About the activities	Form C3 (1a)	No new activities or equipment is proposed as part of the proposed variation (i.e. it is just increased throughput using existing equipment).
Accept waste as part of your activities	Form C3 (1b)	No new waste types are to be accepted as part of the proposed variation.
Emissions to air, water and land	Form C3 (2)	No new emissions to air, water or land will occur as a result of the proposed variation.
Operating techniques	Form C3 (3a)	The operating techniques remain unchanged.
General requirements	Form C3 (3b)	No changes to the previously submitted H1 environmental assessment and noise and vibration management procedures is required.
Types and amounts of raw materials	Form C3 (3c)	No changes are required in relation to the current types and amounts of raw materials.
Monitoring	Form C3 (4)	No changes to current environmental monitoring are required as a result of the proposed change.

Information	Source	Response
Energy efficient	Form C3 (6)	No changes are required to the previously stated energy efficient measures.
Climate Change Levy	Form C3 (6c)	The agreement (Ref. UKSA/CELSA/N/00001)) remains in operation.
Raw materials, other substances and water use	Form C3 (6d)	No changes are required to the previously stated raw materials, other substances and water use.
Avoiding waste	Form C3 (6e)	The activity is waste treatment activity (shear) that contributes to increased scrap metal recycling rates through the effective size reduction of incoming scrap waste streams.
Appendix 5 – Non-hazardous and hazardous recovery and disposal sector	Form C3 (Appendix 5 – Q1)	No changes to pre-acceptance waste procedures.
Appendix 5 – Non-hazardous and hazardous recovery and disposal sector	Form C3 (Appendix 5 – Q2)	Pre-acceptance waste procedures are currently in-place and are aligned to SGN 5.06.
Appendix 5 – Non-hazardous and hazardous recovery and disposal sector	Form C3 (Appendix 5 – Q3)	Waste storage procedures (aligned to SGN 5.06) remain in-place. No changes are proposed.
Appendix 5 – Non-hazardous and hazardous recovery and disposal sector	Form C3 (Appendix 5 – Q4)	The activity will occur within the current permit boundary.
Appendix 5 – Non-hazardous and hazardous recovery and disposal sector	Form C3 (Appendix 5 – Q5)	No changes to the previously supplied information. Only change is an increase in shearing limit. Equipment and process remains unchanged.
Appendix 5 – Non-hazardous and hazardous recovery and disposal sector	Form C3 (Appendix 5 – Q6)	No changes to the previously supplied layout plans are required. The activity will occur within the current permit boundary.

Celsa Manufacturing (UK) Ltd

Environmental Permit (Minor Technical Variation)
New Melt Shop Permit No. EPR/TP3639BH

Information	Source	Response
Charges	Form F1 (1)	NRW current charging scheme states minor technical variation as £1,280.

I trust the information provide is sufficient to enable determination of the Minor Technical Variation.

Please do not hesitate to call me if you have any queries on this matter.

Yours sincerely,



Michael Sylvester
Manager

Annex A: Application Forms

Annex B: Attachments

Natural Resources Wales

26 March 2019

To whom it may concern,

Richard Lewis is appointed as the company Environmental Manager and is therefore the relevant person to apply for permit applications on behalf of Celsa Manufacturing (UK) Ltd.

Yours sincerely,



Luis Sanz

Managing Director