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31st January 2020

Mrs E A Parr
EPR Compliance Assistant
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Our Ref: w:\Environmental\IPPC\Environment Agency Reporting\Permit Reporting\Section Mill>Returns\Annual\2019 \4.1.5
Annual Returns 2019.doc

Dear Mrs Parr,

RE: Section Mill EPR Permit BV0767 4.1.5 Annual Returns 2019

In accordance with CELSA Manufacturing UK Ltd Environmental Permitting Regulations (EPR) Section Mill Permit BV0767, 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's Section Mill EMS Objectives and Targets for 2019.

1.0 Reduce gas consumption (kWh/tonne) by 2% based on 2018

This objective was to reduce gas consumption to 420.9 kWh/tonne at the Sections Mill.

Unfortunately, the Sections Mill did not achieve target, instead a consumption of 444 kWh/tonne was seen in 2019. The main issue is the large range of products and resulting high number of changeovers, which affects efficiency of the furnace. Similarly, the vast product changeovers affect the ability to fully implement 'hot charging' within the mill.

The gas consumption target for 2020 has been set to 420.9 kWh/tonne.

2.0 Consume no greater than 87 kWh/tonne of electricity in 2019

The objective was to keep consumption at 87 kWh/tonne; unfortunately, the Sections Mill fell short of the target, missing it by 1%, with an average 88 kWh/tonne of electricity in 2019.

A target to consume no greater than 86.8 kWh/tonne of electricity has been set for 2020.

3.0 Reduce general waste production (tonnes per month) by 5% compared to 2018. Target 5.7 tonnes/month

The Sections Mill were unable to achieve their target. The result in 2019 was 8.44 tonnes/month.

The improvements such as improved communication through signage, put forward from 2017 were successful implemented as seen in the results from 2018. Moving forward, actions from monthly walkabouts will continue to be recorded on ProSafety, with a push for waste segregation. Further efforts are being implemented to remove wood and mixed recycling from the general waste stream. In addition, pre-shutdown discussions are aimed to ensure that any other waste streams are appropriately segregated and not sent off site as general waste.

A general waste target has been set for 2020 at 5.7 tonnes per month.

4.0 Reduce commercial water consumption (m³/tonne per month) by 10% compared to 2018

The objective was to consume no greater than 0.2m³ per tonne per month of commercial water in the Sections mill. The Sections Mill were unable to achieve target, consuming 0.29m³/tonne per month.

The commercial water consumption target has been set to no greater than 0.2m³/tonne in any month for 2020.

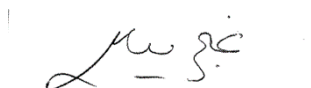
5.0 Reduce oil consumption (l/tonne per month) by 12.5% compared to 2018

This objective was to consume no more than 0.577 litres/tonne of finished product (per month) at the Sections Mill. Unfortunately, the Sections Mill did not meet the target, consuming 0.77 litres/tonne per month on average.

An oil consumption target of 0.577 litres/tonne has been agreed with the engineers for 2020, which will be a 25% reduction compared with 2019.

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

Yours sincerely,



Gabriella Nizam
Environmental Advisor