

Compliance Assessment Report

Report ID:
CAR_NRW0036275

This form will report compliance with your permit as determined by an NRW officer

Site	Cardiff Rod & Bar Mill EPR/BV0759IC	Permit Ref	BV0759IC		
Operator/Permit holder	Celsa Manufacturing UK Ltd				
Regime	Installations				
Date of assessment	04/02/2020	Time in	N/A	Out	N/A
Assessment type	Report/Data Review				
Parts of the permit assessed	Returns				
Lead officer's name	Taylor, Richard				
Accompanied by					
Recipient's name/position	Richard Lewis/Gabriella Nizam/ Environmental Management	Date issued	05/02/2020		

Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations or the licence under the Water Resources Act 1991 as amended by the Water Act 2003. A detailed explanation is captured in "Compliance Assessment Report Detail" (Section 2) and any actions you may need to take are given in the "Action(s)" (section 4). This summary details where we believe any non-compliance with the permit has occurred, the relevant condition and how the non-compliance has been categorised using our Compliance Classification Scheme (CCS). CCS Scores can be consolidated or suspended where appropriate, to reflect the impact of some non-compliances more accurately. For more details of our CCS scheme, contact your local office.

Permit conditions and compliance summary	CCS Category	Condition(s) breached
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KEY: See Section 5 for breach categories, suspended scores will be indicated as such.

A = Assessed or assessed in part (no evidence of non-compliance), **X** = Action only,

O = Ongoing non-compliance, not scored.

Number of breaches recorded	0	Total compliance score (see section 5 for scoring scheme)	0
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If the Number of breaches recorded is greater than zero, please see Section 3 for our proposed enforcement response

Section 2 – Compliance Assessment Report Detail

This section contains a report of our findings and will usually include information on:

- The part(s) of the permit that were assessed (eg. Maintenance, training, combustion plant, etc)
- Where the type of assessment was 'Data Review' details of the report/results triggering the assessment
- Any non-compliances identified
- Any non-compliances with directly applicable legislation
- Details of any multiple non-compliances
- Information on the compliance score accrued inc.
- Details of advice given
- Any other areas of concern
- Any actions requested
- Any examples of good practice
- A reference to photos taken

BV0759IC Celsa Rod and Bar Mill

Site sent their annual returns through to NRW on time. These have been assessed and comments made as follows.

Annual Returns

- A2, EW1, R1 & PI1 – Received on time.
- Millscale consists of approximately 50% of the total wastes produced by site in 2019. All wastes are sent for recovery.
- Production is up by approximately 15 over 2018.
- Water use is down on last year.
- Use of oil per tonne of product has risen by nearly 50% over 2018 figures.

Pc 4.1.5 EMS Annual Improvement Targets

- The R&B mill used 8.9% more gas per tonne of product in 2019 than targeted. The new target for 2020 remains close to the 2019 figure.
- Similarly, the target for electricity was exceeded by 2%.
- Non-hazardous waste produced per month was averaged at 15.69 against a target of 10.1 tonnes.
- The target for hazardous waste was exceeded with 9.16 tonnes against the 9.6 tonnes per month target.
- Oil use per tonne of product remains a target. The 2019 performance for this exceeded the 0.25 litres per tonne product with 0.46. Fresh targets have been set for all the above parameters with site continuing to work towards these.
- The report was accepted in full.

Pc 4.1.4 Fugitive Emissions annual review.

- Following the breach of permit limits of oil and hydrocarbons to surface water on 27th Nov 2019, the site has reviewed its internal procedures and is in the process of fitting alarms as an extra measure. This is welcomed by NRW.
- The site has adopted the latest guidance concerning storage of oil on site and conducts monthly internal

audits.

- The report was accepted in full.

Pc 2.8 Accident Prevention and Control.

- The site carries out mock spillages as training with the EHS which is an example of good practice.
- The plan has been updated with the measures included in 4.1.4.
- The plan is 2 yearly unless there is an incident on site. Therefore, the next report under pc2.8 is due in 2022.
- The report has been reviewed and accepted in full.

Pc 2.7 Energy Management

- The main reheat furnace on site has been in place since 1976, so any improvements in efficiency are likely to be retrofitted.
- Improvements in energy efficiency are mostly linked to efficiency of the existing plant.
- Site has committed to a number of energy saving initiatives during 2020 and beyond which are encouraging.
- The report has been reviewed and accepted in full.

Q4 Report Oct – Dec 2019 inclusive

- NRW received the Q4 reports for emissions to Air and Water within the permitted time limit.
- The quarterly NOx reading of 262.65mg/m³ was within the maximum permitted mark of 400mg/m³.
- All parameters for water release were found to be within permit limits and accepted in full.

End.

EPR Compliance Assessment Report

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Operator/Permit holder	Celsa Manufacturing UK Ltd	Date	04/02/2020

Section 3 – Enforcement Response

You must take immediate action to rectify any non-compliance and prevent repetition.

Non-compliance with your permit conditions constitutes an offence and can result in criminal prosecutions and/or suspension or revocation of a permit. Please read the detailed assessment in Section 2 and the steps you need to take in Section 4 below.

Other than the provision of advice and guidance, at present we do not intend to take further enforcement action in respect of the non-compliance identified above. This does not preclude us from taking enforcement action if further relevant information comes to light or advice isn't followed.

Section 4 – Action(s)

This section summarises the actions identified during the assessment along with the timescales for when they will need to be completed.

Criteria Ref.	CCS Category	Action required/advised	Due Date
See Section 1 above			

Section 5 – Compliance notes for the Operator

To ensure you correct actual or potential non-compliance we may

- Advise on corrective actions verbally or in writing
- Require you to take specific actions verbally or in writing
- Issue a notice
- Require you to review your procedures or management system
- Change some of the conditions of your permit
- Decide to undertake a full review of your permit

Any breach of a permit condition is an offence and we may take legal action against you

- We will normally provide advice and guidance to assist you to come back into compliance either after an offence is committed or where we consider that an offence is likely to be committed. This is without prejudice to any other enforcement response that we consider may be required.
- Enforcement action can include the issue of a formal caution, prosecution, the service of a notice and/or suspension or revocation of the permit.

See our Enforcement and Civil Sanctions guidance for further information

This report does not relieve the site operator of the responsibility to

- Ensure you comply with the conditions of the permit at all times and prevent pollution of the environment
- Ensure you comply with other legislative provisions which may apply

Non-compliance scores and categories

CCS category	Description	Score
C1	A non-compliance that could have a major environmental effect	60
C2	A non-compliance which could have a significant environmental effect	31
C3	A non-compliance which could have a minor environmental effect	4
C4	A non-compliance which has no potential environmental effect	0.1

Operational Risk Appraisal (Opra) - Compliance assessment findings may affect your Opra score and/or your charges. This score influences the resource we use to assess permit compliance.

Section 6 – General information

Data protection notice

The information on this form will be processed by the Natural Resources Wales (NRW) to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s). The NRW may also use and/or disclose it in connection with:

- Offering/providing you with its literature/services relating to environmental matters
- Consulting with the public, public bodies and other organisations (eg. 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 its service
- Freedom of Information Act/Environmental Regulations request

The NRW may pass it on to its agents/representatives to do these things on its behalf. You should ensure that any persons named on this form are informed of the contents of this data protection notice.

Disclosure of information

The NRW will provide a copy of this report to the public register(s). However, if you consider that any information contained in this report should not be released to the public register(s) on the grounds of commercial confidentiality, you must write to your local area office within fifteen working days of receipt of this form indicating which information it concerns and why it should not be released, giving your reasons in full.

Customer charter

What can I do if I disagree with this compliance assessment report?

If you are unable to resolve the issue with your site officer, you should firstly discuss the matter with officer's line managers using the informal appeals procedure. If you wish to raise your dispute further through our official Complaints and Commendations procedure, phone our general enquiry number 0300 065 3000 (Mon to Fri 08.00 – 18.00) and ask for the Customer Contact team or send an email to enquiries@naturalresourceswales.gov.uk. If you are still dissatisfied you can make a complaint to the Public Services Ombudsman for Wales. For advice on how to complain to the Ombudsman phone their helpline on 0845 607 0987.

Welsh Language

If you would like this form in Welsh please contact your Regulatory Officer.