

Compliance Assessment Report CAR_NRW0037507

Permit being assessed: TP3639BH.

For: Tremorfa Melt Shop , held by Celsa Manufacturing UK Ltd

At: Tremorfa Works New Melt Shop Seawall Road , Tremorfa, Cardiff, South Wales, CF24 5TH.

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, Environmental 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
B5 - Infrastructure - Plant and equipment	C3 Minor	3.1.1

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

Total number of non-compliances recorded	Total non-compliance score
1	4

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
B5	Action completed, review, replace part, system start procedure review.	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 Meltshop Permit TP3639BH

Annual round-up of 2020 reports.**1. Schedule 5 Notifications**

Site sent in notifications to NRW each time a half hourly reading exceeded the permit limit. A new permit variation V008 was issued on 10th Feb which subsequently removed this requirement.

2. Permit variations

Variation V008 came into force on 10th Feb 2020 adding the asphalt plant to the meltshop permit. The variation also removed the requirement to report CO monitoring results. The permit variation also regulates a newly constructed integrated scrap metal recycling centre. This recycles, both on-site and off-site, 36,000 tonnes per annum of fines which are separated from ferrous feedstock material and circa 95% of which are currently sent to landfill.

Variation V009 took effect on 5th May and brought the slag processing operation under the permit. This remains the current variation in operation.

3. TOPAS results. Q1, Q2, Q3, and Q4 results were received on time. Problems occurred with the monitors during the year which necessitated a surrogate monitor being used at Baden Powell school. Further complications with the school closures during the year which knocked out the power supply to the monitors. This resulted in missing data for a period between 27th Nov and 8th December inclusive resulting in 355 out of 365 valid ambient air quality days for PM10 and 354 for PM2.5. The issues with power supply were reported to NRW at the time. As the missing data comprised a small portion of the yearly results, an average value for the year is used as a substitute in order to compare the results to UK air quality standards. Note, the figures are for ambient air and include all sources, not just those from Celsa and is used as a guide only.

The average daily pm10 figure for the year was 24.98ug/m3. The EU and UK objective limit for PM10 is currently 40ug/m3 per year.

The PM2.5 standards are set as a 3 year rolling average with reductions set at 20% under the 25ug/m3 target for 2010-2020 means that the target was 20ug/m3. The results for PM2.5 from the Topas for 2020 averaged 9.89ug.m3.

4. Complaints

NRW recorded the following complaints against the Meltshop permit during 2020.

Apr 12th – Odour complaint WIRS 2002558. Unsubstantiated

May 13th – Dust complaint WIRS 2003302. Site carried out repair to cladding. No further action.

May 29th- Fly complaint WIRS 2003758. Unsubstantiated.

Aug 7th - Fly complaint, dust complaint WIRS 2005647. Site visited, unsubstantiated. Site minimises pile of scrap cans. Repairs carried out to DED plant.

Sept 22th - Dust complaint WIRS 2006864. Unsubstantiated.

Dec 10th – Smoke complaint WIRS 2008579. Booster fan not switched on. Improvements subsequently made.

5. Schedule 5 notifications

NRW received the following notifications from site during 2020.

Note CO limit exceedances not included.

23 Jan – Particulate limit permit exceedance. Itemised in CAR form for Q1 2020.

29th Apr - CEMS failure Covered in CAR form 2020 09 23. From nearby Baden Powell school was agreed to be used in the interim with NRW.

5th Aug - 2 x Particulate limits breaches. Itemised in CAR form for Q3 returns.-

12th Aug - TOPAS failure Willowbrook school 30th June – substitute monitoring data used in interim period until 20th October.

26th Nov - TOPAS switched off at Willowbrook school. Baden Powell data also unavailable for the period

26th Nov to 9th Dec. Data gap for a ten-day period. Fault understood to be outside control of CELSA.

Communications subsequently improved and data gap average used by NRW to cover the missing data.

12th Dec – Dust from MS roof. Linked to Complaint on 10th Dec. Root cause was a fault with a sensor which showed the booster fan damper as being open when it was reportedly closed. Further inspection pointed to a possible wiring failure in the high humidity and dust levels in the meltshop. This led to a 20-minute period of an uncontrolled emission to air which was photographed by a local resident and formed the basis of WIRS 2008579.

NRW impose a Cat 3 breach of permit condition 3.1.1. where there shall be no emission except from the sources listed within the permit. We understand that the situation is now remedied, and prestart checks have been put in place to ensure the incident is not repeated.

6. Surface water

The new permit variation has brought in a requirement to sample the soakaway water from the asphalt plant on a 6-month basis. The first sample results are expected as soon as possible after the construction of the SUDS Soakaway, with a second sample due before the 1st July 2021 as detailed on email sent to site on 8th Jan 2021. This is so that the 6 monthly monitoring periods are not missed and to bring the sampling back in line with the permit requirements at Permit V009 table S4.1.

7. Status of permit deadlines and extensions.

- IC6 - A 3-month extension to IC6 dust monitoring was granted with the new deadline set for 31st Jan 2021. This was due to the ongoing affects of the availability of personnel due to Covid 19. **Site are reminded that this is a requirement and needs to be sent ASAP as it is currently overdue. Ref Permit V009 IC6 at table S1.3.**
- Dust abatement retro-fitting alarms – The Jan 31st, 2021 date was set as the deadline for the site to review and evaluate the inclusion of increased inspection of dust abatement filters and investigation of fitting alarms so that increasing dust levels in the plant can be signalled for corrective action. **The report on the above was due 31st Jan 2021 as laid down in CAR_NRW0037207. Please send the report ASAP as this is currently overdue.**
- Asphalt plant SUDS completion – 1st results are expected as soon as practicably possible after the SUDS completion with the second before the 1st July 2021 deadline as discussed above.

8. Annual returns

These were submitted on time on 29th Jan 2021.

- 4.2.2 Annual performance report. The report claimed to have received 3 complaints during 2020. This contradicts NRW's record of 6 complaints which were recorded as above. These were, 3x dust, 2x fly, and 1 x odour complaints. Therefore, NRW do not accept the claims at 1.1 in the 4.2.2 report.
- Sections Mill – notable increase in water use per tonne of product reported in 2020.
- Meltshop waste – notable reductions despite missing annual target.
- A Carbon injection system was installed in meltshop as a response to the dioxin limit breaches earlier in 2019. The system is a welcome addition. This has reportedly lowered the dioxin levels already. Other changes put into place during 2020 in response to the complaints and issues raised above are a welcome improvement and listed below;

Replacement of hydraulic piping in EAF system

Changing of burner valves

T4/T5 cable replacement

Booster fan changes and repairs in dust filter plant Primary duct of DED plant replacement

Renewal of EAF Turret cabling

Cooling tower cleaning

Water treatment plant oil and grease tank emptied.

Annual air emissions.

A1 stack results were all within permit parameters. One notable result was the reduction in Dioxin limits which were exceeded in 2019. As a result of the measures taken by the site, these were well below the permit limit 0.1 ng/m³ with 0.023ng/m³. This is an example of good management practice.

Wastewater

All emissions reported for S1 and S2 were within permit limits.

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.