

Compliance Assessment Report CAR_NRW0046350

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: Report/Data Review,

Reason: Routine.

On: 31/12/2024.

Parts of permit assessed: 4.1.2 / 4.1.3 /4.1.4 / 4.1.5 / .

NRW Lead Officer: Dale Padfield.

Report sent to: -, Environment Manager, on 21/02/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR4B - Installations - Information - Reporting	Assessed (A)	
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	Assessed (A)	
IR1D - Installations - Management - Efficient use of raw materials	Action only (X)	
IR1D - Installations - Management - Efficient use of raw materials	Action only (X)	
IR1D - Installations - Management - Efficient use of raw materials	Action only (X)	

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

Total 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?

Criteria	Action needed	Complete by
IR1D	Action 1: Permit condition 2.4.1.2 requires the operator to undertake periodic water use efficiency audits. Please send a	31/03/2025

Criteria	Action needed	Complete by
	copy of the most recent water efficiency use audit.	
IR1D	Action 2: If no water use efficiency audit has taken place within the last 3 years, NRW requests Celsa undertake a water use efficiency audit and utilise the findings to implement a plan to increase water use efficiency. Please send NRW a review of the audit including any planned actions to increase water use efficiency.	31/07/2025
IR1D	Action 3: If not already captured within the EMS, Celsa should imbed a water use KPI with set annual targets and include these in future reports. Provide NRW with written conformation when a KPI for water use is included within the EMS for the Section Mill.	31/07/2025

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 ~ Sections Mill

EPR/BV0767IT

This compliance assessment report details CAR details the following:

- Annual reporting returns for 2024
- Quarter 3 (July – September) and quarter 4 (October – December) 2024 reporting returns

Annual Returns 2024, A2, EW1, R1, PI1.

Annual reports were received within the reporting window.

A2 -Annual release for NO_x (as NO₂) Oxides of sulphur and particulate matter are detailed. Reductions are seen in all parameters apart from particulate matter.

EW1 – Delivered electricity has decreased when compared to the previous year, with a total decrease of 1884.63 MWh.

R1 – A slight increase in both hazardous and non-hazardous waste generated when compared to the previous year. All waste was sent for recovery with no waste sent for disposal which is an improvement on the previous year.

PI1 – Water supplied per tonne of rolled steel has decreased when compared to the previous years use,

however, it is still above the specific usage reported for previous years, a noticeable increase was recorded in 2019 when compared to 2018, with the 2024 usage being double that recorded for 2018. Although an increase in water use efficiency has been seen in 2024 when compared to 2023.

Oil used per tonne of rolled steel has seen a decrease, with 2024 being the most efficient year recorded. The 2024 figure is less than half that recorded for previous years, this is a commendable effort. NO_x and SO_x per tonne of rolled steel have both decreased and appear to be the lowest recorded since 2018, which continues a trend of decreases mass emissions.

Pc 4.1.4 Fugitive Emissions Review

The principal sources of fugitive emissions remain unchanged. The report states no fugitive emissions during 2024, however, a fugitive emission of potentially contaminated water pumped from a flooded cellar was reported in March 2024, as detailed in CAR_NRW0044457.

The following action was issued in the CAR:

‘Celsa to implement procedures to detail the actions required to safely manage potentially contaminated water from flooded cellars / subsurface infrastructure. The new procedure should be communicated to all relevant operations staff. Please provide NRW with conformation once complete.’ Please provide NRW with confirmation that this has been completed.

Pc 4.1.5 EMS Target Review Report

Gas – Celsa set a target of 429 kWh/tonne in-line with the previous year’s target. A total usage of 469.44 kWh/tonne was reported. Several economic / external factors have resulted in decreased efficiency during 2024. Celsa reported that 14 furnace shut-downs occurred in 2024, resulting in a higher gas usage due to the higher gas demand when re-heating the furnace. This has also increased the degradation of the furnace with the heating cooling cycles resulting in increased cracking and holes within the furnace. Gas consumption remains an important KPI for Celsa and is tracked daily.

Electricity – Celsa’s target of 84 kWh/tonne per month was not met during 2024 with a total of 94.4 kWh /tonne being used. Celsa reported that during the shutdown periods, electricity is still being used for other activities across the site, as such, the higher quantity of shut downs has impacted this KPI.

Oil – A target of 0.6l/tonne of finished product was set, with Celsa recording 0.51l/tonne. Celsa reported that daily meetings to raise awareness of oil consumption and the prompt reporting of issues on a daily basis has improved response times for repair work. Most notably, Celsa now undertake more frequent maintenance, utilising minor stoppages in production to undertake repair work opposed to conducting all repair work during ‘down days’. This is seen as much more proactive approach.

It is noted that Celsa does not include a KPI or annual improvement targets for water usage. Although water will not impact cost to the business as significantly as the items listed above, it does remain an important commodity and its use does have an environmental impact. Water resources are becoming increasingly impacted by climate change, with the UK experiencing more frequent droughts. As such, water usage should be closely monitored to ensure efficient use and should be captured as a KPI within the EMS.

Action 1: Permit condition 2.4.1.2 requires the operator to undertake periodic water use efficiency audits. Please send a copy of the most recent water efficiency use audit. **Due 31/03/2025.**

Action 2: If no water use efficiency audit has taken place within the last 3 years, NRW requests Celsa undertake

a water use efficiency audit and utilise the findings to implement a plan to increase water use efficiency. Please send NRW a review of the audit including any planned actions to increase water use efficiency. **Due 31/07/2025.**

Action 3: If not already captured within the EMS, Celsa should imbed a water use KPI with set annual targets and include these in future reports. Provide NRW with written conformation when a KPI for water use is included within the EMS for the Section Mill. **Due 31/07/2025.**

Quarter 3 and 4 2024 Emissions A1

Each quarterly emissions return was received within the reporting window. All reported emissions are below the relevant ELVs where ELVs apply, for the parameters that do not have an ELV, the emissions are within the expected range.

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.