

Compliance Assessment Report CAR_NRW0044456

Permit being assessed: BV0759IC.

For: Cardiff Rod & Bar Mill EPR/BV0759IC, **held by:** Celsa Manufacturing UK Ltd

At: PO Box 83 Cardiff Rod & Bar Mill Castle Works , East Moors Road, Tremorfa, Cardiff, South Wales, CF24 5NN.

Type of assessment: Site Inspection,

Reason: Routine.

On: 22/04/2024 between 11:00 and 13:00.

Parts of permit assessed: Site visit / Quarter one returns.

NRW Lead Officer: Dale Padfield.

Report sent to: Hannah Powell, Environmental Manager, on 29/05/2024.

1. Summary of our findings (full details in section 4)

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR3B - Installations - Emissions and monitoring - Emissions of substances not controlled by emission limits	C3 Minor	2.2.7.2
IR1A - Installations - Management - General Management	C3 Minor	1.3.1
IR2A - Installations - Operations - Permitted activities	Assessed (A)	
IR3A - Installations - Emissions and monitoring - Emissions to water, air or land	Assessed (A)	
IR4B - Installations - Information - Reporting	Assessed (A)	

Result types are explained in more detail in the 'Important Information' section below.

Total non-compliances recorded	Total non-compliance score
2	8

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?

Criteria	Action needed	Complete by
IR3B	Ensure secondary containment measures are in place to capture leaks from the cooling tower.	Already completed
IR1A	Ensure staff are fully aware of environmental protection measures and procedures are in place to identify and limit environmental risk when undertaking maintenance work.	Already completed

Compliance criteria codes are listed in the 'Important information' section below.

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 Manufacturing UK Limited

Rod and Bar Mill

EPR/BV0759IC

Quarter 1 reporting returns

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The Quarterly stack emissions monitoring report for the A1 emission point was received on the 29/04/2024. NO_x was reported well within the permitted ELV's. The report is accepted.

Reporting form ~ W1 showed all parameters to be within the ELV's with the exception of total hydrocarbon oil where a value of 5.29 mg/l was recorded against an ELV of 5 mg/l. However, no water was discharged from the facility into the dock, as such there is no environmental impact from the ELV exceedance, and no non-compliance will be issued against the permit. Celsa should consider investigating the cause of the elevated oil to establish if any corrections are required to the ETP. Ensuring the ETP is continuing to function as expected will prevent any potential impact to the dock should Celsa have the need to utilise the discharge consent. The report is accepted.

Schedule 5 notifications

Schedule 5 notification received on the 26/01/2024 detailing a release of water from the cooling tower. A similar issue occurred on the 26/04/2023, which is detailed in CAR_NRW0043555. A temporary containment measure was put in place following the first release whilst a permanent repair option was being sought. The

second release was a result of the temporary containment measure being removed due to health and safety concerns whilst works were being conducted in the area during a shut-down. Following completion of the works, the temporary containment measure was not re-instated, resulting in a second release from the cooling tower. As with the first release, the water contained a low dose of sodium hypochlorite, which is likely to have minor or minimal environmental impact. Celsa have reported that drainage holes have been installed on the platform to ensure water drains back into the system and a permanent brick bund surrounding the cooling tower is now in place and complete. The maintenance schedule has been updated to include inspection of the bund and drainage holes.

The emission does constitute a breach of the permit, as this is an unauthorised release of sodium hypochlorite which could have a minor environmental impact. The following non-compliance will be issued:

Non-compliance: A category 3 non-compliance is issued for the release of water from the cooling tower containing a chemical dosing agent which could have a minor environmental impact. Permit condition 2.2.7.2

The secondary containment is a welcomed improvement, however, measures to contain leaks from the cooling tower should have been implemented before a release occurred and the temporary measure installed after the first release should have been reinstated following the repair works, which would have contained the second release.

It is a requirement of the permit to ensure all equipment, the failure of which could lead to an adverse impact on the environment should be maintained in good operating condition. Failure to reinstate the temporary containment measures could be seen as a non-compliance with permit condition 2.3.5.

This is seen as a management system failure, whereby employees or staff conducting the works were not adequately trained or aware of the importance of ensuring the temporary containment measure was reinstated following the works. Furthermore, adequate procedures should have been place for checking and signing off the maintenance work following its completion. A single minor non-compliance will be issued against the overarching management condition, which is seen as the root cause of the non-compliance.

Non-compliance: A category 3 non-compliance is issued for the management system for failing to identify and minimise the risk of pollution. Permit condition 1.3.1.

No further actions will be issued as Celsa have implemented permanent containment measures for the cooling tower. However, Celsa should evaluate their procedures and ensure post work checks and sign -off are included for any maintenance work that could have an impact on environmental protection infrastructure.

Site visit

A site visit was held on the 22/04/2024. The purpose of the visit was to familiarise the new site officer with the installation and the activities conducted. The operations and environmental staff provided an overview of the activities and a tour of the facility.

The facility was operational during the visit and metal bar was seen being produced. The process flow was explained, and the different rolling and production lines seen. The facility appeared well maintained and clean throughout. The operations manager has implemented the '5S' principles and the cleanliness of the facility and operational areas was evident. Control room operations were seen, Celsa maintain optimum control of the re-heat furnace ensuring the temperature remains within a set range which is closely monitoring during operations. Regular contact is maintained between all the operations staff and the control room, allowing the most efficient steps to be taken, such as reducing furnace load during stoppages etc. Gas consumption is a key KPI and is closely monitored and daily usage / targets are reviewed regularly which aids in reducing the

environmental impact of the operations.

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.

If your assessment result in Section 1 is suspended, what does this mean?

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 compliance criteria (used in section 1 and 2):

1. Management

- IR1A – General management
- IR1B – Finance (only applicable to Landfill)
- IR1C – Energy efficiency
- IR1D - Efficient use of raw materials
- IR1E - Avoidance, recovery and disposal of wastes produced by the activities
- IR1F - Multiple operator installations

2. Operations

- IR2A – Permitted activities
- IR2B – The site
- IR2C – Operating techniques
- IR2D – Technical requirements
- IR2E – Improvement programme
- IR2F – Pre-operational conditions
- IR2G – Landfill engineering (only applicable to Landfill)
- IR2H – Waste acceptance (only applicable to Landfill)
- IR2I – Leachate levels (only applicable to Landfill)
- IR2J – Closure and aftercare (only applicable to Landfill)
- IR2K – Landfill gas management (only applicable to Landfill)

3. Emission and Monitoring

- IR3A – Emissions to water, air or land
- IR3B – Emissions of substances not controlled by emission limits
- IR3C – Odour
- IR3D – Noise and vibration
- IR3E – Monitoring
- IR3F – Pests
- IR3G – Air quality management plans
- IR3H – Monitoring for the purposes of the Industrial Emissions Directive (this heading includes Large Combustion Plants)
- IR3I – Fire

4. Information

- IR4A – Records
- IR4B – Reporting
- IR4C – Notification

Enforcement response

Any non-compliance with a permit condition 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 twenty 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 to 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.