Cyfoeth Naturiol Cymru Natural Resources Wales

Compliance Assessment Report

Report ID: CAR_NRW0031916

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	20/07/2017	Time in	10:00	Out	14:00
Assessment type	Audit				
Parts of the permit assessed	General compliance audit				
Lead officer's name	Richards, Gareth (Rivers House)				
Accompanied by					
Recipient's name/position	Richard Lewis/Sioned Hatcher/ Environment Dept.	Date issued	24/07/2017		

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, together with Sioned Hatcher. Other Celsa staff were present for specific parts of the audit.

Business Update

A business update was provided by John Cockell, Rod and Bar Mill Operations Manager. A detailed review of the operational performance and planned improvements was provided. Electrical consumption was on target, gas consumption had been better than the target however recent maintenance issues with the tongs (used for lifting hot billet) had led to reductions in charging temperatures, so gas consumption had recently increased. Despite this the YTD average charging temperature was 338oC. This was an improvement on last year but lower than the 2017 target of 350oC. The business had approved a new recuperator and this would be installed in two stages. The civil works would be carried out during the August 2017 shutdown and the second phase where the recuperators would be switched over would either be over Christmas or during the August 2018 shutdown. The predicted saving was 10kW/t. It was noted that the existing recuperator decreases the flue gas temperature to 350oC, the new recuperator would achieve 250oC.

The furnace had been coated with high emissivity paint last year. This needed to be repeated during the shutdown. It was difficult to determine the exact benefit from this as there are many other variables that affect furnace performance, however, it is considered to be beneficial.

Rolling tonnage was 20kt down on the YTD target. However, the mill utilisation target of 84% had been exceeded, at 84.7%. The yield target was 2.95% and 2.79% was being achieved.

Overall the performance of the mill and the prospects for further improvements over the coming years was good

Review of Actions CAR Form: NRW0022661

Action (1) It was advised that the damaged access doors had been repaired but there was still further work required to the main building cladding.

Action (2) It was advised that improvements had been made in respect of general housekeeping standards in the vehicle maintenance area - this was confirmed during the site inspection.

Audit Topics

East Bute Dock discharges

Good records exist for discharges to East Bute Dock. There is a well developed procedure that was being followed. This is designed to ensure all discharges are compliant with the releases limits, especially oil in water. This is proving effective and there have not been any recent reports of oil in the dock. In addition the records have proved useful for confirming when Celsa have not been discharging.

Waste transfers

The general procedures in use for waste transfer was described. Transfers were managed by a contractor and Celsa were provided with copies of relevant paper work. Good Duty of Care procedures were being followed - Celsa had copies of the site permits for its final destination, this varied depending upon market factors. Example documentation was reviewed. It was noted that for mixed waste loads there was a waste description and coding but not necessarily a weight. This information would be provided to Celsa at a later date by SiteServ. Hazardous transfers are typically consigned as drummed waste e.g. 80 x 205l drums of oil contaminated rags/gloves as 15 02 02*.

Emissions Monitoring reports

The contractors monitoring reports for releases to air, Q4 2016 and Q1 2017, and releases to water for October /November 2016, were checked against the data reported to NRW. No discrepancies were identified. However, it was noted that the date of sampling was often the end of the month, in one instance it was at 1600h on the last day of the month. This risks that data will not be available for reporting to NRW by the deadline. **Recommendation (1):** Water samples should be taken mid month so in the event of unplanned delays, or, the need to resample, the NRW deadline can still be met.

Oil Interceptor Maintenance

The maintenance schedule for the oil interceptor was described. Weekly checks are carried out as part of the routine maintenance schedule. The annual inspection is carried out by contractors and is scheduled for 3/4 August. The previous inspection was completed on 10/11 August 2016. A copy of the report was requested. **Action (1): Celsa.** It was suggested that Celsa should seek confirmation from the contractor that no damage was identified during the internal inspection. Evidence was provided that spare mops for the oil skimmer were held in stock.

Night time inspection of access doors

Evidence was provided that all doorways were being subject to night time checks, either by security or process staff. The checks were typically being carried out and recorded three times during the night. There was no evidence that doorways were being found open. This is good evidence and the measures will help ensure local noise impact are minimised.

Site Inspection

The site inspection was conducted in the presence of Celsa Operational and Environment staff.

Operational records for the oil in water monitor were reviewed. The monitor is maintained in good condition and continues to provide a useful indication of oil levels. Historic data was reviewed and indicated that there is little variation in oil level. The hazardous waste storage area was being well maintained. the current inventory was low. It was noted that there were plans to extend the roof coverage so that rain water ingress to the storage are was reduced - this would be a good improvement. The rubble previously noted on the East But Dock boundary roadway had not yet been removed. It remained the intention to do this but there was no target completion date. The water treatment chemical storage are was acceptable. The bunds were in an acceptable condition.

The dry scale storage area was being maintained in an acceptable condition, the entrance to the contained area had been closed off using dry scale, this was to prevent the transfer of scale to the roadway. Dedicated skips for non-hazardous waste were in use for segregated waste streams, these appeared to be well managed, however, some of the roadway drains seemed to be blocked in this area. This could affect accumulation of surface water. The oil skimmer mops were working satisfactorily and being maintained in an acceptable condition.

A description of the system for ensuring emergency water was available for the reheat furnace was provided.

The area behind the Electrical Workshop was inspected. This had once been used for waste storage until it was confirmed to be outside the installation boundary. It was currently being used as a rebar stock area.

The maintenance workshop was being maintained in a good condition. The diesel store was tidy with no evidence of any on-going leakages. Oil materials were stored internally on bunds. General housekeeping was very good and much improved from that witnessed during the previous inspection.

The stores compound was inspected. The storage of liquids on dedicated racking was generally good. However, it was noted that full IBC's may be better stored at a lower level to reduce the risk of any leakage not being contained in the bunds that were at ground level. It was noted that there was an IBC in a corner of the compound that was not labelled and contained a liquid that appeared to have separated. Investigation confirmed that this was approx. ten years old and unlikely to be used. There was also other examples of greases that had been part used and stored for a long time. **Action (2):** Celsa need to dispose of materials that have been stored for a significant time and are unlikely to be used.

Recommendation (2): IBCs have finite lifetimes depending upon their specification and use.

There were multiple examples of blocked site road way surface water drains. **Action (3):** Celsa should ensure surface water drains are maintained in good repair.

A fair challenge was made by site security staff for the non use of my hard hat chin strap. This was a good example of site H&S standards being enforced.

Cyfoeth Naturiol Cymru Natural Resources Wales	**EPR Compliance Assessment Report**	**Report ID: CAR_NRW0031916**

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Operator/Permit holder	Celsa Manufacturing UK Ltd	Date	20/07/2017

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.