

19th March 2015

Dr Gareth Richards
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Our Ref: W:\Environmental\IPPC\Permit TP3639BH\Improvement Programme\Consolidated Permit IP1 Fugitive Dust\Fugitive Dust_Extension Request March 15.doc

Dear Dr Richards,

RE: Tremorfa Melt Shop EPR Permit TP3639BH Improvement Programme IP1

In accordance with the Tremorfa Melt Shop Environmental Permitting (EPR) Permit TP3639BH, please find below our formal response of the Improvement Programme Reference IP1, as specified in section 1.3 '*Improvement Programme*'.

1.0 Introduction

Tremorfa Melt Shop is regulated under section 12 of the Environmental Permitting (England and Wales) Regulations 2010 (as amended) to operate an installation which carries out activities as defined within Section 2.1 A(1)(b) '*Producing, melting or refining iron or steel or any ferrous alloy, including continuous casting*'. As such the company is permitted in accordance to the terms and conditions of EPR Permit TP3639BH.

Under section 1.3 of this permit the company is required to satisfy the improvement programme conditions as stated in Table S1.3. This letter is intended to assist in satisfying improvement condition reference IP1 Abatement of Fume Releases from casting operations.

Improvement IP1 specified in Table S1.3 states:

'The Operator shall review the most appropriate method(s) for the abatement of fume releases from casting operations such that the visible release of casting fume through the caster / billet bay roof vents is minimised. The feasibility of implementing such abatement and / or techniques shall be assessed in detail to include engineering, timescales and costs. A report shall be submitted to the Environment Agency that describes the appropriate method(s), together with an implementation and commissioning schedule.'

The due date for completion of the above Improvement IP1 was agreed to be extended to **31st March 2015**.

2.0 Response to EPR Compliance Assessment Report – 13/08/2014

In response to report ID TP3639BH/0216915, please see the following comments:

- Improvement in Melt Shop dust levels – Since the above report, no further monitoring of dust levels has been undertaken. This is due to the change of personnel within CELSA's EHS department, notably the departure of Nicola Burge (EHS Manager) at the end of October and the arrival of myself (Environmental Manager) at the beginning of December 2014. Since beginning the role, I have been familiarising myself with the Melt Shop processes, ongoing measures to reduce fugitive releases and previous IC1 correspondence.
- Scrap screening – It has been noticeable by onsite personnel that this has visibly resulted in significant improvements of dust levels. However, these qualitative benefits have never been reviewed and supported with quantitative data.
- Alternative methods for reducing Robertson vent releases – Due to the unavailability of monitoring data, it is difficult to review and justify alternative methods without quantitative data to support any decisions to modify the roof extraction. As any modifications would entail significant costs, the use of monitoring data would be imperative as part of the cost benefit analysis.

3.0 Proposed Monitoring 2015

Due to the absence of monitoring data, CELSA has appointed the services of an external third party to complete the following work and collation of data:

- Bulk dust sample survey and analysis – Dust samples will be collected from various locations at the site and will be analysed to provide a dust profile. These will be compared with that of the off site monitoring at Willows Avenue.
- Workplace monitoring surveys – Static sampling of dust at various locations at the site will be completed over several months.
- Data review:
 - Bulk samples – A review of the dust profile data to determine whether the dust collected can be attributed to a particular source at the CELSA site.
 - Both the historic and proposed workplace monitoring data will be reviewed to assess any reduction in workplace dust concentrations. This will help correlate whether the improvements made on site (e.g. scrap screening) have reduced workplace dust levels.
 - Complaints data – Historic and current complaints data will be reviewed to assess whether any onsite improvements have resulted in a reduction of complaints.

- Report – A detailed interpretative report, based on the results and findings of the above work will be completed. This will comprise factual reporting of the results of the survey work undertaken, a discussion of the data review together with any subsequent conclusions.

4.0 Conclusions

Given the absence of quantitative data to support the identified improvements, the additional work above will incur significant time and financial investment to achieve the required objectives. We therefore request that IC1 is extended by **6 months to 30 September 2015** to allow CELSA time to collate the factual information and make appropriate conclusions in which to move forward.

We trust that this fulfils the requirements for the items identified in CAR 0216915.

If you require any further information or should have any further questions arising from the above, please do not hesitate to contact me.

Yours sincerely



Richard Lewis
Environmental Manager