

28 January 2016

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\2015\BV0759IC 4.1.5 Annual Returns 2015.doc

Dear Mrs Parr,

RE: Rod and Bar Mill EPR Permit BV0759IC 4.1.5 Annual Returns 2015

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 2015.

1.0 Reduce oil consumption by 3% compared with 2014 (KPI = litres)

This objective was to ensure that oil consumption at the Rod & Bar Mill is reduced by 3% during 2015 compared with 2014.

Unfortunately, CELSA did not achieve the target. A new target has been agreed and set by the RBM engineers for 2016.

2.0 Consume no greater than 364 (kWh/tonne) of gas per month

A number of energy efficiency measures were maximised in 2015, such as hot charging of billets. As a result, the RBM consumed on average 354 kWh/tonne each month, exceeding the target.

A further gas reduction target has been set for 2016.

3.0 Consume no greater than 102 kWh/tonne of electricity per month

The RBM consumed on average 104 kWh/tonne of electricity per month. During 7 of the 12 months of 2015, the target was met.

A further electricity reduction target has been set for 2016.

4.0 Reduce water consumption by 3% compared with 2014 (KPI = m³)

This objective was to reduce water consumption (m³) at the Rod & Bar Mill by 3% during 2015 compared with 2014 consumption.

The RBM did not achieve the target. A further water reduction target has been set for 2016.

5.0 Reduce general waste disposal by 3% compared with 2014 (KPI = tonnes)

The objective was to reduce the general waste disposal (tonnes) at the Rod & Bar Mill by 3% during 2015 compared with 2014 disposal.

A number of waste segregation measures were introduced, such as mixed recycling and waste awareness posters. However, CELSA did not meet the target. Environmental awareness training is to be rolled out to all CELSA employees in 2016 which will cover waste reduction and correct segregation. Additionally, cardboard balers will be introduced in 2016 to further promote this.

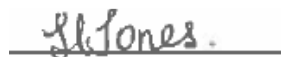
6.0 Reduce hazardous waste disposal by 3% compared with 2014 (KPI = tonnes)

The objective was to reduce that the hazardous waste disposal (tonnes) at the Rod & Bar Mill by 3% during 2015 compared with 2014 disposal.

CELSA significantly reduced the RBM hazardous waste inventory at the start of 2015, therefore, RBM did not meet the target.

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

Yours sincerely



Sara Jones
Environmental Advisor