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29th January 2021

Mrs E A Parr
EPR Compliance Assistant
Natural Resources Wales
Rivers House
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Our Ref: w:\Environmental\IPPC\Environment Agency Reporting\Permit Reporting\Section Mill>Returns\Annual\2020 \4.1.5
Annual Returns 2020.doc

Dear Mrs Parr,

RE: Section Mill EPR Permit BV0767 4.1.5 Annual Returns 2020

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 2020.

1.0 Reduce gas consumption to 420.9 kWh/tonne per month

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 470 kWh/tonne was seen in 2020. 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. Gas is still used on 'down' days in the Section Mill, so the kWh/tonne is impacted by days when there is no output. Covid-19 also had an impact on usage as the market was less stable, this meant that the consumption of gas was erratic.

The gas consumption target for 2021 has been set to 440 kWh/tonne.

2.0 Consume no greater than 86.8 kWh/tonne of electricity per month in 2020

The objective was to keep consumption at 86.8 kWh/tonne; unfortunately, the Sections Mill fell short of the target, with an average 92.3 kWh/tonne of electricity in 2020. Electricity is still used on 'down' days in the Section Mill, so the kWh/tonne is impacted by days when there is no output. Covid-19 also had an impact on usage as the market was less stable, this meant that the consumption of electric was erratic.

A target to consume no greater than 86.8 kWh/tonne of electricity has been set for 2021.

3.0 Reduce general waste production to 5.7 tonnes/month in 2020

The Sections Mill were able to achieve and surpass their target. The result in 2020 was 4.68 tonnes/month. Nearly a 50% decrease on 2019 (8.44 tonnes/month).

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, which will further reduce the tonnage per month.

A general waste target has been set for 2021 at 4.6 tonnes per month.

4.0 Reduce commercial water consumption to 0.2 m³/tonne per month

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 0.36m³/tonne per month.

The commercial water consumption target has been set to no greater than 0.35m³/tonne in any month for 2021.

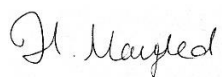
5.0 Reduce oil consumption to 0.58 l/tonne per month in 2020

This objective was to consume no more than 0.58 litres/tonne of finished product (per month) at the Sections Mill. Unfortunately, the Sections Mill did not meet the target, consuming 0.96 litres/tonne per month on average.

An oil consumption target of 0.57 litres/tonne has been agreed with the engineers for 2021.

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

Yours sincerely,



Hannah Mayled
Environmental Graduate

