

Compliance Assessment Report CAR_NRW0046326

Permit being assessed: TP3639BH.

For: Tremorfa Melt Shop, **held by:** Celsa Manufacturing UK Ltd

At: Seawall Road, Tremorfa, Cardiff, South Wales, CF24 5TH.

Type of assessment: Report/Data Review,

Reason: Routine.

On: 31/12/2024.

Parts of permit assessed: 4.2.2 / 4.2.3 / 4.2.6 / 1.1.1 / 2.4 / 3.1 / 3.2 / 3.4 / 4.3.

NRW Lead Officer: Dale Padfield.

Report sent to: -, Environmental 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
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	C3 Minor	3.1.2
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	C3 Minor	3.1.2
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	C3 Minor	3.1.2
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	C3 Minor	3.1.2
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	C3 Minor	3.1.2
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	C3 Minor	3.1.2
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	C3 Minor	3.1.2
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	C3 Minor	3.1.2
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	C3 Minor	3.1.2
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	C3 Minor	3.1.2

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR1A - Installations - Management - General Management	C3 Minor	1.1.1
IR3B - Installations - Emissions and monitoring - Emissions of substances not controlled by emission limits	C3 Minor	3.2.1
IR1A - Installations - Management - General Management	C3 Minor	1.1.1
IR1A - Installations - Management - General Management	C3 Minor	1.1.1
IR3D - Installations - Emissions and monitoring - Noise and vibration	C3 Minor	3.4.1
IR1A - Installations - Management - General Management	C3 Minor	1.1.1
IR4B - Installations - Information - Reporting	Action only (X)	
IR4C - Installations - Information - Notification	Assessed (A)	

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

Total non-compliances recorded	Total non-compliance score
16	64

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
IR3A(1)	Investigate cause of elevated emissions of iron to emission point S2 and implement measures to prevent re-occurrence. Provide NRW with an update on the investigation or details of the mitigation measures being implemented.	30/04/2025
IR3A(1)	Investigate cause of elevated emissions of suspended solids to emission point S2 and implement measures to prevent re-occurrence. Provide NRW with an update on the investigation or details of the mitigation measures being implemented.	30/04/2025
IR3A(1)	Investigate cause of elevated emissions of iron to emission point S1 and implement measures to prevent re-occurrence. Provide NRW with an update on the investigation or details of the mitigation measures being implemented.	30/04/2025
IR3A(1)	Investigate cause of elevated emissions of iron to emission point S1 and implement measures to prevent re-occurrence. Provide NRW with an update on the investigation or details of the mitigation measures being implemented.	30/04/2025
IR3A(1)	Investigate cause of elevated emissions of arsenic to	30/04/2025

Criteria	Action needed	Complete by
	emission point S1 and implement measures to prevent re-occurrence. Provide NRW with an update on the investigation or details of the mitigation measures being implemented.	
IR3A(1)	Investigate cause of elevated emissions of suspended solids to emission point S1 and implement measures to prevent re-occurrence. Provide NRW with an update on the investigation or details of the mitigation measures being implemented.	30/04/2025
IR3A(1)	Investigate cause of elevated emissions of suspended solids to emission point S1 and implement measures to prevent re-occurrence. Provide NRW with an update on the investigation or details of the mitigation measures being implemented.	30/04/2025
IR3A(1)	Investigate cause of elevated emissions of HOI to emission point S1 and implement measures to prevent re-occurrence. Provide NRW with an update on the investigation or details of the mitigation measures being implemented.	30/04/2025
IR3A(1)	Investigate cause of elevated emissions of HOI to emission point S1 and implement measures to prevent re-occurrence. Provide NRW with an update on the investigation or details of the mitigation measures being implemented.	30/04/2025
IR3A(2)	Return to compliance with daily average particulate ELV.	Already completed
IR1A	Identify cause of elevated particulate emissions and implement corrective measures.	Already completed
IR3B	Ensure fugitive emissions of dust are controlled and compliant with permit.	Already completed
IR1A	Identify root cause of fugitive dust emissions and implement mitigation measures to prevent a re-occurrence.	Already completed
IR1A	Identify root cause of elevated PCDD/F emissions and implement measures to prevent a reoccurrence.	Already completed
IR3D	Implement measures to prevent off-site impact of noise from the defective chain conveyor.	Already completed
IR1A	Ensure the noise management plan includes procedures to identify and escalate reports of noise, particularly from defective plant and equipment. Provide NRW with confirmation the EMS has been reviewed and updated.	30/04/2025
IR4B	Please Submit ambient monitoring data from the monitors installed as per improvement condition 9.	31/03/2025

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.

You are non-compliant with your permit.

We are currently considering taking enforcement action against you for the non-compliance recorded above. We will contact you in due course.

4. Details of our assessment

Celsa Manufacturing (UK) Limited

EPR/TP3639BH

Compliance assessment report (CAR) detailing the following topics:

- Quarter 3 (July ~ September) 2024 permit reporting returns
- Quarter 4 (October ~ December) 2024 permit reporting returns
- Six monthly / annual returns for emissions to air, water & sewer
- Schedule 5 notifications
- Reports & complaints
- Improvement condition updates
- Response to actions from CAR_NRW0045391
- Confirmation of correct sampling point for emission point S5
- Review of annual performance reporting metrics as required by permit condition 4.2.2
- Site updates and other developments

Quarter 3 (July ~ September) 2024 permit reporting returns

Air emissions ~ A1 / A5 / Ambient monitoring

A1 ~ Maximum daily average particulate emissions for July, August and September were reported at 5.06, 3.75 and 5.4 respectively. Further discussion on the apparent exceedances can be seen below under the 'Schedule 5' section. The reports are accepted.

A4 ~ Maximum value reported as <1 (Ringelmann shade) for each month of the quarter. The reports are accepted.

A5 ~ A total of 498.3 hourly averages were recorded during the quarter, with 2 hourly averages exceeding the trigger level. The report is accepted.

Ambient monitoring ~ Ambient monitoring reports received, no reported data gaps indicate the new ambient monitors are performing more reliably than the old monitors. Reports/data accepted.

Waste returns

Waste returns were reported on time, all received EWC codes are compliant with the permit. The returns are accepted.

Quarter 4 (October ~ December) 2024 permit reporting returns

Air emissions ~ A1 / A2/ A4 / A5 / A11/ Ambient monitoring

A1 ~ All parameters reported to be within their respective ELVs. The reports are accepted.

A2 ~ Particulates reported at 0.98 mg/Nm³ against an ELV of 10 mg/ Nm³. The report is accepted.

A5 ~ A total of 434.57 hourly averages were recorded during the quarter, with 15 hourly averages exceeding the trigger level. The report is accepted. The operator should investigate any trend of increasing hourly average exceedances to ensure the continued suitability of any preventative maintenance schedule or procedures. All parameters within respective ELV's for the annual extractive monitoring. The report is accepted.

A4 ~ Particulate matter reported below ELV. Reports accepted.

A11 ~ Monitoring results reported at 1.14 mg/Nm³ against an ELV of 5 mg/ Nm³. The report is accepted.

Ambient monitoring ~ Ambient monitoring reports received for the monitors stationed at both the Willows and Baden Powell schools.

Please note that for the purpose of the permit reporting, the data from the on-site monitors as confirmed by improvement condition 9 also needs to be reported on a quarterly basis. An action will be issued for this data to be submitted by 31/03/2024.

Emissions to water ~ discharge soakaway

Report received, no ELVs for any parameters measured at the 'soakaway'. Report accepted.

Emissions to sewer ~ S1 & S2

S1 ~ Various ELV exceedances have been recorded during Q3 & Q4, further detail, including non-compliance scoring can be found below in the schedule 5 section.

S2 – Exceedances recorded for iron ~ 13.3 mg/l against an ELV of 5 mg/l, and suspended solids ~ 150 mg/l against an ELV of 20 mg/l. All other parameters reported within their respective ELVs. Two subsequent schedule 5 notifications were received following discovery of the exceedances which had not been identified following the sampling in June 2024. Celsa have stated that the exceedances are being investigated along with the exceedances at the S1 discharge point. The root cause is still under investigation and will be detailed in follow up compliance reports. The following non-compliances will be issued for the exceedances.

Non-compliance: A total of 2 category 3 minor non-compliances are issued for exceeding the

various ELVs to sewer at discharge point S2. Permit Condition 3.1.2.

Waste returns

Waste returns were reported on time, all received EWC codes are compliant with the permit. The returns are accepted.

Schedule 5 Notifications

Several schedule 5 notifications detailing exceedances of various ELVs to the S1 discharge point have been received during Q3 and Q4, a summary is provided in the table below.

Date of breach	Parameter	Emission point	ELV ~ mg/l	Concentration ~ mg/l
04/09/2024	Iron	S1	5	5.68
04/11/2024				6.61
02/12/2024				7.01
04/09/2024	Arsenic		0.01	0.0118
01/07/2024	Suspended Solids		20	112
05/08/2024				128
04/11/2024				59
02/12/2024				76
01/07/2024	Hydrocarbon oil		5	8.27
05/08/2024				13
04/11/2024		14.9		

As per NRW non-compliance scoring rules, multiple exceedances of the same parameter within the same quarter will be consolidated into a single non-compliance score for that quarter. However, different parameters are scored separately. As with previous exceedances of this nature, the elevated emissions are regarded as having minor or minimal environmental impact, given the discharge is to the foul sewer line and so additional treatment is likely to take place. Therefore the following minor non-compliance scores will be issued:

Non-compliance: A total of 7 category 3 minor non-compliances are issued for exceeding the various ELVs to sewer at discharge point S1. Permit Condition 3.1.2.

Celsa had sought the expertise of an outside specialist to help identify the cause of the exceedances. This had been primarily attributed to the use of dispersant chemicals which had inadvertently disrupted the filtration and settlement process within the ETP. Furthermore, un-optimised filtration processes were believed to be contributing along with limited routine maintenance and monitoring.

Improvements and solutions to the above were implemented, including ceasing the use of the dispersant chemical, optimising the chemical dosing and further collaboration with an expert to assess the effectiveness of current processes. Following the implementation of these, Celsa was confident that the issue was under control, however, further ELV exceedances have been recorded

since implementation, including some ELV exceedances noted in January 2025. As such, root-cause scoring will be withheld until Celsa can provide further clarity on the matter. An action will be issued to provide NRW with further updates.

Several schedule 5 notifications detailing exceedance of the daily average ELV for particulates on the A1 main stack have been received, a summary is provided in the table below.

Date of breach	Parameter	Emission point	ELV mg/Nm3 ~	Concentration ~ mg/Nm3
12/07/2024	Particulate matter (Daily average)	A1	5	5.1
21/09/2024				5.25
24/09/2024				5.4
07/10/2024				5.3
12/10/2024				5
15/10/2024				5.53

As discussed in the 'previous actions' section below, the exceedances in the table are deemed to fall within the uncertainty of the analyser (accepted as 1.02mg/Nm3) and therefore no non-compliance scoring will be issued. However, a daily average of 7.1mg/Nm3 was recorded on 31/05/2024 and this was not detailed on the Q2 CAR form. The result did not appear on the returns reporting form, however a Schedule 5 notification was raised for the exceedance. The exceedance is above the ELV with the uncertainty applied, therefore the non-compliance score will be issued here. The exceedance is likely to only have minor or minimal impact due to it occurring over a short term and only marginally above the ELV, the following non-compliance will be issued.

Non-compliance: A category 3 minor non-compliance is issued for exceeding the daily average particulate matter ELV on the A1 stack. Permit condition 3.1.2.

As with any non-compliance, we will assess and score the root cause on its own merits. Celsa indicated in their schedule 5 Part 'B' received on 15/11/2024 that the cause of the elevated particulate levels was due to damaged bags within the bag-house going undetected due to a lapse in the maintenance schedule. This in turn was a result of a contractor change which resulted in a change of the bag-house inspection procedures which did not provide adequate checks. From the elevated results record, it would appear this maintenance lapse was on-going between July and November, however this only resulted in several occasions where the daily average particulate levels were reported above the ELV.

Celsa have since put procedures in place and re-trained contractors to ensure adequate checks and maintenance are upheld on the bag-house, allowing early detection and repair of damaged filtration bags, and ensuring compliance with the daily particulate ELV is maintained.

This is seen as a management system failure, primarily a procedural failure of the 'management of change' (MOC). An effective MOC procedure should be in place to evaluate how any proposed changes may impact environmental compliance/operations etc. A MOC procedure allows a

systematic approach to be taken to assess, document and implement changes, ensuring risks are controlled or mitigated and compliance is maintained. Non-compliance scores are based on potential impact, as a maintenance schedule was still in place during this period the exceedances are unlikely to have been more significant than what had occurred. As such, the following minor non-compliance will be issued for the management system failure.

Non-compliance: A category 3 minor non-compliance is issued for the management system failure which resulted in an ELV exceedance. Permit condition 1.1.1.

Celsa has since introduced a comprehensive maintenance schedule, more detailed inspection protocols and undertaken contractor re-training. No further actions will be issued however, Celsa is advised to review any associated MOC procedures to ensure such changes are captured and effectively managed.

A schedule 5 notification detailing dust beyond the boundary was received on 19/09/2024. The report stated that a neighbouring business along Tide-fields Road had reported a dust nuisance originating from the Celsa 'Minerals Site' on 17/09/24 – 19/09/24. Weather data indicates that the wind direction on 17/09/24 was E /NE which coincides with the possibility of dust being blown from the Minerals site in the direction of Tide-fields Road. This is seen as a fugitive emission, the following minor non-compliance will be issued.

Non-compliance: A category 3 minor non-compliance is issued for the fugitive emission of dust beyond the site boundary. Permit condition 3.2.1. This is because it was a Short term, localised effect on air quality arising from transient visible impact which did not contribute to exceedance(s) of National Air Quality standards.

The part 'B' of the notification highlighted several areas of improvement, including, additional dust suppression systems in the form of additional water cannons for specific slag storage bays. The new ambient dust monitors are being used to provide information regarding particulate spikes, to help inform further mitigation measures. Beyond this, Celsa are investigating borax additive trials, which aims help the slag form clumps, reducing loose particles and therefore reducing the likelihood of dust forming from the material. The root cause is seen as a management system failure, primarily a procedural failure whereby the dust management plan failed to prevent dust migrating beyond the site boundary.

This is considered a minor non-compliance because dust management strategies are already employed at the facility, suggesting that the potential impact of this failure could only result in a minor fugitive emission. The following non-compliance will be issued.

Non-compliance: A category 3 minor non-compliance is issued for the management plan failing to prevent fugitive emission of dust beyond the site boundary. Permit condition 1.1.1.

No further actions will be issued as the measures taken appear to have been effective, with no further reports being received. Celsa are advised to ensure the dust management plan continues to remain effective with appropriately scheduled reviews.

PCDD/F exceedance root cause

Celsa's initial investigation concluded that the elevated PCDD/F result was due to a dosing failure on the activated carbon dosing unit. However, further investigation by Celsa found that the activated carbon injection had maintained a dosing rate of 20-30 kg/hour, which is the set rate for the plant, this was observed by NRW during an inspection earlier in the year.

Celsa had identified, as with previous exceedances of the same nature, a significant build-up of material within the quench tower. As discussed, this is likely to increase PCDD/F concentrations via two routes: inefficient quenching of gas temperature, leading to re-formation of PCDD/F and possible memory effect resulting in PCDD/F being released into the gas stream from the deposited material. As such, the root cause is seen as a management system failure, whereby process control has been inadequate in preventing an ELV exceedance i.e., the maintenance procedure for ensuring material build-up within the quench tower is ineffective in preventing excessive build-up of material in the quench tower which resulted in a PCDD/F ELV exceedances. As with previous exceedances of this nature, and in-line with the scoring previously issued, the following minor non-compliance will be issued.

Non-compliance: A category 3 minor non-compliance is issued for the management system failure which resulted in an ELV exceedance.

PCDD/F proposed investigation

Celsa has approached NRW for support in undertaking a trial to validate the 'quench tower material build-up hypothesis and confirm if the quench tower condition does result in / impact on PCDD/F concentration within the gas stream. Celsa has suggested undertaking two PCDD/F samples, one before and one following a quench tower clean, to evaluate what impact the deposits material has on the quench tower effectiveness and the PCDD/F concentrations.

As discussed during the site meeting, NRW fully supports Celsa in undertaking further investigative work and would encourage such work to be undertaken. A few points to consider:

- As discussed during the site meeting, Celsa should avoid allowing an excessive build-up of deposits within the quench tower which are likely to lead to an ELV exceedance, Celsa should aim to remain compliant with the ELV at all times. If an ELV is exceeded, it will still be considered a permit breach and will be scored as such.
- Celsa may want to consider alternative methodologies for testing their hypothesis. The current method detailed by Celsa (1 test pre-clean and one test post-clean) may provide some indication that the cleanliness of the quench tower does impact the PCDD/F concentration. However, it is well established that the 'memory effect' and temperature (rate of cooling etc) can play significant roles in PCDD/F concentrations within flue gas. Celsa may

find it more beneficial to conduct a series of PCDD/F tests at set intervals following a quench tower clean. This in turn may help inform an appropriate cleaning/maintenance regime i.e., provide an indication as to when the material deposits begin negatively impacting the PCDD/F concentration / quench tower efficiency.

- Celsa may also want to consider other areas that may influence the PCDD/F concentration, such as the input materials (are there particular waste streams entering the furnace that may be problematic for PCDD/F formation? I.e., waste streams that are higher in 'contaminants'. The impact of the post-combustion chamber is another area that could also be considered as having a potential influence on the PCDD/F formation.

We are pleased to see Celsa exploring this issue further and look forward to seeing this initiative progressed. Please keep NRW informed with any developments.

Complaints and reports

Several reports of excessive noise were received by NRW during October, the following incident reports were received:

WIRS reference numbers:

11/10/2024: 2413370

29/10/2024: 2413940, 2413942, 2413949, 2413956, 2413946, 2413953.

For the report received on 11/10/2024, officers attended the Splott area (location of the report) on 14/10/2024 but were unable to substantiate any excessive noise from the Celsa installation at that time. However, the wind direction was not favourable to assess any noise from Celsa at this location and traffic noise was the dominant at the time (midday). However, officers were able to substantiate a loud screeching noise when walking along Seawall Rd, the sound appeared to be emanating from the de-dusting plant area.

For the reports received on 29/10/2024, an NRW officer substantiated excessive noise originating from the Celsa installation between 17:00 and 18:00 on 29/10/2024. Although the noise was likely prolonged and offence in nature, potentially meeting the significant non-compliance category, the operator acted quickly utilising appropriate measures to mitigate the impact once the severity of the off-site impact was realised. As such, the following minor non-compliance will be issued for excessive noise resulting in offsite disturbance.

Non-compliance: A category 3 minor non-compliance is issued for excessive noise resulting in pollution beyond the site boundary. Permit condition 3.4.1.

Celsa identified an issue with the screw conveyor on the bag-house for the de-dusting plant. The condition of the conveyor had deteriorated resulting in metal rubbing on metal, which was producing

a loud screeching noise. Celsa had been aware of the issue prior to NRW requesting Celsa investigate the reported noise issues. Celsa reported that attempts had been made to reduce the noise by reducing the speed of the conveyor, however, this had been problematic to the de-dusting system and was ineffective at reducing the noise. Celsa had received internal reports from operators, as per the noise management plan, but had not realised the severity of the off-site noise impact of the faulty conveyor. The root cause is seen as a management system failure, whereby procedures were ineffective in preventing the excessive noise from occurring, i.e., early identification of plant failure and failure to implement mitigation measures before an offsite impact occurred. The following minor non-compliance will be issued.

Non-compliance: A category 3 minor non-compliance is issued against the management system for failing to prevent excessive noise beyond the site boundary which negatively impacted the local community. Permit condition 1.1.1.

Since the escalation of the issue, Celsa implemented immediate temporary measures – including the erection of acoustic barriers around the faulty conveyor. This has significantly reduced the noise levels emanating from the conveyor and any offsite impact. A full replacement of the conveyor has been scheduled for 2025. Additionally, Celsa has re-issued training to scrap handling operatives, ensuring noise is adequately managed during operations. Several of the reporters provided positive feedback, stating there had been a noticeable decrease in both the high-pitched screeching and ‘metal crashing’ noises.

Celsa has re-instated community liaison meetings, NRW is pleased to see Celsa reaching out to the local community as this provides an excellent opportunity for the community to raise any concerns with the operator directly and can help build a relationship and rapport with the local community.

Further reports of excessive noise on multiple occasions during February 2025 have been brought to NRW's attention, these will be investigated and detailed in a separate CAR.

Improvement condition updates

The confirmation of the installation and location of the ambient dust monitors was provided by Celsa on 30/10/2024. Celsa has confirmed that two monitors have been installed at the following locations:

MS Weighbridge, Cardiff - TNT1937

GPS: 51.47812,-3.13638

W3W – ruled, unrealistic.spray

MS Substation, Cardiff - TNT1938

GPS: 51.48129,-3.13041

W3W – this.claims.table

Improvement condition 9 is considered complete.

Celsa has requested an extension for IC10, to allow time to establish routine steady operations on the shredder before conducting the noise survey. An extension to the 31/03/2025 has been granted.

S5 sampling point

Celsa has made NRW aware that the location of the S5 sampling point is in a different location than that stated within the permit. The error occurred due to the relocation of some of the connection drainage (connecting the collection drainage to the foul sewer) after the original plan was submitted as part of the variation application for the new shredder. Services were encountered within the initial proposed connection location and therefore the drainage and subsequent sampling point were positioned slightly further South than originally planned. This error doesn't appear to have any impact on the sampling, other than the assumed location (although not precise on the permit) is slightly incorrect.

Review of annual performance reporting metrics as required by permit condition 4.2.2.

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Production

Production tonnage has remained relatively consistent with the previous two years, with approximately 800,000 tonnes of steel produced. A slight decrease in tonnage was seen when compared to 2023.

Energy usage

Specific usage for electricity (measured in MWh/t) have remained relatively consistent since 2019, with occasional fluctuations seen year on year. Celsa reported a decrease of 5% (MWh/t) during 2024 for electricity, however the specific consumption appears slightly increased on the 2019 figure. Overall however, there is no trend to suggest a decline in electricity usage performance, with the 2024 kWh / tonne of liquid steel being comparable to previous years.

Specific usage for gas (MWh/t) shows an increase (6%) in 2024 when compared to 2023, however, both 2023 and 2024 are significantly below previous years, where usage was double that now being recorded.

Celsa reported that optimisation of electrical and oxy patterns and optimisation of furnace scrap blends have improved overall electricity consumption performance of the furnace.

Celsa are continuing to make efforts to reach their 'Net Zero by 2030' target.

A1 Metlshop Air Emissions

Particulate matter per tonne of steel appears to have slightly increased on 2023 figures, but would appear within average when evaluated with previous year's figures. NOx and SOx remaining relatively stable with the previous 2 years. It is noted that the NOx and SOx figures are based on a single annual spot sample and so the data is only indicative.

S1 Wastewater Quality

Emission to the S1 discharge point have seen a significant decline in quality with frequent exceedances of ELV record in the second half of 2024. Celsa reported that investigation into the cause are ongoing. This will be discussed during the next compliance visit.

Water Consumption

Water consumption has shown a decreasing trend year on year since 2019, with a slight increase observed in 2022, however the overall trend appears to be improving. Specific usage (m³/tonne) for 2024 was 0.47 m³/tonne, a decrease of 0.11 m³/tonne on 2023 figures, this is a significant improvement and is commendable.

Waste Production

Both hazardous and non-hazardous waste has remained relatively consistent since 2021. Permit condition 1.4.2 requires the operator to undertake a review at least every four years to ensure the measures being implemented are the most appropriate. Celsa are requested to undertake a review to assess if there are any opportunities to reduce waste.

Action 1: undertake a review in-line with permit condition 1.4.2, with the primary objective of assessing any opportunities to reduce the quantity of waste arising at the facility. Due 31/07/2025

Fugitive emissions

Celsa have reported continued improvements to the Meltshop roof, minimising the maintenance burden through use of higher quality materials and improving overall efficiency of the building in preventing the escape of process fumes.

Celsa have revised the maintenance schedule for the de-dusting plant, probes have been installed within each cabinet to help detect early failure / issues. Real – time monitoring of the flushing system within the bag-house is used to continuously track dust levels across cabinets, further helping reduce elevated releases to the environment.

Response to actions from CAR NRW0045391

A concise response was received on 06/12/2024, a summary of each response is provided below.

IR3E – Although the particulate CEMS model is MCERTS certified, the age of the CEM has resulted in no uncertainty figure being published on the CEMS certificate, and the CEM has since been superseded by newer models. Celas’s air consultant has provided a detailed response and used the uncertainty figure quoted by the new model. As stated by the consultant, this is likely as close as we will get to the uncertainty of the current model in use. As such, we will accept the uncertainty value of 1.02 mg/Nm³. Being able to provide an accurate uncertainty measurement is important for ensuring the reported data is reliable. Furthermore, it has implications for non-compliance scoring, particularly when the daily averages are reported at higher values above the ELV. Action complete.

IR3A (PCDD/F abatement issues) – The information is detailed in the PCDD/F exceedance section above. Action complete but investigative work on-going.

IR3A (S1 ELV exceedances) – The information has been captured in the schedule 5 S1 ELV exceedance section above. As detailed, the apparent issue had been identified, however, ELV exceedances have occurred following implementation of the corrective actions. This may be ‘teething’ issues with the corrective action or further issues which have yet to be identified. Further updates will be captured once the investigation is complete.

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.