

Compliance Assessment Report CAR_NRW0037462

Permit being assessed: BV0759IC.

For: Cardiff Rod & Bar Mill EPR/BV0759IC, held by Celsa Manufacturing UK Ltd
At: PO Box 83 Cardiff Rod & Bar Mill Castle Works , East Moors Road, Tremorfa, Cardiff, South Wales, CF24 5NN.

Type of assessment carried out: Report/Data Review, Reason: Routine.

On 31/12/2020.

Parts of permit assessed: Annual returns

NRW Lead Officer: Richard Taylor.

Report sent to: Hannah Mayled, Environment Graduate on 05/02/2021.

1. Summary of our findings (full details in section 4)

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	C4 No impact	2.10
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	C4 No impact	2.10
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	C4 No impact (Suspended)	2.10

Result types are explained in more detail in the 'Important Information' section below.

Total number of non-compliances recorded	Total non-compliance score
3	0.2

How we use the non-compliance score to calculate your annual fee is explained in the 'Important Information' section below.

2. What action is required?

Criteria	Action needed	Complete by
G4	Ensure full suite of permit substances are monitored and reported as per permit requirements	31/03/2021
G4	Ensure full suite of required substances are reported as per permit conditions	31/03/2021
G1	None - site reintroduced monitoring for Q2,Q3 and Q4.	Already completed

Action criteria codes are listed in the 'Important information' section below.

3. What will happen next?

Any non-compliance we have identified and recorded on this form is an offence. It can result in criminal prosecution and/or suspension or revocation of your permit.

At this time, we do not intend to take any further action.

This statement does not stop us from taking additional enforcement action if further relevant information comes to light or offences continue.

4. Details of our assessment

Celsa Bob and Bar Mill BV0759IC

2020 Annual CAR report

The following is a summary of the Quarterly reports submitted to NRW throughout 2020.

Water results

Q1 2020 - Site notified NRW on 2nd March that they had a reading of 5.68mg/l for hydrocarbon to water in Jan 2020 against a permit limit of 5mg/m3. The water was held back on site and not released until it was below the permit limit. This is a breach of permit limits without an environmental effect. No penalty score was applied.

Q2 2020 – Site met all permit limits during the quarter.

Q3 2020 - Site reported a measured excess of free chlorine at 0.22mg/l against a permit limit of 0.1mg/l. The volume was not released outside the site and therefore not classified as a permit breach. This is a measured limit breach without an environmental effect. No penalty score applied.

1st July instrument failure. The site had water quality instrument failure between 1st July and 3rd August. The instrument was subsequently replaced. No water emission took place in the interim period. NRW received a schedule 5 notification on time.

On 21st July the submitted lab results had omitted results for 3 substances – nickel, chlorine, and iron. The fault was traced to laboratory omitting these 3 species. Changes have subsequently been made so that orders can be checked, and results can be accessed by the environmental team before they are issued. No permit breach is given for this incident as the fault lay with the contracted lab.

Q4 2020 - 24th Nov 2020 - Site reported a breach of the free chlorine limit at 0.11mg/l against a permit limit of 0.1mg/l. The water was held on site and not released into the dock. No penalty score applied.

24th Nov 2020 – Site also reported a limit breach of hydrocarbons with a reading of 6.2mg/l over a limit of 5.0mg/l. The water was not released to the dock until levels returned to permitted levels. Calibration checks were carried out on the instrument. It was found that an incorrect calibration factor was used which skewed the results. The water was subsequently analysed and found to be 1.9mg/l. No release was made until the checks showed the true readings were within permit limits.

October's water quality results signed on 17th Nov 2020 omitted results for Nickel and Iron. NRW were not informed of this through the accompanying report or through any other means of communication. The omission of data constitutes a permit noncompliance. In this case the noncompliance is for the non-reporting of 2 substances during October namely Nickel and Iron. The permit condition regarding

monitoring requirements is pc2.10. The December results showed the limits were well within the permit levels for these two substances.

NRW impose two Cat 4 breaches of permit condition 2.10 governing periodic monitoring. 2 substances were not reported for October 2020 namely dissolved Nickel and Iron to water. Both substances individually score a Cat 4 for noncompliance in Q4.

Releases to Air

Q1 Air– No results were submitted due to access lockdown from the Covid 19 pandemic. This was accepted by NRW at the time.

Due to Covid 19, the stack monitoring scheduled for March 2020 were postponed. Site sent a schedule 5 notification to NRW on during March to notify us of the decision. NRW took a position that we would record missed samples due to Covid 19 as non-compliances, but not apply a penalty score. This is for missing the scheduled monitoring to air from the permitted release points for Q1 due to the imposition of Covid 19 restrictions at the time.

Therefore, we record a noncompliance of permit condition 2.10 for not carrying out emissions to air monitoring during Q1 2020. However, this is not scored as a permit breach following the NRW decision.

Q2 Air– Site reported a representative spot sample for NO₂ at 171mg/m³ against a permit limit of 400mg/m³.

Q3 Air– Site reported NO₂ at 272mg/m³ against a limit of 400mg/m³.

Q4 Air– Site reported NO₂ at 395.01 against a limit of 400mg/m³. This is close to the permit limit. Site need to be aware of this approach to limit and ensure that systems are functioning correctly, and servicing intervals are being correctly adhered to in order to not breach this limit during the next scheduled monitoring.

Pc4.1.4 Fugitive emissions report

Received 29th Feb 2021. Accepted in full.

Pc4.1.5 Annual KPI report.

Received 29th Feb 2021. The target for gas kw/tonne product and the target for electricity per month were missed. New targets have been set for 2021.

The target for waste generation per tonne of product was missed with the site registering 25% over target value. The same target for 2021 has been reapplied.

Oil consumption per tonne product was similarly exceeded by 56% with the same target as 2020 being reapplied for 2021.

The production of Hazardous waste target was met with an approximate 40% measure under target value.

Water use per tonne product was achieved with a figure of 0.11m³/tonne which was substantially below the 0.19m³/tonne target.

Annual Returns A2, R1, PI1.

The returns were received before the permit reporting deadline of 29th Jan 2021 and accepted in full.

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Complaints – NRW received 5 complaints against the R&B mill during 2020. None of which were substantiated.

3 noise complaints made against the site in June 2020. The root cause was thought to be a circulating fan gearbox on the water treatment facility and subsequently fixed. Also, the fan was to be switched off during unsociable hours. No penalty score was applied to the site. A definite correlation between the fan noise and the noise experienced by the complainants could not be confirmed. The site responded appropriately to the complaints and took steps to look at their operation and improve the noise levels.

Another complaint for noise was made in August regarding a loud ticking noise from site. As repairs were made to a fan gearbox in June, the plant reported normal operation, but that a number of doors were likely to have been left open during the summer nights. These were subsequently closed, and no further complaints were received. No direct correlation between the complainant and the site could be established. No penalty score applies. 22 Sept 2020 - A complaint was received in September regarding suspected pollution in the dock which the R&B mill discharges. An NRW investigation revealed that the discharge point into the dock had not been used since Sept 1st and the complaint was unsubstantiated.

End.

If you have any queries about this report, or to discuss completion of any actions, please contact the NRW Officer named above.

Important information

Legal status of this report

Your permit is issued to you under the Environmental Permitting Regulations. You have a responsibility to comply with the conditions of your permit and prevent pollution/harm of the environment. You must also ensure that you comply with any other relevant legislation that may apply to your site's operations.

This report explains the findings of our assessment and any action you are required to take. We categorise non-compliance using our guidance for assessing non-compliance at regulated sites.

When we find potential non-compliance/s we will normally give you advice on how to maintain compliance.

To correct non-compliance, we may:

- require you to take specific actions
- issue a notice
- review the conditions of your permit.

Any advice and guidance we give will be without prejudice to any other enforcement response that we consider may be required.

Assessment results and non-compliance categories (used in section 1):

Assessment result	Description
Assessed (A)	Assessed or assessed in part, no evidence of non-compliance found
Action only (X)	Action only relating to the activity assessment
Ongoing (O)	Ongoing non-compliance, not scored

Non-compliance category	Description	Score
C1 Major	Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property	60
C2 Significant	Potential to have a significant impact or effect on the environment, people and/or property	31
C3 Minor	Potential to have a minor or minimal impact or effect on the environment, people and/or property	4
C4 No environmental impact	Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property	0.1

How we use assessment scores

The number and severity of non-compliances recorded in a year will affect your annual subsistence fee the following year. A non-compliance factor is added to your site's Operator

Performance Risk Appraisal (OPRA) score when we calculate your fee to reflect the additional resource we use to assess permit compliance.

What are suspended scores?

In line with our guidance, we may suspend scores for up to six months to allow time for remedial action to be taken. Suspended scores will be re-instated if the action is not completed.

Full list of Industry and Waste action criteria (used in section 1 and 2):**A: Permitted activities**

- A1 Specified by permit

B: Infrastructure

- B1 Infrastructure – Engineering for prevention and control of emissions
- B2 Infrastructure – Closure and decommissioning
- B3 Infrastructure – Site drainage engineering (clean and foul)
- B4 Infrastructure – Containment of stored materials
- B5 Infrastructure – Plant and equipment

C: General management

- C1 General management – Staff competency/training
- C2 General management – Management system and operating procedures
- C3 General management – Materials acceptance
- C4 General management – Storage, handling, labelling and segregation

D: Incident management

- D1 Incident management – Site security
- D2 Incident management – Accidents, emergency and incident planning

E: Emissions

- E1 Emissions – Air
- E2 Emissions – Land and groundwater
- E3 Emissions – Surface water
- E4 Emissions – Sewer
- E5 Emissions – Waste

F: Amenity

- F1 Amenity – Odour
- F2 Amenity – Noise
- F3 Amenity – Dust/fibres/particulates and litter
- F4 Amenity – Pests/birds and scavengers
- F5 Amenity – Deposits on road

G: Monitoring and records, maintenance and reporting

- G1 Monitoring and records, maintenance and reporting – Monitoring of emissions and environment
- G2 Monitoring and records, maintenance and reporting – Records of activity, site diary/journal/events
- G3 Monitoring and records, maintenance and reporting – Maintenance records
- G4 Monitoring and records, maintenance and reporting – Reporting and notification to Natural Resources Wales

H: Resources efficiency

- H1 Resource efficiency – Efficient use of raw materials
- H2 Resource efficiency – Energy efficiency

Enforcement response

Any permit condition non-compliance is an offence and we may take legal action against you. Action we take can include prosecution, serving a notice on you and/or suspension or revocation of your permit. See our Enforcement and Sanctions Guidance for further information.

Data protection notice

You should make sure that anyone named in this report knows that the information it contains will be processed by Natural Resources Wales to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s).

We may also use and/or disclose the report in connection with:

- offering or providing you with our literature or services relating to environmental matters
- consulting with the public, public bodies and other organisations (e.g. 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 our service
- Freedom of Information Act or Environmental Information Regulations requests.

We may also pass it on to our agents or representatives to do these things on our behalf.

Disclosure of information – this report will be available to view on-line

If you think this report contains commercially confidential information that should not be placed on our public register, you must contact your local Natural Resources Wales office within **fifteen working days** of receiving this report, using the contact details in the accompanying email or letter. You must give a full explanation of why it should not be added to our public register, including specifying which information is commercially confidential. We will assess your request and respond to you within 20 working days to let you know if we agree to your request.

What do I do if I disagree with the report or have a complaint?

If you disagree with this compliance assessment report, you should contact the lead officer without delay to discuss your concerns.

If you are unable to resolve the issue with the lead officer or their line manager you should contact our Customer Contact team on 0300 065 3000 (Monday to Friday 08:00 – 18:00), or email enquiries@naturalresourceswales.gov.uk for details of how to raise your dispute further through our Complaints and Commendations procedure.

If you are dissatisfied with our response, you can contact the Public Services Ombudsman for Wales by phone on 0300 7900203 or by email at ask@ombudsman.wales

Welsh Language Standards

We are committed to establishing Natural Resources Wales as a naturally bilingual organisation. We will provide compliance reports in your preferred language.