Building 58, Castle Works, East Moors Road
CARDIFF CF24 5NN
Tel: 029 2035 1800

30th January 2017

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\2016\BV0759IC 4.1.4 Annual Returns 2016.doc

Dear Mrs Parr,

RE: Rod and Bar Mill EPR Permit BV0759IC 4.1.4 Annual Returns 2016

In accordance with CELSA Manufacturing UK Ltd Environmental Permitting Regulations (EPR) Rod and Bar Mill Permit BV0759IC, permit condition 4.1.4 requires the following:

4.1.4 The Operator shall review fugitive emissions, having regard to the application of Best Available Techniques, on an annual basis, or such other period as shall be agreed in writing by the Agency, and a summary report on this review shall be sent to the Agency detailing such releases and the measures taken to reduce them within 3 months of the end of such period.

Principle sources of fugitive emissions from the Rod & Bar Mill are from:

- Roof vents located over the cooling beds, rolling mill and furnace areas, which release direct to air from within the building and contain water vapour from the cooling circuit and any dust emitted from the process activities. Process contributions to the building air are minimised through the use of LEVs and through operating procedures aimed to minimise dust.
- The two water treatment system clarifiers will also give rise to fugitive emissions, principally water vapour.

Operations that may give rise to fugitive emissions of dust to air and do not have LEVs are:

- Furnace refractory works
- Scale removal from the furnace

Both operations are undertaken within the main rolling mill building.

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Operations that may give rise to fugitive emissions to surface water, sewer and groundwater are:

- Leaks and Spills

1.0 Control of Fugitive Emissions to Air

1.1 Furnace Refractory Works

During refractory works the furnace is kept under negative pressure thus preventing the escape of dust. Replacement of refractories is only undertaken during plant shutdown periods and the waste is placed into skips. The material is large solid pieces and does not generate dusts. Ceramic fibres are dealt with under the health and safety requirements and double bagged and sealed prior to off site disposal.

The furnace refractory replacement is undertaken when the furnace is not in operation. However, the furnace extraction system is in operation during refractory repairs/replacement to provide a more comfortable working environment for the refractory engineers. The extraction applied isn't significant as it only provides fresh cool air and does not lead to any release from the process. Any dust arising settles within the furnace and is collected by vacuum when removing scale from the hearth.

Any waste which accumulates in the furnace flue-ways is periodically removed by a specialist waste contractor using a vacuum to extract the dust into closed skips for subsequent off-site disposal.

There have been no changes to these activities or any complaints received during 2016. There have been no fugitive releases to air from the permitted activities or any complaints regarding fugitive releases related to furnace refractory received during 2016.

1.2 Scale Removal from the Furnace

Scale is removed from the furnace hearth on a weekly basis, via the furnace access doors. The scale is manually scraped into purpose handling bins before being emptied into a dedicated scale skip. The scale flakes are large dense particles which are not prone to dust generation.

Scale accumulating on the floor of the furnace is removed during shutdown periods. Again, the scale flakes are large dense particles which are not prone to dust generation.

There have been no changes to these activities or any complaints received during 2016.

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2.0 Control of Fugitive Emissions to Surface Water, Sewer and Groundwater

2.1 Leaks and Spills

Surfacing

Activities that may give rise to fugitive emissions are conducted on areas with concrete hard standing.

There have been no changes to these activities or any complaints received during 2016.

Drainage and Other Sub-Surface Structures

There are no underground storage tanks on site. The other sub-surface structures on site comprises of the basement lubricating oil and oil storage areas and an underground rainwater surge tank. The cellars were constructed as part of the foundations of the process and consist of reinforced concrete, which provides an impervious layer with an average thickness of 300mm. The cellars are all constructed with floor levels below ground level and there are no drains and are significantly larger in volume than the sum of the individual tanks within them, and as such any spillage would be contained. A penstock valve has been fitted to the RBM discharge point to East Bute Dock, and is closed except for discharge under controlled conditions.

There are no other underground storage tanks on site. Surface drainage from areas of hard standing runs to the combined surface/foul sewer.

There have been no changes to these activities or any complaints received during 2016.

Secondary Containment

Containment is provided for the storage of oils and chemicals on site. Following the publishing of Water Resources (Control of Pollution) (Oil Storage) (Wales) Regulations 2016 and following best practice guidance (Pollution Prevention Guidelines: PPG 2 — Above Ground Oil Storage Tanks), all tanks, drums or other containers of more than 200 litres are inspected on a monthly basis during internal environmental audits. All fill points are within the bunded areas and bund inspections are also conducted during the monthly internal environmental audits.

In January 2011, CELSA finalised construction and commenced activity of the new Tempcore water cooling system. The associated chemical dosing and storage area was built in accordance with the Environment Agency requirements.

There have been no changes to these activities or any complaints received during 2016.

As there have been no changes to any of the above activities or any complaints received during 2016, the current controls for fugitive emissions are deemed relevant and up to date. Should you require

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any further information regarding permit condition 4.1.4 and these works please do not hesitate to contact me.

Yours sincerely



Richard Lewis
Environmental Manager

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