

29th November 2019

Dr Gareth Richards
Pollution and Prevention Control Team
Natural Resources Wales
Rivers House
St Mellons Business Park
St Mellons
CARDIFF
CF3 0EY

Dear Gareth,

RE: Tremorfa Melt Shop Compliance Assessment Report (CAR) following the Schedule 5 dated 12th July 2019.

In accordance with CAR_NRW0035625, please find below our management control plan for the storage of scrap steel cans on site. The aim of the plan is to prevent cans from acting as a breeding site for flies and to ensure no environmental impacts are seen off site.

1.0 Introduction

CELSA Manufacturing UK Ltd is regulated under section 12 of the Environmental Permitting Regulations 2010 (as amended) to operate an installation which carries out activities as defined within section 2.1 A(1)(b) *'Producing, melting or refining iron or steel or any ferrous alloy, including continuous casting'*. As such the company is permitted in accordance to the terms and conditions of EPR Permit TP3639BH.

The CAR form requested the following actions:

"Celsa must prepare a management plan specifically for the storage of scrap steel cans that are always likely to arrive on site with some contamination that makes them attractive to flies. The plan should include procedures that ensure the scrap steel inventory is minimised during the normal breeding months (April to September) and that active control measures are used to ensure the inventory does not support breeding flies. A copy of the plan is to be provided to NRW by 30th November 2019."

In response to this action, please see the response in section 2.0 below.

2.0 Scrap Management Plan

The scrap management plan detailed below looks at how CELSA source, store, treat and manage scrap steel cans.

2.1 Scrap Suppliers

All suppliers of scrap steel cans will be issued with a letter to inform them of historic problems and ask, where possible for tin cans to be treated prior to arrival on site. In addition, CELSA will continue to use cleaner suppliers of scrap steel cans as well as increase the purchase of shredded tin cans over loose.

Where scrap steel cans are sourced from CELSA owned scrap yards, a treatment programme will be in place from the 1st week of April until the end of September to ensure that the cans arriving to site do not support the breeding of flies.

2.2 Storage

All scrap steel cans brought to site (via rail/lorry) will be stored in two designated locations. The primary location will be in the old melt shop, undercover and out of reach from direct sunlight. The second location will be a designated area in the scrap bay, in preparation for loading into the electric arc furnace basket. This area is partially sheltered, limiting the amount direct exposure to sunlight.

Stockpiles will be inspected on a daily basis to ensure cans are being held in the appropriate areas.

2.3 Inventory & Consumption

The maximum inventory of scrap steel cans on site from April to September will be 6,000 tonnes.

The tonnage of scrap steel cans in each melt throughout the day will be in accordance with maintaining an inventory of 6,000 tonnes.

2.4 Treatment of Scrap Steel Cans

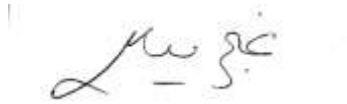
The environmental team will arrange for a professional pest control expert to attend site on a weekly basis from 1st April until 30th September. If it is deemed necessary then spraying can be conducted on a fortnightly basis however, we believe that starting in April will eliminate the need to do so. All cans will be treated with a suitable pesticide to kill and deter the breeding of flies. The pest specialist will issue reports after each treatment where fly activity and treatment status will be recorded. In addition, fly bags will be placed along the perimeter fence to monitor the effectiveness of spraying and ensure control measures are working. Fly bags will be changed on a monthly basis, with weekly inspections conducted by the Environmental team to monitor all progress.

3.0 Conclusions

We believe that the above management plan covers the requirements laid out in the CAR_NRW0035625 form. As detailed above, the management plan will ensure that minimal environmental impact will be seen on and off site during the fly breeding season which is during April to September.

Should you require any further information regarding these works please do not hesitate to contact me.

Yours sincerely

A handwritten signature in dark ink, appearing to read 'G. Nizam', with a horizontal line underneath the first part of the name.

Gabriella Nizam
Environmental Advisor