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31st January 2020

Mrs E A Parr
PPC Compliance Assistant
Natural Resources Wales
Rivers House
St Mellons Business Park
St Mellons
CARDIFF
CF3 0EY

Our Ref: w:\Environment Agency\Permit Reporting\Rod and Bar Mill\Returns\EA\Annual\2019\BV0759IC 4.1.5 Annual Returns 2019.doc

Dear Mrs Parr,

RE: Rod and Bar Mill EPR Permit BV0759IC 4.1.5 Annual Returns 2019

In accordance with CELSA Manufacturing UK Ltd Environmental Permitting Regulations (EPR) Rod and Bar Mill Permit BV0759IC, permit condition 4.1.5 requires the following:

4.1.5 Where the Operator has a formal environmental management system applying to the Permitted Installation which encompasses annual improvement targets the Operator shall, not later than 31 January in each year, provide a summary report of the previous year's progress against such targets.

The following information summarises the CELSA EMS Objectives and Targets for 2019.

1.0 Consume no greater than 326 kWh/tonne of gas per month

A number of energy efficiency measures continued in 2019, such as hot charging of billets but unfortunately, the overall gas consumption totalled to 355 kWh/tonne.

A new gas consumption target of 326.56 kWh/tonne has been set for 2020.

2. 0 Consume no greater than 100 kWh/tonne of electricity per month

The RBM consumed on average 102 kWh/tonne of electricity per month and therefore exceeded the target set. Electricity is tracked on a daily basis and optimising its use is a key KPI for all RBM employees.

A further electricity reduction target has been set for 2020 of 101.84 kWh/tonne.

3.0 Reduce general waste to 10.1 tonnes per month

The objective was to achieve a general waste tonnage output of no more than 10.1 tonnes per month at the Rod and Bar Mill.

The Rod and Bar Mill produced 15.69 tonnes per month, so were unable to achieve the target set in 2018

A benchmark value has been set at 10 tonnes per month. This will be carefully monitored with all progress tracked and communicated through the monthly EMS meetings. Monthly walkabout will enable actions to be tracked with any issues relating to waste segregation recorded on Prosafety. In addition, there will be a renewed focus on waste segregation in the Environmental awareness training.

4. 0 Reduce hazardous waste to 9.6 tonnes per month

The objective was to achieve a hazardous waste tonnage output of no more than 9.60 tonnes per month at the Rod and Bar Mill. The Rod and Bar Mill achieved this target, with an average of 9.16 tonnes per month being produced.

A benchmark value has been set for 2020, with a renewed focus on oil reduction which will lead to a continued decrease in hazardous waste produced.

5. 0 Reduce oil consumption to 0.25 litres/tonne of finished product (per month)

This objective was to consume no greater than 0.25 litres/tonne of finished product (per month) at the Rod and Bar Mill. Unfortunately this target was not met, with 0.46 litres/tonne of finished product (per month) being consumed.

The target for 2020 has been set, to reduce oil consumption to 0.25 litres/tonne.

Should you require any further information regarding permit condition 4.1.5 and the above please do not hesitate to contact me.

Yours sincerely



Gabriella Nizam
Environmental Advisor

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