

- 9 OCT 2015



Building 58, Castle Works, East Moors Road
CARDIFF CF24 5NN
Tel: 029 2035 1800
Fax: 029 2035 1801

9th October 2015

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\Permit TP3639BH\Improvement Programme\Consolidated Permit IP1 Fugitive Dust\Supplementary Response To Environmental Permit Improvement Condition IC1.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 and accompanying documents is intended to satisfy 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.'

Celsa submitted a formal response to NRW on 1 June 2014. However, NRW issued Compliance Assessment Report (CAR) TP3639BH/0216915 on 13 August 2014 which stated: "NRW's overall view is that further work is required before it can be considered that all practicable avenues for minimising releases to air through the Robertson vents have been evaluated and where appropriate adopted."

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

In response to report ID TP3639BH/0216915, the following work was undertaken:

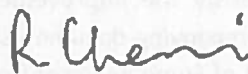
- Bulk dust sample survey and analysis – Dust samples were collected from various locations at the site and were analysed to provide a metal profile. These were then compared with that of the off site monitoring at Willows High School,
- Workplace monitoring surveys – Static sampling of dust at various locations at the site have been completed over a period of three months (May-July 2015).
- A review of the above sampling and an interpretation of the results is included in the attached report – see Appendix 1,

3.0 Conclusions

As demonstrated in the attached report, vast process improvements have been implemented since 2013 with a subsequent reduction in both dust levels and complaints received. We therefore consider that no further measures are required.

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

Yours sincerely



Richard Lewis
Environmental Manager



CELSA
MANUFACTURING UK

Building 58, Castle Works, East Moors Road
CARDIFF CF24 5NN
Tel: 029 2035 1800
Fax: 029 2035 1801

APPENDIX 1

ENVIRONMENTAL COMPLIANCE LIMITED

ECL DOCUMENT REFERENCE: P2334/R001

SUPPLEMENTARY RESPONSE TO ENVIRONMENTAL PERMIT IMPROVEMENT CONDITION IC1

