

Compliance Assessment Report CAR_NRW0037847

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: Site Inspection, Reason: Routine.

On 10/06/2021.

Parts of permit assessed: 1.1, 2.1, 3.3. 3.4, 3.5,

NRW Lead Officer: Richard Taylor.

Report sent to: Hannah Powell, Environment Manager on 11/06/2021.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
C2 - General Management - Management system and operating procedures	Assessed (A)	
E1 - Emissions - Air	Assessed (A)	
F1 - Amenity - Odour	Assessed (A)	
F2 - Amenity - Noise	Assessed (A)	
F4 - Amenity - Pests/birds and scavengers	Assessed (A)	
F3 - Amenity - Dust/fibres/particulates and litter	Assessed (A)	

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

Total number of non-compliances recorded	Total non-compliance score
0	0

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?

No action required.

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

Purpose of visit.

After some Covid 19 restrictions were lifted, it became possible for NRW to carry out routine inspections. The Celsa Meltshop has a high potential risk to the environment due to the industry involved with making steel. NRW carried out an inspection at site due a recent change with site environmental management staff as well as new activities now in place brought into permit variation V009 issued 5th May 2020. Therefore the inspection was a basic overview of site Operations to ensure sufficient resources were in place for management and to view any potential pollution from the new site activities.

Covid 19 control measures were observed throughout the visit. facemasks and gloves in addition to PPE was worn at all times. No internal meetings took place except a mandatory introduction to health and safety in the meltshop where social distancing measures were in place.

Permit condition 1.1 - General Management

Risks of pollution were seen to be minimised through the employment of knowledgeable, experienced staff brought in from the same sector. Succession training was seen to be in place. Celsa also employ a trainee environmental students to bolster their competency. A new CEMS for recording dioxin levels was reportedly in place. Early indications are that dioxin levels are approximately 25% of the permit limit. This would represent an improvement in recent years.

Permit Condition 2 - Permitted Activities

Activities seen corresponded with the permitted activities. The main meltshop process was down at the time of the visit (8am - 6pm). Maintenance work was seen to be taking place (refractory lining brickwork, strand line cleaning and realignment). New ducting work was seen to be in place. The newly permitted waste materials area was viewed. This was seen to be clean and well organised. The SUDS development was seen to be progressing. This has been delayed due to Covid 19, but should be working within the next 8 weeks. It is important to gain samples from this operation at the earliest opportunity to satisfy the requirements of the permit under Table S4.1. Site should attempt 2 monitoring samples before the end of the year despite the permit requiring a gap of 6 months. Because the first sample is likely to be taken in July/Aug, the second should be scheduled to be taken before the end of the year.

The metals recovery operation was seen. Although not operating at the time of the inspection, piles of segregated metal collections were seen. The operation is carried out within an enclosed building with limits to the operating times limited by permit V009. Any alteration to the specified times would need to be applied for as a new permit variation. This was because the ambient background noise was assessed as being too high for neighbouring receptors under variation V009. Any alteration to operating times before or after those currently operating would likely attract the need to carry out further noise abatement prior to a variation being granted.

Site are reminded that operation of the crushing/screening equipment under permit condition Schedule 1, Table S1.1, A2, is limited to 75 tonnes per day during the hours of 07.00-17.00 hrs daily. Also under Schedule 1, Table S1.1, A3 - The coating of road stone at the asphalt plant is limited to hours of 06.00-17.00 hrs daily. Storage limits also apply.

Permit condition 3.3 - Odour

Site odour was minimal. No odours were detected on site or during transfer off site during the inspection.

Permit condition 3.4 - Noise and Vibration

Minimal noise and vibration was experienced, largely due to the meltshop being offline. However, deliveries were still being received and process into bays ready for processing. Some noise from a loader and a grab was witnessed, but not at a level which would cause noise pollution offsite during the day time hours. Standard ear protection was worn with signage present.

Permit condition 3.5 - Pests

Site confirmed the recommencement of the fly spraying control measures which were introduced in 2019. This is a welcome continuance and represents Celsa's commitment to the community and the previous problem of flies. No flies were seen during the inspection.

Also, no vermin, seagulls, birds, pests, or insects were seen throughout the site during the visit. There was no excess rubbish, wind blown material, or notable invasive plant species observed. The site was relatively clean and tidy.

Next Inspection - This will be scheduled for Sept 2021 (Covid 19 measures depending)

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.