Compliance Assessment Report

Report ID:
CAR_NRW0022661

This form will report compliance with your permit as determined by an NRW officer					
Site	Cardiff Rod & Bar Mill EPR/BV0759IC	Permit Ref	BV0759IC		
Operator/Permit holder	Celsa Manufacturing UK Ltd				
Regime	Installations				
Date of assessment	14/06/2016	Time in	10:00	Out	14:00
Assessment type	Audit				
Parts of the permit assessed	2.2.1.3, 2.2.2.4, 2.3.5, 2.3.6, 2.1.1, 2.3.8				
Lead officer's name	Richards, Gareth (Rivers House)				
Accompanied by					
Recipient's name/position	Richard Lewis/ Environment Manager	Date issued	20/06/2016		

Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations or the licence under the Water Resources Act 1991 as amended by the Water Act 2003. A detailed explanation is captured in "Compliance Assessment Report Detail" (Section 2) and any actions you may need to take are given in the "Action(s)" (section 4). This summary details where we believe any non-compliance with the permit has occurred, the relevant condition and how the non-compliance has been categorised using our Compliance Classification Scheme (CCS). CCS Scores can be consolidated or suspended where appropriate, to reflect the impact of some non-compliances more accurately. For more details of our CCS scheme, contact your local office.

Permit conditions and compliance summary	**CCS Category**	**Condition(s) breached**

KEY: See Section 5 for breach categories, suspended scores will be indicated as such.
A = Assessed or assessed in part (no evidence of non-compliance), **X** = Action only,
O = Ongoing non-compliance, not scored.

Number of breaches recorded	**0**	**Total compliance score** (see section 5 for scoring scheme)	0

If the Number of breaches recorded is greater than zero, please see Section 3 for our proposed enforcement response

Section 2 – Compliance Assessment Report Detail

This section contains a report of our findings and will usually include information on:

- The part(s) of the permit that were assessed (eg. Maintenance, training, combustion plant, etc)
- Where the type of assessment was 'Data Review' details of the report/results triggering the assessment
- Any non-compliances identified
- Any non-compliances with directly applicable legislation
- Details of any multiple non-compliances
- Information on the compliance score accrued inc.
- Details of advice given
- Any other areas of concern
- Any actions requested
- Any examples of good practice
- A reference to photos taken

The audit was arranged as part of the routine inspection schedule. Celsa were provide with an agenda beforehand.

Richard Lewis, Environment Manager was present for the duration of the audit.

Business Update

A business update was provided by Ruben Saiz Fernandez, Rod and Bar Mill Operations Manager. The Mill is currently working at full capacity and the market situation is good. Excellent progress was being made with Hot Charging, such that the average charging temperature achieved for 2016 to date was 320°C. Attention had focussed on obtaining the appropriate billet lifting equipment (magnets cannot be used above 400°C). Lifting tongs were now in use and these enabled a wide range of charging temperatures to be achieved, occasionally ~600°C (such temperatures can be achieved if charging occurs within one hour from Meltshop casting). The target temperature for 2016 is 350°C. Celsa are liaising with other European producers to share experiences.

A lot of effort had also been directed at furnace optimisation. While the average heat input for the year to date is 355KWh/t (there is a 70 – 80KWh/t saving as a result of hot charging) further improvements will be realised from the use of high emissivity paint. This will be applied during the August shutdown and is expected to result in a further 5-7% efficiency improvement. There are also plans to improve the refractory so internal conductance losses are reduced.

There are longer term plans to improve recuperator performance and ultimately achieve a heating target of <300KWh/t. This is likely to require the application of advanced furnace control technology.

Audit topics

Review of Actions from CAR BV0759IC/0208641

1. Improvements had been made to the waste storage area, these would be viewed during the site inspection.
2. Completed.
3. Completed.
4. Completed

Review of emissions monitoring reports. Reports for the periods Jan-March 2015 and Apr – June 2015 were reviewed. At the time of the first report the monitoring contractor was measuring CO, Particulate Matter and SO2, in addition to the mandatory NOx. Only the NOX was reported to NRW. For the following quarterly period the monitoring contract was changed so only NOX and CO were measured. All the data agreed with that reported to NRW. The data reported on Form W1 for January 2015 was also checked. It was noted that there had been changes to the basis of the measurements during 2015 to reflect the exact requirements of the permit. The current approach was confirmed as being correct. There was a minor transcription error for total chromium (January 2015). All the data for July 2015 was confirmed as correct,

including the reporting basis (dissolved/total).
Oil interceptor maintenance records. The last major clean was December 2014. The normal major clean frequency is annually, however, it can only be carried out during the annual shutdown and this had been postponed until August for operational reasons.
Discharges to East Bute Dock. The procedures for discharge were discussed with operational staff. The discharge valve is only opened after a series of checks have been carried out that include a visual check of water quality and a review of monitoring data. The frequency of discharge has decreased significantly. The systems in place appeared to be robust and should ensure the potential for contamination reaching the Dock is minimal.
Night shift inspection sheets. Checks are carried out every two hours during the night shift and the reporting sheets were inspected. The reporting sheets now include a comments box which as a good improvement. It was noted that on the report for 16th June 2015 there was a comment 'Top roller door in NA77 still not working'. This suggests faults may exist for a period of time. Subsequent discussion with the Deputy Ops Manager indicated that it is sometimes the case that procurement of spares takes a few days so immediate repairs are not always possible. There was no evidence that in this instance the delay had led to further noise complaints.
Complaints log. Complaints received during 2015 were reviewed. Complaints had been received in January and March. In addition Celsa had been retrospectively notified in September about previous noise issues. However, there had been no further reports since that time. Celsa had arranged for a noise assessment to be carried out and this was done on 13th April 2016. The report included abatement options, however, the cost of these was high especially considering that the likely benefit was small at ~4dB. It was important that Celsa continue to maintain a high level of vigilance in respect of the management of noise.

Site inspection

The site inspection was conducted in the presence of Richard Lewis and Clive Smith, other operational staff were involved in specific locations. The storage of water treatment chemicals adjacent to the Tempcore plant was adequate. The general waste storage area for non-hazardous materials was well managed and tidy. The hazardous waste storage area had been improved by the additional of additional hard standing. Inventories were low and being well managed. There was a separate area for empty containers. Along the west side of the Mill there is a lot of historic rubble and soil, however, fresh material was being added to this. The area needed to be managed more effectively. Along the length of the building there are personnel access doors. At least two of these had broken lower hinges so they were difficult to close. This could lead to the doors remaining open during the night. In addition there was significant damage to the external metal sheeting at the northern end of the Mill. This could also lead to additional noise ingress to the local community. **Action (1):** Celsa must ensure all access doorways and building infrastructure is appropriately maintained.

There was evidence of poor housekeeping in the area of the maintenance garage at the northern end of the site. Oil spills were evident on the ground, empty oi/grease containers were scattered rather than placed in appropriate bins, the diesel tank had several problems – the doors for the tank delivery point had been removed, there were no spill pads available and there was a persistent drip from the pipework that was being collected in a bucket. **Action (2):** General housekeeping should be improved together with maintenance standards. In contrast the workshop area within the Mill was in a good condition.

Recent data from the oil in water monitor was reviewed. This was continuing to be part of the measures in place to ensure compliance with the limits for discharge to East Bute Dock.
The scale drying area was in an acceptable condition. The scale inventory was low.

Cyfoeth Naturiol Cymru Natural Resources Wales	**EPR Compliance Assessment Report**	**Report ID: CAR_NRW0022661**

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Operator/Permit holder	Celsa Manufacturing UK Ltd	Date	14/06/2016

Section 3 – Enforcement Response

You must take immediate action to rectify any non-compliance and prevent repetition.
Non-compliance with your permit conditions constitutes an offence and can result in criminal prosecutions and/or suspension or revocation of a permit. Please read the detailed assessment in Section 2 and the steps you need to take in Section 4 below.

Section 4 – Action(s)

This section summarises the actions identified during the assessment along with the timescales for when they will need to be completed.

Criteria Ref.	**CCS Category**	**Action required/advised**	**Due Date**
See Section 1 above			

Section 5 – Compliance notes for the Operator

To ensure you correct actual or potential non-compliance we may

- Advise on corrective actions verbally or in writing
- Require you to take specific actions verbally or in writing
- Issue a notice
- Require you to review your procedures or management system
- Change some of the conditions of your permit
- Decide to undertake a full review of your permit

Any breach of a permit condition is an offence and we may take legal action against you

- We will normally provide advice and guidance to assist you to come back into compliance either after an offence is committed or where we consider that an offence is likely to be committed. This is without prejudice to any other enforcement response that we consider may be required.
- Enforcement action can include the issue of a formal caution, prosecution, the service of a notice and/or suspension or revocation of the permit.

See our Enforcement and Civil Sanctions guidance for further information

This report does not relieve the site operator of the responsibility to

- Ensure you comply with the conditions of the permit at all times and prevent pollution of the environment
- Ensure you comply with other legislative provisions which may apply

Non-compliance scores and categories

CCS category	Description	Score
C1	A non-compliance that could have a major environmental effect	60
C2	A non-compliance which could have a significant environmental effect	31
C3	A non-compliance which could have a minor environmental effect	4
C4	A non-compliance which has no potential environmental effect	0.1

Operational Risk Appraisal (Opra) - Compliance assessment findings may affect your Opra score and/or your charges. This score influences the resource we use to assess permit compliance.

Section 6 – General information

Data protection notice

The information on this form will be processed by the Natural Resources Wales (NRW) to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s). The NRW may also use and/or disclose it in connection with:

- Offering/providing you with its literature/services relating to environmental matters
- Consulting with the public, public bodies and other organisations (eg. 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 its service
- Freedom of Information Act/Environmental Regulations request

The NRW may pass it on to its agents/representatives to do these things on its behalf. You should ensure that any persons named on this form are informed of the contents of this data protection notice.

Disclosure of information

The NRW will provide a copy of this report to the public register(s). However, if you consider that any information contained in this report should not be released to the public register(s) on the grounds of commercial confidentiality, you must write to your local area office within fifteen working days of receipt of this form indicating which information it concerns and why it should not be released, giving your reasons in full.

Customer charter

What can I do if I disagree with this compliance assessment report?

If you are unable to resolve the issue with your site officer, you should firstly discuss the matter with officer's line managers using the informal appeals procedure. If you wish to raise your dispute further through our official Complaints and Commendations procedure, phone our general enquiry number 0300 065 3000 (Mon to Fri 08.00 – 18.00) and ask for the Customer Contact team or send an email to enquiries@naturalresourceswales.gov.uk. If you are still dissatisfied you can make a complaint to the Public Services Ombudsman for Wales. For advice on how to complain to the Ombudsman phone their helpline on 0845 607 0987.

Welsh Language
If you would like this form in Welsh please contact your Regulatory Officer.