

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

Site	Tremorfa Melt Shop	Permit Ref	TP3639BH	
Operator/Permit holder	Celsa Manufacturing UK Ltd			
Regime	Installations			
Date of assessment	10/05/2018	Time in	10:30	Out 12:00
Assessment type	Audit			
Parts of the permit assessed	1.1.1, 2.3.1, 4.1			
Lead officer's name	Richards, Gareth (Rivers House)			
Accompanied by				
Recipient's name/position	Richard Lewis/ Environment Manager	Date issued	18/05/2018	

### 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
<p><b>KEY:</b> See Section 5 for breach categories, suspended scores will be indicated as such.  <b>A</b> = Assessed or assessed in part (no evidence of non-compliance), <b>X</b> = Action only,  <b>O</b> = Ongoing non-compliance, not scored.</p>		

<b>Number of breaches recorded</b>	<b>0</b>	<b>Total compliance score</b> (see section 5 for scoring scheme)	0
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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

An audit was carried out at the Celsa Mineral Site (part of the Celsa Meltshop installation) on 10th May 2018. The Operator was provided with an agenda prior to the audit. Richard Lewis was the main site contact for the audit, other staff were also present, in particular representatives of the organisation contracted for management of the Mineral Site.

Previous CAR forms for Celsa Meltshop audits were reviewed prior to the audit. This served to identify relevant topics for the audit. There were no outstanding actions specific to the Mineral Site.

### Audit topics

#### General Site

The site boundary (Tide Fields Rd) appeared to be in reasonable condition, there was no evidence of significant slag overflow through the fencing. The wind sock was in good condition and fully functional. It was noted that Securitas are contracted to provide security services. This has resulted in a cessation of illegal vehicles on site but occasional trespassing continues.

#### Lancing Booth

Daily check sheets for the Lancing Booth were reviewed. These were being completed for each day that the booth was used and included a pre-site inspection prior to commencement of lancing. There were no issues identified on the sheets examined. All Ringlemann Shade values were zero. **Recommendation (1):** The time of the Ringlemann Shade measurement should be noted on the Daily check sheet so it is evident that it was taken during the operational period.

The Service records for the Lancing Booth were examined. This work is completed at six monthly intervals by an external contractor. The most recent service was dated 13/4/2018. Minor issues were noted that included a loose fan belt and small air leak. Any necessary remediation work is actioned through Work Orders, the most recent of these was dated 7th May 2018.

Overall there was good evidence that the equipment was being well maintained and there were good control measures in place to ensure the Lancing Booth operational standards were being maintained.

#### Waste records

Scrap screening fines were currently going to Trecatti for disposal. Copies of waste transfer notes were examined. The waste was being consigned under EWC 19 12 12. There was on going work with Aberystwyth University to identify alternative options for the fines material including possible use for landscaping. **Action (1):** If there are changes to the disposal/reuse outlet then NRW should be advised.

The larger sized grade of scrap screenings was also being consigned under 19 12 12 and was currently being moved under TFS to Ferrimet (sister company to Celsa) in Spain. This is initially transferred to Birdport for interim storage pending despatch, typically on a quarterly basis, by ship (typically 3500t loads). The material is processed in Spain to recover recyclable components such as ferrous, non-ferrous, wood and plastics. This is now a regular outlet for the scrap screenings and as a result Celsa are no longer in the position of accumulating scrap screenings at a rate which exceeds the quantities being removed from site. The current scrap screening site inventory was ~9000t.

The current slag inventory was higher than typical. Celsa produce three grades; zero to 80mm, 80 to 120mm and oversize. The commercial demand was low at present. This may necessitate changes to the marketing strategy to avoid the accumulation of an unmanageable inventory.

#### Site inspection

The weather at the time of the audit was dry with a westerly wind i.e. blowing in the direction of the estuary. There had been rain earlier in the week. The Meltshop was currently in the summer shut down so there were no on going movements of slag to the Mineral Site. Drop balling was in progress. The Lancing Booth was not in use.

Slag grading was in progress. This was not generating any observable fugitive dust. There was a water bowser in use on site that was damping the roadways. It was surprising how quickly the roadways were drying out considering that there had been rain during the previous days. This is an important activity especially, as the summer months approach, in order that the potential for fugitive dust is minimised. **Action (2): Celsa.**

Celsa had not submitted a request for lancing external to the booth for a significant time. Despite this there was not a significant

accumulation of large skulls. It therefore remained unlikely that external lancing would be necessary in the short term.

The area used for mill scale storage was in reasonable condition. Celsa were now routinely grading mill scale to improve product quality. This was despatched to a regular purchaser and the demand for the material remained high.

The area of the site that had been leased to SIMS was now cleared, apart from some concrete structures. It was noteworthy that this area had a concrete surface, although the integrity was not checked in detail.

The current inventory of scrap screenings was being well managed. There were separate piles of the fines and screenings.

Celsa advised that they are considering building their own scrap screenings recovery process on the area that was previously occupied by SIMS. This would be contained in a building approx. 50m by 30m and enable separation/recovery of the recyclable components. Outlets for these had already been identified. The project cost was estimated at greater than £1M and would effectively duplicate the Ferrimet recovery process. To aid the project Celsa were currently working with the General Manager of Ferrimet. There would need to be a variation application submitted to NRW and Celsa should request pre-application discussions as soon as the plans are finalised. **Action(3): Celsa.**

## EPR Compliance Assessment Report

**Report ID:  
CAR\_NRW0033370**

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Operator/Permit holder	Celsa Manufacturing UK Ltd	Date	10/05/2018

### 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](mailto: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.