

7th May 2020

Mr. Richard Taylor
Pollution Prevention and Control Team
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St Mellons Business Park
St Mellons
CARDIFF
CF3 0EY

Our Ref: W:\Environmental\IPPC\Permit TP3639BH\Improvement Programme\NMS Improvement Programme\IC4 – FPMP's\Response To Environmental Permit Improvement Condition IC4.doc

Dear Richard,

RE: Tremorfa Melt Shop EPR Permit TP3639BH Improvement Programme IC4

In accordance with the Tremorfa Melt Shop Environmental Permitting (EPR) Permit TP3639BH, please find below our formal response to the Improvement Programme Reference IC4, as specified in table S1.3 '*Improvement Programme Requirements*'.

Introduction

The company is required to satisfy the improvement programme conditions as stated in Table S1.3 of EPR Permit TP3639BH. This report is intended to satisfy improvement condition reference IC4:

IC4 The operator shall submit a written Fire prevention and mitigation plan (for the activities A2, A4, A10, A12) to Natural Resources Wales.

The Fire prevention and mitigation plan must be produced in line with the standards set out in Fire prevention and mitigation plan guidance – Waste.

1.0 Activities and associated FPMP procedure

New Environmental Control Procedures (ECP) have been written and introduced into the CELSA (ISO14001:2015 certified) environmental management system, copies enclosed within. A summary of the procedures and associated permitted activities can be seen in the table below:

Please see overleaf

EMS Procedure Ref	Procedure Title	Permit Activities Included
ECP54	Cardiff Scrap Yard Fire Prevention & Mitigation Plan	<p>Activity A12 – Metal recycling site (mixed MRS) including end of life vehicle de-pollution, including</p> <ul style="list-style-type: none"> • R13: Storage of waste before treatment on site (excludes temporary storage of waste produced on site before it is collected) • R3: Recycling/reclamation of organic substances which are not used as solvents • R4: Recycling/reclamation of metals and metal compounds • R5: Recycling/reclamation of other inorganic compounds
ECP55	Fire Prevention & Mitigation Plan: A2 Activities	<p>A2 Activities: Slag collection and transfer from installation to waste operation; Cooling and breaking of hot metal residues by drop balling and oxygen lancing prior to return to the electric arc furnace.</p> <ul style="list-style-type: none"> • R4: Recycling/reclamation of metals and metal compounds • R13: Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced) <p>A10 Activities: Waste transfer station with treatment</p> <ul style="list-style-type: none"> • R13: Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced) • R3: Recycling/ reclamation of organic substances which are not used as solvents • R4: Recycling/ reclamation of metals and metal compounds • R5: Recycling/ reclamation of other inorganic compounds
ECP56	Cardiff Scrap Handling Fire Prevention & Mitigation Plan	<p>Activity A4 – Scrap Handling and Storage, including: Scrap unloading, sorting and storage. Loading into baskets and transfer to the furnaces.</p> <ul style="list-style-type: none"> • R13: Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced) • R4: Recycling / reclamation of metals and metal compounds

Table 1: CELSA FPMP Procedures and associated permitted activities

2.0 Summary

CELSA considers that with the above procedures in place, which align with the expectations laid down in Fire Prevention & Mitigation Plan Guidance – Waste Management: Guidance Note 16 – Revision 2, the requirements of IC4 have been satisfactorily met.

If you require any further information or should have any further questions, please do not hesitate to contact me.

Yours sincerely,



Environmental Manager