31st OCTOBER 2016

i. Overview

Liberty Steel Newport Limited (LSN) recognises that it is good practice to use all natural resources in an efficient manner with a view to achieving continuous improvement through benchmarking and in turn achieving savings through efficiency.

Large volumes of water are consumed by the process for both direct cooling of product and secondary cooling of plant and equipment hence alternative sources of process water must be considered other that the traditional use of mains water.

This plan will provide for the targeting of reductions in mains water consumption by giving consideration to alternative supplies

It will be the responsibility of the Acting Environment Manager to make available to Senior Management the water usage data and develop an annual improvement plan. This plan will be used in the annual EMS review to monitor progress.

ii. Water Usage Monitoring and Targeting

LSN is committed to the reduction of mains water usage and has already identified this as a Key Performance Indicator as part of its annual environmental review and reporting; to date the following has been achieved:

Period	**Production Tonnes**	**Consumption M3 Mains Mains/Non Potable**	**(/l/mt) Mains/Non Potable**
2010	133,887	13,726 /2,305	0.10/0.02
2011	379,133	17,936/77,012	0.05/0.20
2012	238,060	11,644/34,367	0.05/0.15
2013	54,920	17.356/0.00	0.31/-
2014	0.00	7,745/0.00	-/-
2015	56,890	9,914/0.00	0.17

For clarity mains water is the direct supply of drinking quality water supplied by Welsh Water whereas Non Potable is grey water recycled by Welsh Water (supplied via Veolia) which if not used is discharged to the River Usk.

Additional water is made up from rainwater which is collected via roof drainage systems, ground water which ingresses pits and cellars (through natural seepage and precipitation) and surface water run off.

It will be the responsibility of the Environment Manager/Acting Environment Manager to collect the following information:

- Monthly Water Invoices — Welsh Water, Veolia
- Monthly production tonnages

This information will be maintained for a period of six (6) years and be used to monitor water usage against production with a year on year target of reducing mains water per production tonne by 10 %

Ground Water/Run Off Water Management

Having committed to targeting reductions of mains water consumption, LSN recognises that not only is the discharging of collected water to outfalls a poor use of a natural resource such action also has an adverse effect on the profitability of the business.

It is therefore in the company's interest to recover and reuse this water within the process to aid in the achievement of KPI's

By operating the procedure provided in Appendix 1 all water for these points will be used efficiently

Improvement Programme

LSN is committed to constantly reviewing alternative supplies of grey water with a view to achieving environmental targets.

In this respect an improvement plan will be produced annually with a view to limiting mains water consumption to that required for drinking, cooking and sanitation.

The aspects provided in Appendix 2 have been identified as opportunities where mains water consumption could be reduced.

MSUK is committed to reviewing improvements annually with a new programme being agreed upon at year end and a reviewed plan being available prior to 28th February each year.

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APPENDIX 1

Procedure 1 **Removal of Ground Water from Site Cellars and Pits**

October 2016

Overview
Liberty Steel Newport Ltd operates to the conditions of an environmental permit issued by Natural Resources Wales and is committed to prevent all fugitive emissions resulting from the operation of its processes. Additionally it is recognised that natural resources such as water should be used considerately.

Operation of this procedure will ensure that captured water is collected and returned to the process water system thus reducing the requirement to top up systems with mains water supplies.

In no circumstances will water arising in this manner be pumped directly into site water courses

Key Areas Of Concern
Water ingress either occurring from natural seepage or from precipitation is known to collect in cellars and low lying areas of plant, the main areas being:

- Ex Rod and Bar Mill Foundations
- Weigh Bridge
- Warehouse

Responsible Persons
It will be the responsibility of the Hot Strip Mill Manager and The Works Engineer to ensure that the requirement of this procedure are implemented

Equipment
Submersible pumps
Appropriate lengths of bagging (Hose)
Where appropriate
Fork Truck
IBC's

Method
i. When a requirement to pump water arises where possible this will be removed via a submerged pump with appropriate bagging to allow discharge directly into the process water system return or to the reservoir itself.

ii. In areas where this is not currently possible water will be pumped directly into IBC's which will then be removed to the make-up water reservoir and discharged.

APPENDIX 2

LIBERTY STEEL NEWPORT LIMITED	No	WATER
	Issue	1
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	Date	31st October 2016
	Reviewed	1st January 2017

Programme No	Water 1	**Objective**	*Utilisation of resources in an efficient manner,*	
Items		**Target**	*Ensure oportunities for the reduction of mains waterare identified and addressed.*	
		Timescale	**Responsibility**	**Anticipated Impact**
1	***Loss of water through leakage*** . Introduce a formal system to identify leakage of both above and below ground water carrying pipework using both visual inspections and other methods such as but not limited to: i. Pressure testing ii.Step testing iii.CCTV Survey Proposed plan to be formulated and presented to Directors one month prior to Target date	31/03/2017	Junior Mechanical Engineer Acting Environmental Manager HSM Manager	Savings on annual water expenditure. Achievement of EMS Key Performance Indicators. The responsible use of natural resources Facilitate planned production. Reduce risk of fugitive emissions
2	Reduction in the risk of fugitive emissions to site water courses. Survey to be completed on all areas of site prone to flooding with a view to: i. Preventing water access ii. Developing a practical means of recovering water to process water reservoir.	31/03/2017	Works Engineer Acting Environmental Manager HSM Manager	Savings on annual water expenditure. Achievement of EMS Key Performance Indicators. The responsible use of natural resources Facilitate planned production.
3	Establishment of a contract with Welssh Water direclty to receive non potable water as and when required via interlinking pipework	31/12/2016	Admin Manager	Savings on annual water expenditure. Achievement of EMS Key Performance Indicators. The responsible use of natural resources

Implementation of any item recorded within this plan is subject to appropriate funds being availalbe

Approved by Director	**Date** 11/11/2016	**Signature**