

Compliance Assessment Report CAR_NRW0048384

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: Audit,

Reason: Incident Response (Incident number 2501394).

On: 23/05/2025.

Parts of permit assessed: 2.9. 2.10.2.

NRW Lead Officer: Dale Padfield.

Report sent to: -, Environmental Manager, on 23/05/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR1A - Installations - Management - General Management	C3 Minor	2.9.1
IR3D - Installations - Emissions and monitoring - Noise and vibration	Action only (X)	
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	Assessed (A)	

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

Total non-compliances recorded	Total non-compliance score
1	4

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
IR1A	Develop and implement a written noise management plan. (Action complete - Copy of noise management plan ECP74 received).	Already completed
IR3D	Explore and assess any feasible options for reducing noise on the Section Mill billet bank East entrance rail track. Once	31/07/2025

Criteria	Action needed	Complete by
	complete, please report your findings to NRW.	

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 (7 STEEL MANUFACTURING (UK) LIMITED)

EPR/BV0767IT

This compliance assessment report (CAR) details the following:

- Quarter 1 (January – March) 2025 returns
- Update regarding noise management

Quarter 1 (January – March) 2025 returns

The monitoring returns, as required by permit condition 2.2.1.3 were received within the reporting window and reported all parameters to be within their respective emission limits, the returns are accepted.

Update regarding noise management

NRW received several reports of excessive noise alleged to be originating from the Celsa (7Steel) installation during January and February 2025. Following an initial investigation concentrating on the Meltshop site, NRW requested the operator broaden the investigation to the Sections Mill.

A detailed report was provided highlighting from the Sections Mill providing an overview of the operations during the period 26/01/2025 – 17/02/2025. During this period, no abnormal operations took place, with the site following the usual pattern of production & maintenance. The report detailed the starting of re-processing works (re-processing bundles through re-boxing, cut backs & straightening, and scraping bars that don't meet specific quality standards. Of these re-processing operations, it was reported that straightening is the only activity capable of producing noise that can be heard externally to the warehouse. However, these operations did not commence until the 13th of February, some two weeks after the initial noise reports were received.

Rail movements were explored as a potential source. The rail movements do not operate to a set

schedule, but all movements are logged. Some deficiencies were identified within the record keeping for rail movements, with the cause identified as a recent change in rail operations manager and new rail operating personnel (lack of experience and knowledge). The deficiencies were flagged with improvements scheduled.

There were no significant change in rail operations or movements over the reported period. New locomotives are being phased in, however this change is unlikely to have resulted in any change in overall noise levels.

One potential area of noise was highlighted. A section of the railway track curves around a bend, this section of track leads to the 'Section Mill Billet Bank East Entrance'. It is reported that this section of track is particularly noisy, which is suspected to be a result of the curved nature of the track. This is usually a result of friction induced unstable vibration of a railway wheel which can cause a squeal type noise on sharp bends or curved sections of railway track. Rail movements were identified to be occurring on this section of the track during one of the reported times, suggesting this may be a potential source or contributing factor to off-site noise nuisance.

Friction management is a possible solution to reducing noise of the curved section of track. Some evidence suggest lubrication using either grease or water sprays have proven successful in controlling squeal noise. It should be noted that friction levels on the wheel and rail running surfaces needs to be considered, and care taken not adversely affect this aspect, leading to a loss of adhesion which could compromise safety. Some literature suggests that grease is only applied to the rail gauge corner or wheel flange. Friction modifiers are also reported to have been used successfully, effectively eliminating squeal without adversely affecting the level of friction.

Action 1: Celsa (7Steel UK Limited) to explore and assess any feasible options for reducing noise on the Section Mill billet bank East entrance rail track. Once complete, please report your findings to NRW. **Due 31st July 2025.**

The Section mill report concluded that over the period that noise was initially reported, operations at the Mill were as normal with no excessive noise identified by shift managers or operatives.

It was discovered, however, that there was no written noise management plan in place for the Sections Mill site. As such, there were no formal procedures in place to ensure noise from the operations are limited to as far as practicable via appropriate control measures. The permit requires the operator to use BAT to reduce noise and vibrations from the installation. As a minimum requirement to meet BAT, it would be expected that the operator has a written NMP, identifying potential noise sources and applying appropriate control measures. As such the following minor non-compliance will be issued.

Non-compliance: A category 3 minor non-compliance is issued for the operator failing to meet BAT through the absence of a written noise management plan for the Sections Mill site. Permit Condition 2.9.1.

Since discovery, the operator promptly implemented a formal written NMP and provided NRW with a copy – ECP74. No further action required. Noise management will form part of the ongoing compliance agenda.

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.