

NRW Permitting Service
Natural Resources Wales
Cambria House
29 Newport Road
Cardiff
CF24 0TP

12th December 2023

Our ref: MS/021-1892 Celsa Cardiff Permit Variation - Resubmission REV00

Re: Environmental Permit Application (Variation), Resubmission, Cardiff

Natural Resource Wales (NRW) requested that Celsa Manufacturing (UK) Ltd submit a change management record for the permit variation resubmission (*i.e.* the change from REV01 to REV02). In addition, (and where required) all documents have been updated to capture the additional information provided by Celsa to NRW during the previous determination process:

- Schedule 5-1 (PAN-018725 (EPR/TP3639BH/V011, 25/05/23);
- Schedule 5-2 (PAN-018725 (EPR/TP3639BH/V010), 23/06/23); and
- Schedule 5-3 (PAN-018725 (EPR/TP3639BH/V010), 31/08/23).

Environmental Permit Variation Tracker

All documents/folders included within the revised application (REV02) are outlined below in **Table 1**. Where line items are outlined in green there have been no changes from REV01 submission. Items outlined in red refer to the electronic file names for the changed or additional provided information.

Table 1: Permit Variation resubmission tracker

Folder	Status
Air and Noise Model Files	The noise impact assessment (and model files) was subject to review and update at the request of NRW (Schedule 5 PAN-018725 - EPR/TP3639BH/V010). The current version is now – E3590 - Noise Model_210723 . No changes have been made since NRW confirmed the assessment was acceptable.
Application Forms	Forms amended to referenced amended technical reports.

Folder	Status
BAT and Impact Assessments	<p>A series of sub-folders are now provided for the assessments.</p> <p><u>Air Quality</u></p> <p>No change.</p> <p><u>BAT Assessment</u></p> <p>021-1892 Celsa Cardiff Variation - BAT Assessment REV02 has been revised considering the changes to the drainage strategy. The current version is now – 021-1892 Celsa Cardiff Variation - BAT Assessment REV03.</p> <p><u>Flood Risk</u></p> <p>The Flood Risk Assessment (submitted for planning) has been included for information.</p> <p><u>Dust</u></p> <p>No change.</p> <p><u>General Risk Assessment</u></p> <p>021-1892 Celsa Cardiff Variation - General Risk Assessment REV01 has been revised considering the changes to the drainage strategy. The current version is now – 021-1892 Celsa Cardiff Variation - General Risk Assessment REV02.</p> <p><u>Noise</u></p> <p>The noise impact assessment was subject to review and update at the request of NRW (Schedule 5 PAN-018725 - EPR/TP3639BH/V010). The current version is now – E3590 - Celsa Noise Report.</p> <p><u>Sewer</u></p> <p>A copy of the current Welsh Water discharge consent (Tide Fields Road WWTP) is provided in the variation package Ref. Welsh Water Cardiff Bay Discharge Consent. This is provided for information only and relates to the final discharge point into the Severn Estuary (post- Welsh Water treatment).</p> <p>The folder now includes H1 assessments for the release to sewer (H1 Tool Version 2.78). This includes two versions (1) Assuming a release rate to sewer of 3.3 litres/second Ref. H1TOOL_2.78 - 3.3 litres per second and (2) 6 litres per second release rate Ref. H1TOOL_2.78 - 6 litres per second. As the discussions with Welsh Water are continuing, we felt it was advantageous to provide both assessments.</p>
Certification	No changes from REV01.
Consultation	No changes from REV01.

Folder	Status
Drainage Strategy	The fully revised (and NRW agreed) drainage strategy is included Ref. 231212 23105 Planning Drainage Strategy Report . We have also included the SAB submission Ref. 23105 Celsa Tremorfa Full SAB Application . The full set of supporting plans is contained within a single document Ref. Drainage Strategy Plans (Full Set) . A new subfolder of supporting information and datasheets is also provided.
Ecology Survey	No changes from REV01.
Environmental Management System	NRW comments associated with a Schedule 5 notice (NRW ref: PAN-018725 - EPR/TP3639BH/V010) requested further information on the Celsa EMS. These documents have been included within REV02 of the permit application.
Equipment Technical Data	No changes from REV01.
Figures and Plans	The updated figures and plans are: 021-1892 Figure A3 Proposed Site Plan REV01. The current version is now – 021-1892 Figure A3 Proposed Site Plan REV02 . 021-1892 Figure A4 Proposed Shredder Layout REV01. The current version is now – 021-1892 Figure A4 Proposed Shredder Layout REV02 . 021-1892 Figure A6 Drainage and Surfacing REV01. The current version is now – 021-1892 Figure A6 Drainage and Surfacing REV02 . Some additional drainage plans have been provided, they include: 021-1892 Figure A6-1 Drainage Cross Sections REV00 , 021-1892 Figure A6-2 Drainage Storage Tanks REV00 and 021-1892 Figure A6-3 Drainage Catchment Plan REV00 . The drainage plans are also provided within the standalone drainage strategy. 021-1892 Figure A8 Schedule 7 - Site Plan REV00. This plan has been updated to reflect the change in source for the discharge to sewer via S5 (from scrap centre to shredder/shear pad run-off). The location of S5 has also moved slightly due to the creation of a new sampling chamber. The current version is now – 021-1892 Figure A8 Schedule 7 - Site Plan REV01 . 021-1892 Figure A10 Proposed Elevations - Shredder REV00. The current version is now – 021-1892 Figure A10 Proposed Elevations - Shredder REV01 . The elevations have not changed but a plan (without the surface water storage tanks) has been removed. All other figures and plans remain unchanged from REV01.
General Information	No changes from REV01.

Folder	Status
Main Installation Report	The current installation report (021-1892 Celsa Cardiff Variation - Installation Report REV01) has been updated to reflect the changes to the drainage strategy and all NRW comments and requests associated with the Schedule 5 notices. The current version is now – 021-1892 Celsa Cardiff Variation - Installation Report REV02 .
Management Plans	<p>The original application included the following management plans and procedures. These were subject to review and update after NRW comments associated with a Schedule 5 notice (NRW ref: PAN-018725 - EPR/TP3639BH/V010). The status of the documents is outlined below:</p> <p>ECP Deflagration Management Plan (No changes).</p> <p>ECP69 Dust Management Plan Rev 1. This has been updated to reflect site layout changes. The current version is now – ECP69 Dust Management Plan Rev 2.</p> <p>ECP68 Fire Prevention Management Plan Rev 1. This has been updated to reflect site layout changes and the sewer discharge. The current version is now – ECP68 Shredder and Shear - Fire Prevention Management Plan - Rev 2.</p> <p>ECP70 Noise and Vibration Management Plan Rev 1. This has been updated to reflect site layout changes. The current version is now – ECP70 Noise and Vibration Management Plan Rev 2.</p> <p>ECP59 Tin Can Management Procedure Rev 3.0 (No changes).</p>
Non-technical Summary	The current NTS (021-1892 Celsa Cardiff Variation - NTS Report REV01) has been updated to reflect the changes to the drainage strategy. The current version is now – 021-1892 Celsa Cardiff Variation - NTS Report REV02 .
Opra Assessment	No changes from REV01
Planning Reports	<p>The following reports are provided for information.</p> <p>Ecological impact assessment – Ref. 220707_402.000010.00001 Celsa EcIA_Final</p> <p>Habitats Regulations Assessment (Screening) – Ref. 220707_402.000010.00001 Celsa HRA – Final</p> <p>Preliminary Ecological Appraisal – Ref. Celsa Shredder PEA April 2022 and Celsa Shredder ecology addendum letter Jan 2023</p>
Quality Management System	NRW comments associated with a Schedule 5 notice (NRW ref: PAN-018725 - EPR/TP3639BH/V010) requested further information on the Celsa QMS. These documents have been included within REV02 of the permit application.
Risk Assessments	NRW comments associated with a Schedule 5 notice (NRW ref: PAN-018725 - EPR/TP3639BH/V010) requested further information on the Celsa Risk Assessment process. These documents have been included within REV02 of the permit application.
Safe Working	NRW comments associated with a Schedule 5 notice (NRW ref: PAN-018725 -

Folder	Status
Procedures	EPR/TP3639BH/V010) requested further information on the Celsa procedures. These documents have been included within REV02 of the permit application.
Site Condition Report	021-1892 Celsa Cardiff Variation - SCR REV01 has been revised to include all previous investigation baseline data that was provided within Schedule 5-2 (Ref. PAN-018725 (EPR/TP3639BH/V010)). This provides a full and complete summary of all soil and groundwater data for the Rover Way site. The current version is now – 021-1892 Celsa Cardiff Variation - SCR REV02.
Sustainability Assessments	NRW comments associated with a Schedule 5 notice (NRW ref: PAN-018725 - EPR/TP3639BH/V010) requested further information on sustainability. These documents have been included within REV02 of the permit application.
Technical Competence	No changes from REV01.

Documents and Reports Removed

The documents and reports removed from REV01 (i.e. are no longer required) include:

- 021-1892 Celsa Cardiff Variation - Hydrogeological Risk Assessment REV00 and associated Consim Model files (Ref. Celsa_Two Layer.csm). Given the change in drainage strategy the groundwater risk assessment is no longer required and has been withdrawn. This has been agreed with NRW.

Yours sincerely,



Michael Sylvester (EAME Manager)