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30th January 2017

Mrs E A Parr
PPC Compliance Assistant
Natural Resources Wales
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St Mellons
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CF3 0EY

Our Ref: w:\Environment Agency\Permit Reporting\Rod and Bar Mill\Returns\EA\Annual\2016\BV0759IC 4.1.5 Annual Returns 2016.doc

Dear Mrs Parr,

RE: Rod and Bar Mill EPR Permit BV0759IC 4.1.5 Annual Returns 2016

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 2016.

1.0 Reduce oil consumption by 5% compared with 2015 (KPI = litres/tonne)

This objective was to consume no more than 0.28 litres/tonne of finished product (per month) at the Rod & Bar Mill.

The Rod & Bar Mill surpassed this target by achieving 0.26 litres/tonne. Significant work to ensure any oil leaks are minimised helped to ensure a successful outcome.

A new target of 0.25 litres/tonne has been agreed and set for 2017 which equates to a 3% reduction compared with 2016 consumption.

2. 0 Consume no greater than 345 (kWh/tonne) of gas per month

A number of energy efficiency measures continued in 2016, such as hot charging of billets but unfortunately the overall gas consumption remained the same as 2015 with a consumption of 354kWh/tonne.

Aa a result a new gas consumption target of 342 kWh/tonne has been set for 2017 which equates to a 3.5% reduction compared with 2016 consumption.

3.0 Consume no greater than 103 kWh/tonne of electricity per month

The RBM consumed on average 100.06 kWh/tonne of electricity per month and therefore exceeded the target set. Electricity consumption is tracked on a daily basis and optimising it's use is a key KPI for all RBM employees.

A further electricity reduction target has been set for 2017.

4. 0 Reduce general waste (tonnes per month) by 5% compared with previous 5 years average (KPI = tonnes)

The objective was to maintain general waste tonnage to below 15 tonnes per month at the Rod & Bar Mill

The Rod & Bar Mill surpassed the target by achieving 6.4 tonnes per month. Significant improvements have been made in communication both through improved signage and in the monthly EMS meetings. Monthly walkabout actions are now recorded on Prosafety which includes any actions related to waste segregation. This has most notably increased the level of wood and mixed recycling which have been removed from the general waste stream. Similarly pre-shutdown discussions have ensured any other waste streams are appropriately segregated and not sent offsite as general waste. A better relationship, commitment and pro-active approach from the external waste management provider (Siteserv) also greatly improved the situation. Environmental awareness (EHS learning booklet) training and quarterly learning lessons were rolled out to all CELSA employees in 2016 which covered waste reduction and correct segregation (see section 6.0).

A general waste target has been set for 2017 at 6 tonnes per month which equates to a 5% reduction compared with 2016 figures.

5. 0 Improve hazardous waste management

The objective was to improve the management of the hazardous waste storage and disposal at the Rod & Bar Mill.

Significant improvements were made by increasing the concrete storage area for hazardous waste, ensuring the inventory is kept to a minimum with regular disposal collections and improving signage for segregation of various hazardous waste types. As a result it was deemed that the Rod & Bar Mill achieved the objective set and are now in a position to look to reduce the quantity of hazardous waste generated per month.

Therefore a hazardous waste target has been set for 2017 at 3.64 tonnes per month which equates to a 3% reduction compared with 2016 figures.

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6.0 Train 100% of personnel utilising the new EHS Learning Booklet (% of employees)

The objective was to roll out training to all CELSA employees on the new EHS induction booklet. The booklet covers a range of environmental topics including the use of raw materials, energy and water use, emissions to air and water, oil & grease use, waste generation, fugitive emissions and transport. The employees are then tested on their knowledge of the contents and 100% of the Rod & Bar Mill employees passed the test in 2016.

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

Yours sincerely



Richard Lewis
Environmental Manager

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