

29th January 2021

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\2020\BV0759IC 4.1.5 Annual Returns 2020.doc

Dear Mrs Parr,

RE: Rod and Bar Mill EPR Permit BV0759IC 4.1.5 Annual Returns 2020

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 2020.

1.0 Consume no greater than 348.7 kWh/tonne of gas per month

A number of energy efficiency measures continued in 2020, such as hot charging of billets but unfortunately, the overall gas consumption totalled to 375.94 kWh/tonne.

A new gas consumption target of 360.7 kWh/tonne has been set for 2021.

2.0 Consume no greater than 103 kWh/tonne of electricity per month

The RBM consumed on average 107.45 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 2021 of 101.89 kWh/tonne.

3.0 Reduce general waste to 10 tonnes per month

The objective was to achieve a general waste tonnage output of no more than 10 tonnes per month at the Rod and Bar Mill in 2020.

The Rod and Bar Mill produced 12.05 tonnes per month, so were unable to achieve the target set for 2020.

The target for 2021 has been reset 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.

4.0 Reduce hazardous waste to 5.25 tonnes per month

The objective was to achieve a hazardous waste tonnage output of no more than 5.25 tonnes per month at the Rod and Bar Mill. The Rod and Bar Mill achieved this target, with an average of 3.54 tonnes per month being produced.

Although the Rod and Bar Mill surpassed the 2020 target, reasons for this are probably down to lower running hours and production due to COVID-19. Therefore, the target for 2021 has been set at 5 tonnes per month.

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 0.39 litres/tonne of finished product (per month) being consumed.

The target for 2021 has been set, to reduce oil consumption to 0.25 litres/tonne.

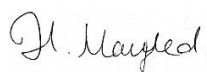
6.0 Reduce water usage to 0.19m³/tonne per month

This objective was to consume no more than 0.19m³/tonne per month of water at the Rod and Bar Mill. This target was achieved with 0.11m³/tonne of water used per month.

The target for 2021 has been set to 0.11m³/tonne of water used per month. This target was chosen to sustain levels of 2020, whilst having increased production hours.

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

Yours sincerely



Hannah Mayled
Environmental Graduate