

## Compliance Assessment Report CAR\_NRW0046401

**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:** Report/Data Review,

**Reason:** Routine.

**On:** 31/12/2024.

**Parts of permit assessed:** 4.1.2, 4.1.4, 4.1.5, .

**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
IR4B - Installations - Information - Reporting	Assessed (A)	
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	Assessed (A)	
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	Assessed (A)	

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?

No action required.

### 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 ~ Road and Bar Mill

EPR/ BV0759IC

This compliance assessment report details the following:

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

**Quarter 3 and Quarter 4 2024 returns**

All reports received within the reporting window.

**W1 reporting form**

**July** – All parameters within respective ELVs with the exception of total hydrocarbon oil – 7.26 mg/l against an ELV of 5.0 mg/l.

**August** – All parameters within respective ELVs with the exception of total hydrocarbon oil – 11 mg/l against an ELV of 5.0 mg/l and suspended solids 233 mg/l against an ELV of 80 mg/l.

**September** - All parameters within respective ELVs with the exception of total hydrocarbon oil – 29.4 mg/l against an ELV of 5.0 mg/l and suspended solids 178 mg/l against an ELV of 80 mg/l.

**October** - All parameters within respective ELVs with the exception of free chlorine – 0.31 mg/l against an ELV of 0.1 Mg/l.

**November** - All parameters within respective ELVs with the exception of total hydrocarbon oil – 23.9 mg/l against an ELV of 5.0 mg/l.

**December** - All parameters within respective ELVs with the exception of total hydrocarbon oil – 8.4 mg/l against an ELV of 5.0 mg/l, suspended solids 188 mg/l against and ELV of 80 mg/l and free chlorine – 0.19 against an ELV of 0.1

It is noted that no releases were made to the dock, with all water being recirculated, and as such, no non-compliance scores will be issued. However, there has been a noticeable decline in the quality of the water post-treatment, with significantly elevated concentrations of oil. Celsa should investigate the cause of the apparent decline in treatment efficiency.

The quarterly reports for emissions to air from emission point A1 indicate that the NO<sub>x</sub> emissions were below the ELV during the monitoring for both quarters.

The reports are accepted.

**Annual reporting 2024****Reporting forms A2, EW1, R1 & PI1**

**A2** – A total of 58,220.43 kg of NO<sub>x</sub> (As NO<sub>2</sub>) was estimated to be emitted, an increase of 8,668 kg from the previous year.

**EW1** – Totals for Electricity, natural gas, process water and CO<sub>2</sub> are reported.

**R1** – The proportions of waste remain relatively consistent with previous years. All wastes continue to be sent for recovery with no waste being sent to landfill.

**PI1** - Water supplied per tonne of rolled steel has seen a slight decrease on the 2023 figure, however, remains above the values reported for 2022 and 2020. The water usage data does not appear to follow any trend, with large variations in the values year on year.

Oil usage per tonne of rolled steel has increased on the previous year, with the reported value being the highest during the past six years.

NO<sub>x</sub> production per tonne of rolled steel has also increased on the previous year and appears to be the highest recorded during the past six years.

**Pc 4.1.5 EMS Annual Improvement Targets**

The rod and Bar Mill had a gas usage target set at 351.2 kWh/tonne per month for 2024. Celsa did not meet the target with usage reported at 396.43 kWh/tonne being reported. Celsa reported an increase in colder billets (up to 60°C colder) being received at the rod and bar mill resulting in higher gas consumption. Further to this, increases in minor stops have also contributed to higher usage. Gas consumption is a closely monitored KPI at the mill and is tracked on a daily basis.

The electricity consumption target of 100.24 kWh/tonne was not met for 2024, with a figure of 109.52 kWh/tonne reported. The mill has had lower utilisation during 2024 due to issues with billet supply from the Meltshop. Similar to gas, electricity is a KPI closely monitored.

The oil consumption KPI was not achieved, with the site consuming 0.56l/tonne against a target of 0.45 l/tonne. The site continues to face challenges meeting this KPI due to the age of the equipment and difficulty in leak detection. Proactive maintenance continues to be undertaken to prevent and detect leakages as early as possible. Oil consumption is tracked daily at the mill.

**Pc 4.1.4 Fugitive Emissions annual review.**

Principle sources of fugitive emissions remain unchanged, these are the roof vents and the water treatment system. Additionally, on-site oil and chemical storage have the potential for releases. Celsa have reported no fugitive emissions to air from the site for 2024. There have been no changes to refractory de-scaling works.

One schedule 5 notification was submitted during 2024, the details of which are captured in CAR\_NRW0044456.

Several reports of oil within the East Bute Dock were received by NRW during 2024, which were alleged to have originated from Celsa rod and bar mill. The oil reports were substantiated, however, NRW were not able to determine the source of the oil. The oil was seen to be intermittently bubbling to the surface in the

southeast corner of the dock, this appears to be a re-occurring issue at this location. A sample was obtained, with the aim of providing qualitative data such as an oil ID . However, the results were inconclusive, likely due to the relatively small quantities of oil. As discussed, this topic will form part of the compliance work for 2025.

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](mailto: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](mailto: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.