LIBERTY STEEL NEWPORT LIMITED

Permit Number:	EPR/EP3830GH
Company:	Liberty Steel Newport Limited
Permit Condition:	4.2.2 (a) A report or reports on the performance of the activities over the previous year shall be submitted to Natural Resources Wales. The report shall include as a minimum: - A review of the results of the monitoring and assessment carried out in accordance with the permit including an interpretive view on data.

Overview

Of the main activities provided for within the above permit only the Hot Strip Mill (Activity Ref A1) and the associated Reheating Furnace (Activity Ref A2) were operated during the year 2017. Whilst capacity remains unchanged, activity levels were seen to increase to approximately 50% of those anticipated; throughput increasing from 125,036mt's achieved in 2016 to 208,332mt's for the year 2017.

The process continued to be operated on an 80 hours/week basis, made up of 4 x 20 hour runs from 20:00 – 16:00 Monday to Thursday. Employee numbers increased from 153 persons (Dec 16) to 184 persons (Dec 17) across the site.

Activities relating to the importing and storage of wastes (Activity Reference AR14) and the recycling and reclamation of metals and metal compounds (AR15) have been limited to the storage of RDF. Whilst the receipt of RDF was suspended in August 2016 an action plan for the disposal of RDF has subsequently been agreed with the regulator to remove all RDF from site by 1st April 2018

Of these aspects those likely to have an impact on the environment remain:

i. The Process

The purpose of the process is to convert steel slabs into Hot Rolled Coils via a 300mt/hr natural gas fired reheat furnace and six stand finishing mill. Steel slabs are typically imported across the company's private berth on the R. Usk This process remained unchanged during the reporting year albeit only operating for 27 weeks of the 48 production weeks available. Given this significant non operational period, the potential for the adverse

impact on the environment, particularly through the release of fugitive emissions, was greatly reduced.

Liberty Steel Newport Ltd (LSN) remains committed to monitoring environmental performance by recording a number of Key Performance Indicators and comparing these with previous years. (See Appendix 1) Additionally LSN has, as part of its Environmental Management System, identified certain parameters with a view to targeting reductions of 10% on the previous year (See Appendix 2) Having continued to recover from a temporary cessation in activities since production resumed in October 2015 the benefits of comparison against previous year data is limited however it is advocated that this will continue to be a useful method of benchmarking going forward.

ii. Raw Materials Handling

Raw materials are limited in the main to steel slabs which are imported directly across LSN's private berth on the R Usk. LSN operates the berth in accordance with a Port Facility Waste Management Plan, approved by the Maritime & Coastguard Agency, which makes provision for each vessel visiting the berth to advise upon wastes likely to be disposed and in turn feedback on the suitability on facilities provided.

Additionally all dunnage used in the packaging of delivered product is appropriately debarked, heat treated, and marked prior to receipt in compliance with ISPM15 standards. All stored dunnage continues to be spot checked by Forestry Commission representatives on an ad hoc basis. There have been no issues arising during the reporting year.

The potential for fugitive emissions arising in this area is limited to activities where mobile plant is utilised. LSN has now procured all mobile plant used on site and has responsibility for all subsequent testing and maintenance. Vehicles continue to be maintained to a state of operational readiness.

iii. Reheat Furnace

Stack monitoring continues to be undertaken at appropriate quarterly intervals (Permit Condition S4.1). Processes relating to emission points A1 and A2 have remained offline during the reporting year and hence no monitoring has been undertaken therefore all monitoring of emissions to air relates to emission point A5. Permit requirements remain;

Parameter	*Reporting Period*	*Limit*
Oxides of Nitrogen	3 Monthly	400 mg/m^3

LSN can report that the maximum measurements obtained during all quarterly monitoring regimes remain below 250 mg/m^3 and well within reporting parameters. These results are provided in graphic form (Appendix 3)

For the purpose of benchmarking releases to air, monitoring has been extended to include metals deemed to be appropriate to the current process. These are identified as KPI's within

the Company's EMS and are compared annually with those of the previous year (Appendix 1) with results against targeted reductions being favourable for the reporting period.

iv. Roughing Mill and Finishing Mills

VOC's may be generated as a result of transient hydraulic and lubricating oils lost to process water during scale removal (Activity Reference A11) The main area presenting a risk of oils entering the closed water system is at the 12 back up roll oil seals. A robust maintenance programme is in operation to reduce the risk of seal failure and in turn contamination of process water. The effectiveness of such a programme is monitored by measuring oil content of mill scale on an ongoing basis. Additionally oil is recovered from these closed systems and recycled for further use. The effectiveness of such a programme can be demonstrated in the oil usage levels recorded annually which again are targeted in the company's EMS (Appendix 2)

v. Cooling Section and Cooling System.

During normal operations cooling water is retained in two closed water systems each of 60,000m3 which can be operated in separation or in tandem. Losses from these systems are limited to evaporation and depending on seasonal variations can be as high as 5,000m^3 per operational day

Recognising the need to use resources efficiently LSN remains committed to establishing a reliable source of grey water. Arrangements with 'Dwr Cymru' to receive grey water directly from 'Nash' Water Treatment Complex are anticipated to be complete in Q2 18 which will negate the need to use towns' water in the process

LSN continues to operate a water treatment programme in full compliance with HSG 274 Parts 1 – 3.

vi. Surface Water

Site run off continues to be undertaken at monthly intervals by spot sampling (Permit Condition S3.2) and reported on a quarterly basis to the regulator. A twelve monthly review of results are provided in graphic form (Appendix 4) there have been no incident of reporting levels being breached in the reporting period.

Mass releases to water per kg are calculated at year end. These are identified as KPI's within the Company's EMS and are compared annually with those of the previous year (Appendix 1) targeted reductions being favourable for the reporting period.

General Waste

The potential for fugitive emissions arising from the storage of wastes on site has increased relative to the number of personnel on site and the level of activity. This is reflected in the report on annual KPI's (Appendix 1) Disposal streams are in place to manage waste in an appropriate manner. These are also reported annually via the Pollution Release and Transfer Register (PRTR) and National Atmospheric Emission Inventory (NAEI) reporting system.
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