

Compliance Assessment Report CAR_NRW0039303

Permit being assessed: BV0759IC.

For: Cardiff Rod & Bar Mill EPR/BV0759IC, held by Celsa Manufacturing UK Ltd
At: PO Box 83 Cardiff Rod & Bar Mill Castle Works , East Moors Road, Tremorfa, Cardiff, South Wales, CF24 5NN.

Type of assessment carried out: Report/Data Review, Reason: Routine.

On 31/12/2021.

Parts of permit assessed: Annual returns

NRW Lead Officer: Richard Taylor.

Report sent to: Hannah Powell, Environment Manager on 08/02/2022.

1. Summary of our findings (full details in section 4)

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
A1 - Specified by permit	Assessed (A)	

Result types are explained in more detail in the 'Important Information' section below.

Total number of non-compliances recorded	Total non-compliance score
0	0

How we use the non-compliance score to calculate your annual fee is explained in the 'Important Information' section below.

2. What action is required?

No action required.

3. What will happen next?

Any non-compliance we have identified and recorded on this form is an offence. It can result in criminal prosecution and/or suspension or revocation of your permit.

At this time, we do not intend to take any further action.

This statement does not stop us from taking additional enforcement action if further relevant information comes to light or offences continue.

4. Details of our assessment

Celsa Rod and Bar Mill

Permit BV0759IC

Date of Previous CAR form 22/12/2021

Issues Outstanding from previous CAR reports.

1. The update of the accident management plan required under pc 2.8.1 still requires sign off and adoption.
Site to confirm when this has occurred.
2. The ownership of the pipe leading under the bypass to the W1 release point needs to be established.
Please inform NRW when this is known.
3. Full structural inspection of the South clarifier tank is scheduled for May 2022. **Please update NRW of the findings.**

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WATER -

December results showed an exceedance of the hydrocarbon oil content at 66.6mg/l against a permit limit of 5mg/l. This was not released to the dock. No pollution occurred.

AIR –

Q1 – NOx limit 400mg/3 - Site recorded 268.76mg/m3 which was within permit limits.

Q2 – NOx 281.17 within the permit limit.

Q3 – NOx 173.26 within the permit limit.

Q4 – Site notified NRW that the scheduled monitoring had to be postponed due to unforeseen operational issues. The sample could not be rescheduled until the following year meaning that a sample could not be obtained for Q4. NRW accept the position where Q4 has not been able to be represented but have recommended that quarterly monitoring is scheduled earlier in the quarter so that contingency can be built into the system. This has now been implemented and is in place for Q1 2022.

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Complaints in 2021.

NRW received 5 complaints against the site in 2021. None could be substantiated. Site worked well when queried by NRW to provide answers and solutions when asked. Site received 2 NRW audits in Sept and December to ascertain the performance of the water treatment plant and acted upon the recommendations made.

5th Feb 2021 – WIRS 2101072 Noise and Odour. Could not be substantiated, site took measures to control potential sources.

8th Feb 2021 – Noise, R&B offline at time, unsubstantiated.

17th July 2021 – Noise. Could not be substantiated.

1st Sept 2021 – Possible pollution of dock, fish in distress. Oily sheen on water. Site stated there was no release to the dock Aug 1st to Sept 1st. Site Inspection by NRW occurred 21st Sept. Unsubstantiated.

14th Sept 2021 – Oil sheen pollution of Atlantic wharf photographed around Celsa release point to wharf. NRW site inspection occurred 21st Sept detailed in **CAR_NRW0038858** sent to site on 22nd Oct 2021. Recommendations and improvements have been acted on by site. Complaint unsubstantiated. Follow up

audit occurred in December 2021 detailed in CAR form **CAR_NRW0039116** sent to site in December 2021.

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Annual Returns.

Site sent forms A2, EW1, R1 and PI1 returns on time.

A2 – Site measures oxides of nitrogen. Sox, CO, and particulate matter are no longer required through permit conditions. Total NOx emission for 2021 was reported as 34.4 tonnes.

EW1 – Site uses the 2.4 multiplies for delivered electricity. CO2 from Electricity imported was reported as 21,276.

R1 – Total Hazardous waste was reported as 38.7 tonnes. Non hazardous waste was 20,241 tonnes.

PI1 – Water use per tonne of product was seen to following a decreasing trend year on year. Oil use per tonne was seen to be increasing. Site should look at the correlation between oil used in production and the rising trend of hydrocarbon oil in process water and make reductions where necessary. This would benefit the risk of oil being released to the environment as well as cut production costs.

PC4.1.5 Report – As above, the oil per tonne target figure was missed with the site almost using twice as much as the target value.

Electricity target – The site achieved the target figure with usage approximately 0.5% under target.

Gas figure, this was missed unfortunately with the result of approximately +2%.

PC4.1.4 Report – Accepted in full.

PC2.8 – Risk assessment. Some improvements have been entered from the findings of the water treatment facility audits in 2021.

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End.

If you have any queries about this report, or to discuss completion of any actions, please contact the NRW Officer named above.

Important information

Legal status of this report

Your permit is issued to you under the Environmental Permitting Regulations. You have a responsibility to comply with the conditions of your permit and prevent pollution/harm of the environment. You must also ensure that you comply with any other relevant legislation that may apply to your site's operations.

This report explains the findings of our assessment and any action you are required to take. We categorise non-compliance using our guidance for assessing non-compliance at regulated sites.

When we find potential non-compliance/s we will normally give you advice on how to maintain compliance.

To correct non-compliance, we may:

- require you to take specific actions
- issue a notice
- review the conditions of your permit.

Any advice and guidance we give will be without prejudice to any other enforcement response that we consider may be required.

Assessment results and non-compliance categories (used in section 1):

Assessment result	Description
Assessed (A)	Assessed or assessed in part, no evidence of non-compliance found
Action only (X)	Action only relating to the activity assessment
Ongoing (O)	Ongoing non-compliance, not scored

Non-compliance category	Description	Score
C1 Major	Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property	60
C2 Significant	Potential to have a significant impact or effect on the environment, people and/or property	31
C3 Minor	Potential to have a minor or minimal impact or effect on the environment, people and/or property	4
C4 No environmental impact	Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property	0.1

How we use assessment scores

The number and severity of non-compliances recorded in a year will affect your annual subsistence fee the following year. A non-compliance factor is added to your site's Operator

Performance Risk Appraisal (OPRA) score when we calculate your fee to reflect the additional resource we use to assess permit compliance.

What are suspended scores?

In line with our guidance, we may suspend scores for up to six months to allow time for remedial action to be taken. Suspended scores will be re-instated if the action is not completed.

Full list of Industry and Waste action criteria (used in section 1 and 2):**A: Permitted activities**

- A1 Specified by permit

B: Infrastructure

- B1 Infrastructure – Engineering for prevention and control of emissions
- B2 Infrastructure – Closure and decommissioning
- B3 Infrastructure – Site drainage engineering (clean and foul)
- B4 Infrastructure – Containment of stored materials
- B5 Infrastructure – Plant and equipment

C: General management

- C1 General management – Staff competency/training
- C2 General management – Management system and operating procedures
- C3 General management – Materials acceptance
- C4 General management – Storage, handling, labelling and segregation

D: Incident management

- D1 Incident management – Site security
- D2 Incident management – Accidents, emergency and incident planning

E: Emissions

- E1 Emissions – Air
- E2 Emissions – Land and groundwater
- E3 Emissions – Surface water
- E4 Emissions – Sewer
- E5 Emissions – Waste

F: Amenity

- F1 Amenity – Odour
- F2 Amenity – Noise
- F3 Amenity – Dust/fibres/particulates and litter
- F4 Amenity – Pests/birds and scavengers
- F5 Amenity – Deposits on road

G: Monitoring and records, maintenance and reporting

- G1 Monitoring and records, maintenance and reporting – Monitoring of emissions and environment
- G2 Monitoring and records, maintenance and reporting – Records of activity, site diary/journal/events
- G3 Monitoring and records, maintenance and reporting – Maintenance records
- G4 Monitoring and records, maintenance and reporting – Reporting and notification to Natural Resources Wales

H: Resources efficiency

- H1 Resource efficiency – Efficient use of raw materials
- H2 Resource efficiency – Energy efficiency

Enforcement response

Any permit condition non-compliance is an offence and we may take legal action against you. Action we take can include prosecution, serving a notice on you and/or suspension or revocation of your permit. See our Enforcement and Sanctions Guidance for further information.

Data protection notice

You should make sure that anyone named in this report knows that the information it contains will be processed by Natural Resources Wales to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s).

We may also use and/or disclose the report in connection with:

- offering or providing you with our literature or services relating to environmental matters
- consulting with the public, public bodies and other organisations (e.g. 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 our service
- Freedom of Information Act or Environmental Information Regulations requests.

We may also pass it on to our agents or representatives to do these things on our behalf.

Disclosure of information – this report will be available to view on-line

If you think this report contains commercially confidential information that should not be placed on our public register, you must contact your local Natural Resources Wales office within **fifteen working days** of receiving this report, using the contact details in the accompanying email or letter. You must give a full explanation of why it should not be added to our public register, including specifying which information is commercially confidential. We will assess your request and respond to you within 20 working days to let you know if we agree to your request.

What do I do if I disagree with the report or have a complaint?

If you disagree with this compliance assessment report, you should contact the lead officer without delay to discuss your concerns.

If you are unable to resolve the issue with the lead officer or their line manager you should contact our Customer Contact team on 0300 065 3000 (Monday to Friday 08:00 – 18:00), or email enquiries@naturalresourceswales.gov.uk for details of how to raise your dispute further through our Complaints and Commendations procedure.

If you are dissatisfied with our response, you can contact the Public Services Ombudsman for Wales by phone on 0300 7900203 or by email at ask@ombudsman.wales

Welsh Language Standards

We are committed to establishing Natural Resources Wales as a naturally bilingual organisation. We will provide compliance reports in your preferred language.