

Compliance Assessment Report

Report ID:
CAR_NRW0033723

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	02/08/2018	Time in	N/A	Out	N/A
Assessment type	Report/Data Review				
Parts of the permit assessed	1.1.1				
Lead officer's name	Richards, Gareth (Rivers House)				
Accompanied by					
Recipient's name/position	Richard Lewis/ Environment Manager	Date issued	06/08/2018		

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
B5 - Infrastructure - Plant and equipment	C3	1.1.1
C2 - General Management - Management system and operating procedures	C3	1.1.1

KEY: See Section 5 for breach categories, suspended scores will be indicated as such.

A = Assessed or assessed in part (no evidence of non-compliance), **X** = Action only,

O = Ongoing non-compliance, not scored.

Number of breaches recorded	2	Total compliance score (see section 5 for scoring scheme)	8
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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

On 9th June NRW were advised that at 1503h following a basket drop (scrap charge) in to the Electric Arc Furnace (EAF) there had been a failure of the dedusting plant. This resulted in a visible plume being released from the main stack (A1). NRW also received several reports from concerned members of the public and its own staff, including pictures and in one instance a video of the stack releases. The plume was a light orange/brown colour, typical of EAF dust, and dispersed in a north westerly direction.

Celsa took prompt action and the EAF was shut down (a process that typically takes 2 hours) in accordance with the operating procedures. This enabled an investigation to be commenced. It was quickly established that a considerable number of individual filter bags in the dedusting plant (that contains approx. 7000 individual bags) had been damaged such that dust was able to pass through the system and be released to atmosphere. While an initial assessment was able to identify the majority of bags that had been damaged a complete assessment is only possible with the additional gas flow that is created by an operating EAF. Therefore it was necessary to restart the EAF for a short period in the early hours of 10th June.

It was established that the damaged bags amounted to approx. 1000. Celsa carry spare bags but in this instance emergency replacements had to be sourced from their sister plant in Spain and direct from the manufacturer. The EAF was restarted at 1915h on 11th June. Initially the dust levels from A1 were slightly raised above the 5mg/m³ limit but over the course of the following days (during which time further filter bags were replaced as new ones became available) normal operational levels in the range 2-5 mg/m³ were consistently achieved.

Celsa are required by their permit to maintain an ambient monitor at Willows High School that measures particulates (indicative values). It is noteworthy that at no stage during the duration of this incident were PM10 levels recorded that were in excess of the Air Quality Standard. Neither was there any detectable impact upon the air quality monitor that forms part of the UK National network and is located in Cardiff City centre.

Celsa conducted an internal investigation to determine the cause of the incident and thereby avoid a repeat occurrence. In addition NRW, during the course of a routine site inspection conducted on 4th July, discussed the incident with the Meltshop Manager.

Celsa provided NRW with a copy of the Executive Summary of their incident investigation report. From this and NRW's own investigation it was apparent there were a number of factors that had contributed to the incident, these included:

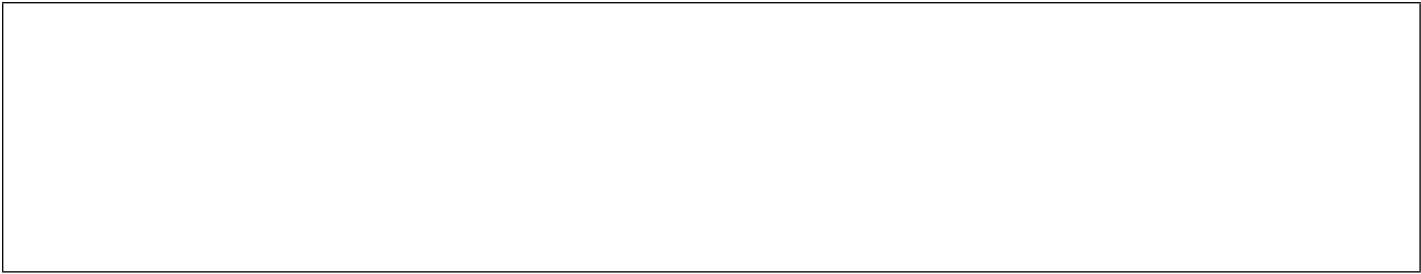
- slight overheating of the EAF melt prior to the basket drop
- use of a under loaded basket charge
- the extraction system was operating very effectively following the recent summer maintenance schedule
- emergency air damper suspected as faulty
- possible reduced efficiency of quench tower due to poor condition of water atomizing sprays (original equipment)
- wrong material going in to the scrap basket charge
- lack of communication between charge maker and furnace team leader
- management system failure that meant the risks of a scrap blend change were not fully recognised

Celsa also identified multiple actions, the majority of which have now been closed.

The incident, while not causing any significant environmental impact was highly visual, understandably concerning to local residents and represented a non-compliance with permit conditions.

Two non-compliances have been recorded as detailed in Section 1. These related to the failure to maintain key equipment in a good functional state (air damper and water atomisers) and the management system failure resulting in poor operational practices.

No non-compliances have been recorded in respect of the particulates exceedances that occurred during the incident. This is because it is NRW's policy to only score a single non-compliance for an individual emission exceedance in the reporting period. The Celsa reporting period is quarterly and there had already been a particulate exceedance recorded on 3rd June.



EPR Compliance Assessment Report

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Operator/Permit holder	Celsa Manufacturing UK Ltd	Date	02/08/2018

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.

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.

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			
C2	C3	Ensure staff are fully aware of operational procedures	31/08/2018
B5	C3	Ensure all plant and equipment is maintained in a fully functional state.	31/08/2018

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. 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.