

	EPR Compliance Assessment Report	Report ID: TP3639BH/0238544	
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		
Date	01/05/2015	Time in	Out
What parts of the permit were assessed	Schedule 5 Notifications for Q1 2015		
Assessment	Report/data review	EPR Activity:	Installation: X Waste Op: Water Discharge:
Recipient's name/position	Sara Jones		
Officer's name	Gareth Richards	Date issued	07/05/2015

Section 1 - Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations. A detailed explanation and any action you may need to take are given in the "Detailed Assessment of Compliance" (section 3). 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			Condition(s) breached
a) Permitted activities	1. Specified by permit	N	
b) Infrastructure	1. Engineering for prevention & control of pollution	N	
	2. Closure & decommissioning	N	
	3. Site drainage engineering (clean & foul)	N	
	4. Containment of stored materials	N	
	5. Plant and equipment	N	
c) General management	1. Staff competency/ training	N	
	2. Management system & operating procedures	N	
	3. Materials acceptance	N	
	4. Storage handling, labelling, segregation	N	
d) Incident management	1. Site security	N	
	2. Accident, emergency & incident planning	N	
e) Emissions	1. Air	C3	3.1.2
	2. Land & Groundwater	N	
	3. Surface water	N	
	4. Sewer	N	
	5. Waste	N	
f) Amenity	1. Odour	N	
	2. Noise	N	
	3. Dust/fibres/particulates	N	
	4. Pests, birds & scavengers	N	
	5. Deposits on road	N	
g) Monitoring and records, maintenance and reporting	1. Monitoring of emissions & environment	N	
	2. Records of activity, site diary, journal & events	N	
	3. Maintenance records	N	
	4. Reporting & notification	N	
h) Resource efficiency	1. Efficient use of raw materials	N	
	2. Energy	N	

KEY: C1, C2, C3, C4 = CCS breach category (* suspended scores are marked with an asterisk), A = Assessed (no evidence of non-compliance), N = Not assessed, NA = Not Applicable, O = Ongoing non-compliance – not scored

Number of breaches recorded	1	Total compliance score (see section 5 for scoring scheme)	4
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If the Total No Breaches is greater than zero, then please see Section 3 for details of 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 (e.g. 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 suspended or consolidated scores.
- details of advice given
- any other areas of concern
- all actions requested
- any examples of good practice.
- a reference to photos taken

This report should be clear, comprehensive, unambiguous and normally completed within 14 days of an assessment.

Celsa have notified NRW of the following exceedances for CO through Schedule 5 Notifications for the period January to March 2015:

05/01/15, nine one hour periods, max. Hourly average CO 183.6 mg/m³
06/01/15, one hour period, max. Hourly average CO 150.1mg/m³
07/01/15, seven one hour periods, max. Hourly average CO 176.9 mg/m³
08/01/15, two one hour periods, max. Hourly average CO 154.9 mg/m³
10/01/15, one hour period, max. Hourly average CO 183.9 mg/m³
12/01/15, five one hour periods, max. Hourly average CO 191.2 mg/m³
14/01/15, one hour period, max. Hourly average CO 186.0 mg/m³
19/01/15, three one hour periods, max. Hourly average CO 171.9 mg/m³
20/01/15, two one hour periods, max. Hourly average CO 186.6 mg/m³
21/01/15, two one hour periods, max. Hourly average CO 176.8 mg/m³
22/01/15, one hour period, max. Hourly average CO 162.8 mg/m³
27/01/15, ten one hour periods, max. Hourly average CO 191.7 mg/m³
28/01/15, ten one hour periods, max Hourly average CO 190.8 mg/m³
29/01/15, one hour period, max. Hourly average CO 168.4 mg/m³
31/01/15, one hour period, max. Hourly average CO 164.6 mg/m³

03/02/15, one hour period, max. Hourly average CO 152.4 mg/m³
04/02/15, five one hour periods, max. Hourly average CO 165.9 mg/m³
08/02/15, two one hour period, max. Hourly average CO 157.2 mg/m³
10/02/15, five one hour periods, max. Hourly average CO 172.2 mg/m³
11/02/15, four one hour periods, max. Hourly average CO 187.3 mg/m³
12/02/15, one hour period, max. Hourly average CO 153 mg/m³
13/02/15, eight one hour periods, max. Hourly average CO 179.3mg/m³
14/02/15, six one hour periods, max. Hourly average CO 191.6mg/m³
15/02/15, six one hour periods, max. Hourly average CO 218.2mg/m³
17/02/15, five one hour periods, max. Hourly average CO 163.3 mg/m³
18/02/15, ten one hour period, max. Hourly average CO 258.3 mg/m³
20/02/15, nine one hour periods, max. Hourly average CO 192.8 mg/m³
21/02/15, nine one hour periods, max. Hourly average CO 218.0 mg/m³
23/02/15, three one hour periods, max. Hourly average CO 184.7 mg/m³
24/02/15, five one hour periods, max. Hourly average CO 207.6 mg/m³
25/02/15, six one hour periods, max. Hourly average CO 215.2 mg/m³
26/02/15, three one hour periods, max. Hourly average CO 187 mg/m³
27/02/15, six one hour periods, max. Hourly average CO 182.6 mg/m³
28/02/15, eleven one hour periods, max. Hourly average CO 186.1 mg/m³

01/03/15, six one hour period, max. Hourly average CO 197.3 mg/m³
04/03/15, two one hour periods, max. Hourly average CO 158.7 mg/m³
05/03/15, two one hour periods, max. Hourly average CO 159.4mg/m³
06/03/15, four one hour periods, max. Hourly average CO 167.7 mg/m³
08/03/15, two one hour periods, max. Hourly average CO 160.8 mg/m³
11/03/15, one hour period, max. Hourly average CO 150.5 mg/m³

13/03/15, three one hour periods, max. Hourly average CO 167.3 mg/m³
14/03/15, six one hour periods, max. Hourly average CO 184.7 mg/m³
17/03/15, one hour period, max. Hourly average CO 158.5 mg/m³
18/03/15, three one hour periods, max. Hourly average CO 176.2 mg/m³
19/03/15, two one hour periods, max. Hourly average CO 161.8 mg/m³
20/03/15, thirteen one hour periods, max. Hourly average CO 181.4 mg/m³
21/03/15, eight one hour periods, max. Hourly average CO 179.8 mg/m³
22/03/15, one hour period, max. Hourly average CO 155.5 mg/m³
24/03/15, two one hour periods, max. Hourly average CO 184.4 mg/m³
26/03/15, two one hour periods, max. Hourly average CO 157.9 mg/m³

The first CO exceedance in the reporting period has been ranked as a Cat3 permit non-compliance. All other exceedances for CO during the reporting period have been consolidated in accordance with NRW policy.

A total of one Cat3 non-compliance is recorded.

Previous CAR form (TP3639BH/0222822) required Celsa to provide a report on the ongoing CO non-compliances by 31st March 2015, this was received on 24th March 2015. It completes the action. The report identified a number of Engineering and Process Control Measures that were planned to be investigated/adopted in order to reduce the frequency of CO exceedances. The proposed measures address some of the reasons that have been stated on the Schedule 5 Notifications for the CO exceedances. In Q1 of 2015 a total of thirteen different reasons were stated. This suggests there are multiple causes for the CO exceedances and at times these may be acting in combination to exacerbate the problem.

It remains important that the EAF is operated in compliance with the requirements of the permit. Regular CO exceedances were not an issue when the EAF was first commissioned. Celsa's action plan is acceptable to NRW and a report on the progress for each individual measure should be provided by 30th September 2015.

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Operator/ Permit	Celsa Manufacturing UK Ltd	Date	01/05/2015

Section 3- Enforcement Response		Only one of the boxes below should be ticked	
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.			
Other than the provision of advice and guidance, at present we do not intend to take further enforcement action in respect of the non-compliance identified above. This does not preclude us from taking enforcement action if further relevant information comes to light or advice isn't followed.			☐
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.			☒
We will now consider what enforcement action is appropriate and notify you, referencing this form.			☐

Section 4- Action(s)			
Where non-compliance has been detected and an enforcement response has been selected above, this section summarises the steps you need to take to return to compliance and also provides timescales for this to be done.			
Criteria Ref.	CCS Category	Action Required/Advised	Due Date
See Section 1 above			
E1	C3	Celsa to provide a report on the implementation of all the proposed Engineering and Process Control Measures together with an indication of their effectiveness.	30th September 2015

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 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 which 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 fulfill 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 (e.g. 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 and taking any resulting action
- preventing breaches of environmental law
- assessing customer service satisfaction and improving its service
- Freedom of Information Act/Environmental Information 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 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 the officer's line managers. 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.