

6th January 2017

Dr Gareth Richards
Pollution Prevention and Control Team
Natural Resources Wales
Rivers House
St Mellons Business Park
St Mellons
CARDIFF
CF3 0EY

Our Ref: W:\Environmental\IPPC\NRW CAR Forms\NMS\2016\Annual Permit Inspection\TP3639BH_CAR Inspection
Response – 6th January 2017

Dear Gareth,

**RE: Tremorfa Melt Shop Environmental Permit TP3639BH Inspection 7th December 2016 –
Response to actions identified in Compliance Assessment Report CAR_NRW0026740**

In accordance with EPR Compliance Assessment Report (ID: CAR_NRW0026740), please find below the response in respect to the actions identified within the report.

1.0 Compliance Assessment Report Actions

1.1 Action (1): Celsa to advise NRW as necessary re: Christmas shut down period would be from 23rd December to 8th January.

Response: The melt shop will be restarting on 8th January as planned. The summer shut down is still scheduled for 2nd to 12th August 2017. Should these dates change NRW will be notified at the earliest opportunity.

1.2 Action (2): Celsa to investigate if there is evidence of the new contractor not adhering to the required practices to ensure fugitive emissions are controlled effectively and report back to NRW. Due 6th January 2017.

Response: A meeting was held on 7th December 2016 with the new contractor (Thompson) to review their activities in relation to their contractual obligations to supply dust suppression at the mineral site. It was apparent following the meeting that Thompson had not been adhering to the previously successful procedures and/or contract and so a number of relevant actions were raised:

- Thompson contract to be amended and issued to all relevant personnel to improve understanding of the dust suppression requirements at the mineral site.
- A tractor and bowser will be active at the mineral site 12 hours per day, 7 days a week. Additional to this they will be available on site 24/7 should there be a need e.g. for any slag tipping operations.
- Thompson to introduce a shift report to record the condition of the slag lagoons at the mineral site.
- At 7.00am each day a Thompson representative (bowser driver) will meet with the Screening Supervisor to confirm which slag lagoons are going to be used each day plus any other relevant activities. This communication is fundamental to ensure that sufficient dust suppression is available and in use when required.
- Increase the size of the bowser tanker (to 9,000 litres) to allow the bowser to be suppressing for a longer period of time between re-filling for water.
- Improve the communication between the tractor driver (Thompson) and dumper drivers (Harsco) to ensure that the bowser is available to the dumper as and when required.
- Thompson and Harsco to meet on a monthly basis to review the effectiveness of the dust suppression activities.

Following the implementation of the above actions the situation has much improved both in terms of on-site communication between the relevant contractors and more importantly the availability and effectiveness of dust suppression.

1.3 Action (3): If any changes are made to the (Fugitive Dust Management) plan a revised copy must be provided to NRW.

Response: Following the actions already highlighted in section 1.2 CELSA's internal procedure (ECP 12 – Fugitive Emissions Management Procedure) has been revised. A copy of the latest revision is contained in appendix 1.

1.4 Action (4): Celsa to provide a current inventory for the scrap screenings and the current plan for transfer of this material for recovery/disposal. This to include the quantities of any individual transfers and the proposed recovery/disposal destination. Information to be provided by 6th January 2017.

Response: The current inventory for the scrap screenings is 36,489 tonnes (as of 5th January 2017). In Q4 2016 3,727.705 tonnes were sent for recovery under TFS notification GB0004 000115 – Movement 1. The notification covers 7,000 tonnes so in the coming weeks a further 3,272.295 tonnes will be sent under this notification. If this notification and recovery

activity is successful there is scope to send further material in order to reduce the stockpiled quantity.

Also in December 2016 a total of 3,123.48 tonnes were sent to landfill. Whilst every effort has been made to find other recovery outlets the inventory present on site was becoming unmanageable and so landfill has been deemed the only option, albeit a short term solution. In 2017 further work will be undertaken to source more re-use/recovery solutions to avoid the necessity to send material to a landfill.

1.5 Action (5): Celsa to advise what the active fugitive dust abatement is for slag tipping operations that occur between the hours of 1800 and 0600h. Information to be provided by 6th January 2017.

Response: As mentioned in section 1.2 above, the tractor and bowser are in operation 12 hours per day for site road dust suppression and surface water management however they remain on site 24/7 should there be a need for use for any slag tipping operations. Similarly the slag lagoon water spray system is in place 24/7 and is available for use as and when required.

I trust the above information satisfies your requirements but should you require any further information regarding any of the actions please do not hesitate to contact me.

Yours sincerely



Richard Lewis
Environmental Manager

APPENDIX 1:

ECP12 – Fugitive Emissions Management Procedure

Revision 3 – December 2016