

Compliance Assessment Report

Report ID:
CAR_NRW0026485

This form will report compliance with your permit as determined by an NRW officer

Site	Tremorfa Melt Shop EA/EPR/TP3639BH/V002	Permit Ref	TP3639BH			
Operator/Permit holder	Celsa Manufacturing UK Ltd					
Regime	Installations					
Date of assessment	18/10/2016	Time in	N/A	Out	N/A	
Assessment type	Report/Data Review					
Parts of the permit assessed	Schedule 5 Notifications Q3 2016					
Lead officer's name	Richards, Gareth (Rivers House)					
Accompanied by						
Recipient's name/position	Richard Lewis / Sara Jones/ Environment Dept.	Date issued	18/10/2016			

Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations. 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
E1 - Emissions - Air	C3	3.1.2
	C3	3.1.2
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	C3	3.5.1 (a)

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	3	Total compliance score (see section 5 for scoring scheme)	12
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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

Celsa Manufacturing UK Ltd. have notified NRW of the following exceedances for CO and particulates, and a CEMS failure by Schedule 5 notifications for the period July to September 2016. In accordance with current policy only the first emission limit exceedance for each individual parameter and which is above the limit by the accepted uncertainty allowance (30% for particulates and 10% for CO) is scored as a non-compliance in the quarterly reporting period.

1/7/16 CEM breakdown from 0600h to 12/7/16. Unable to measure CO levels for duration of breakdown. **Cat 3 non-compliance recorded.**

1/7/16 Daily particulates 5.14 mg/m³.

4/7/16 Daily particulates 5.20 mg/m³.

8/7/16 Daily particulates 5.04 mg/m³.

9/7/16 Daily particulates 6.36 mg/m³.

10/7/16 Daily particulates 9.61mg/m³. **Cat 3 non-compliance recorded.**

11/7/16 Daily particulates 10.09 mg/m³.

12/7/16 Five 1h periods, max hourly average CO 224.6 mg/m³. **Cat 3 non-compliance recorded.**
Daily particulates 10.09 mg/m³.

14/7/16 Ten 1h periods, max hourly average CO 282.1 mg/m³.

15/7/16 Twenty 1h periods, max hourly average CO 265.6 mg/m³. Daily particulates 6.16mg/m³.

16/7/16 Nineteen 1h periods, max hourly average CO 275.5 mg/m³. Daily particulates 6.4 mg/m³.

17/7/16 Fifteen 1h periods, max hourly average CO 257.9 mg/m³. Daily particulates 5.88 mg/m³.

18/7/16 Seventeen 1h periods, max hourly average CO 270 mg/m³. Daily particulates 5.81 mg/m³.

19/7/16 Twenty one 1h periods, max hourly average 272 mg/m³. Daily particulates 5.91 mg/m³.

20/7/16 Twenty one 1h periods, max hourly average 326 mg/m³. Daily particulates 5.66 mg/m³.

21/7/16 Ten 1h periods, max hourly average 265.1 mg/m³.

22/7/16 Twenty two 1h periods, max hourly average 342.9 mg/m³.

23/7/16 Twenty 1h periods, max hourly average 324.5 mg/m³.

24/7/16 Seventeen 1h periods, max hourly average 299.5 mg/m³.

25/7/16 Nineteen 1h periods, max hourly average 367.2 mg/m³.

26/7/16 Twenty three 1h periods, max hourly average 373.3 mg/m³.

27/7/16 Twenty one 1h periods, max hourly average 385.4 mg/m³.

28/7/16 Nine 1h periods, max hourly average 388.2 mg/m³.

29/7/16 Sixteen 1h periods, max hourly average 266.7 mg/m³.

30/7/16 Eighteen 1h periods, max hourly average 281.9 mg/m³.

31/7/16 Twenty three 1h periods, max hourly average 271.2 mg/m³. Daily particulates 5.07 mg/m³.

1/8/16 Eighteen 1h periods, max hourly average 265 mg/m³.

2/8/16 Twenty 1h periods, max hourly average 273.7 mg/m³.

3/8/16 Twenty three 1h periods, max hourly average 285.7 mg/m³.

4/8/16 Twelve 1h periods, max hourly average 270.3 mg/m³.

5/8/16 Twenty three 1h periods, max hourly average 275.3 mg/m³.

6/8/16 Twenty one 1h periods, max hourly average 289.2 mg/m³.

7/8/16 Eighteen 1h periods, max hourly average 279 mg/m³.

8/8/16 Nineteen 1h periods, max hourly average 222.7 mg/m³.

9/8/16 Nineteen 1h periods, max hourly average 329.9 mg/m³.

4/9/16 Six 1h periods, max hourly average 188.9 mg/m³.

5/9/16 Three 1h periods, max hourly average 158.3 mg/m³.

6/9/16 One 1h period, max hourly average 153.8 mg/m³.

13/9/16 Three 1h periods, max hourly average 166 mg/m³.

14/9/16 Eleven 1h periods, max hourly average 188.7 mg/m³.

EPR Compliance Assessment Report

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Operator/Permit holder	Celsa Manufacturing UK Ltd	Date	18/10/2016

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.

In respect of the above non-compliance you have been issued with a warning. At present we do not intend to take further enforcement action. This does not preclude us from taking additional enforcement action if further relevant information comes to light or offences continue.

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			
E1	C3	Ensure abatement system is maintained to ensure limits are consistently met.	31/10/2016
E1	C3	Ensure abatement system is maintained such that limits are not exceeded.	31/10/2016
G1	C3	Ensure CEMS is adequately maintained and spares are available.	31/10/2016

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 reports should not be released to the public register(s) on the grounds of commercial confidentiality, you must write to your local area office within twenty 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.