Cyfoeth Naturiol Cymru Natural Resources Wales

# Compliance Assessment Report

**Report ID: CAR_NRW0033264**

| This form will report compliance with your permit as determined by an NRW officer | | | | | |
|---|---|---|---|---|---|
| Site | Port Talbot Steel Works | Permit Ref | BL7108IM | | |
| Operator/Permit holder | Tata Steel UK Limited | | | | |
| Regime | Installations | | | | |
| Date of assessment | 31/03/2018 | Time in | N/A | Out | N/A |
| Assessment type | Check Monitoring/Sampling | | | | |
| Parts of the permit assessed | 3 Emissions and Monitoring; 4 Information | | | | |
| Lead officer's name | Cowie, Douglas | | | | |
| Accompanied by | | | | | |
| Recipient's name/position | Claire Grainger/ Environment Manager | Date issued | 07/03/2019 | | |

## 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 |
|---|---|---|
| A1 - Specified by permit | A | |
| C2 - General Management - Management system and operating procedures | A | |
| E1 - Emissions - Air | C3 | 3.1.2 Emissions to air |
| | C3 | 3.1.2 Emissions to air |
| | C3 | 3.1.2 Emissions to air |
| | C3 | 3.1.2 Emissions to air |
| | C3 | 3.1.2 Emissions to air |
| E3 - Emissions - Surface water | C3 | 3.1.2 Emissions to water |
| | C3 | 3.1.2 Emissions to water |
| G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment | A | |
| G2 - Monitoring and Records, Maintenance and Reporting - Records of activity, site diary/journal/events | A | |
| G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales | A | |

**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** | **7** | **Total compliance score** (see section 5 for scoring scheme) | 28 |
|---|---|---|---|

**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

## Site description

Tata Steel UK Ltd (Tata Steel) operates an integrated iron and steel works at Port Talbot, Neath Port Talbot. The site is permitted as an installation under the Environmental Permitting Regulations (EPR). Tata Steel has several defined industrial processes which are carried out sequentially across the installation to convert raw iron ores and coal to semi-finished (slab) and finished steel products (such as hot rolled, pickled and oiled, cold rolled and annealed steel). The permit also covers coke making and the reception, stockpiling and blending of raw iron making materials. Four other companies – Cambrian Stone, Harsco Metals, Runtech and ICL – are contracted to undertake their own permitted activities at the steelworks on Tata Steel's behalf.

## Purpose of visit/assessment

Condition 4.3.1(a) of permit BL7108IM requires the operator to inform Natural Resources Wales (NRW) in the event that the operation of the (permitted) activities gives rise to an incident or accident which significantly affects or may significantly affect the environment.

Condition 4.3.1(b) of permit BL7108IM requires the operator to inform NRW in the event of a breach of any permit condition.

Condition 4.3.2 specifies that any information provided under condition 4.3.1 where the information relates to the breach of a limit specified in the permit, shall be confirmed by sending the information listed in Schedule 5 to this permit within the time period specified in that schedule.

Schedule 5 of the permit outlines the information that the operator must provide and is divided into Part A and Part B. The schedule provides a framework/template for informing and/or notifying NRW in accordance with the requirements of condition 4.3.1.

Condition 3.1.2 requires that the limits given in Schedule 3 of the permit (point source emissions) shall not be exceeded.

The following operator notifications have been received concerning breaches/exceedances, incidents or accidents which occurred or were notified to us during **Quarter 1 2018** (1 January – 31 March):

<u>Sinter Plant</u>

1. **S5N/18/01** received on 08/01/18 – A1 Sinter Plant Main Stack
2. **S5N/18/04** received on 15/01/18 – A1 Sinter Plant Main Stack
3. **S5N/18/05** received on 15/01/18 – A2 Sinter Plant Secondary De-dust
4. **S5N/18/07** received on 22/01/18 – A1 Sinter Plant Main Stack
5. **S5N/18/08** received on 22/01/18 – A2 Sinter Plant Secondary De-dust
6. **S5N/18/10** received on 29/01/18 – A1 Sinter Plant Main Stack
7. **S5N/18/12** received on 05/02/18 – A1 Sinter Plant Main Stack
8. **S5N/18/13** received on 05/02/18 – A2 Sinter Plant Secondary De-dust

9. **S5N/18/17** received on 12/02/18 – A1 Sinter Plant Main Stack
10. **S5N/18/18** received on 12/02/18 – A2 Sinter Plant Secondary De-dust
11. **S5N/18/20** received on 19/02/18 – A1 Sinter Plant Main Stack
12. **S5N/18/21** received on 19/02/18 – A2 Sinter Plant Secondary De-dust
13. **S5N/18/23** received on 26/02/18 – A1 Sinter Plant Main Stack
14. **S5N/18/24** received on 26/02/18 – A2 Sinter Plant Secondary De-dust
15. **S5N/18/28** received on 05/03/18 – A1 Sinter Plant Main Stack
16. **UR/18/30** received on 08/03/18 – A2 Sinter Plant Secondary De-dust
17. **S5N/18/32** received on 12/03/18 – A1 Sinter Plant Main Stack
18. **S5N/18/33** received on 12/03/18 – A2 Sinter Plant Secondary De-dust
19. **S5N/18/35** received on 19/03/18 – A1 Sinter Plant Main Stack
20. **S5N/18/36** received on 19/03/18 – A2 Sinter Plant Secondary De-dust
21. **S5N/18/37** received on 26/03/18 – A1 Sinter Plant Main Stack
22. **S5N/18/38** received on 26/03/18 – A2 Sinter Plant Secondary De-dust

Ironmaking

1. **S5N/18/11** received on 30/01/18 – A4A Blast Furnace 4 bleeders
2. **UR/18/14** received on 05/02/18 – A5A Blast Furnace 5 bleeders
3. **UR/18/25** received on 05/03/18 – A4A & A5A Blast Furnace 4 & 5 bleeders

Surface waters

1. **S5N/18/03** received on 12/01/18 – W1 Long Sea Outfall
2. **S5N/18/09** received on 24/01/18 – W1 Long Sea Outfall
3. **S5N/18/15** received on 05/02/18 – W1 Long Sea Outfall
4. **S5N/18/19** received on 16/02/18 – W3 Abbey Beach Outfall
5. **S5N/18/22** received on 19/02/18 – W1 Long Sea Outfall
6. **S5N/18/27** received on 05/03/18 – W1 Long Sea Outfall
7. **S5N/18/29** received on 06/03/18 – W3 Abbey Beach Outfall
8. **S5N/18/34** received on 14/03/18 – W3 Abbey Beach Outfall

Coke Ovens

1. **UR/18/02** received on 12/01/18 – A54 Morfa Coke Oven Batteries
2. **UR/18/06** received on 31/01/18 – A54 Morfa Coke Oven Batteries
3. **UR/18/16** received on 08/02/18 – A54 Morfa Coke Oven Batteries
4. **UR/18/22** received on 01/03/18 – A54 Morfa Coke Oven Batteries
5. **UR/18/31** received on 09/03/18 – A54 Morfa Coke Oven Batteries

**Compliance assessment**

A1: SINTER PLANT MAIN STACK

**S5N/18/01**: Schedule 5 Part A received 08 January 2018 (by email)

Daily mean (average) for particulates recorded at emission point A1:

02/01/2018: 79.70mg/m3
03/01/2018: 56.68mg/m3
04/01/2018: 63.60mg/m3
05/01/2018: 46.94mg/m3
06/01/2018: 43.42mg/m3

07/01/2018: 66.09mg/m3

**A1: Sinter plant main stack**

**Permitted limit is 40.00mg/m3 as a daily mean**

The operator has specified that a measurement uncertainty factor of +/- 30% should be applied to the reported results.

**Schedule 5 Part A operator comment:**

*This is a new limit and this has been discussed at length with the NRW. Significant project work has been completed and planned ahead in order to comply with this limit and a plan will be submitted to the NRW in due course.*

*- The new £1.1M ESP control system has been installed and is operational. Significant optimisation work is now required to establish the optimum system settings for plant operations, which should improve the system's performance.*
*- New software also needs to be installed which will allow easier operation of the system.*
*- Dual fans in operation from the 02nd to 07th January*

**Schedule 5 Part B operator comment:**

*STC are analysing samples for us & have also reported very low efficiency results.*

*The plant returned to dual fan with two refurbished fans installed.*

*Internal cleaning/inspections/repairs of main stack ESP fields undertaken by OEM during major outage*

*Field's and Conveyors:*

*Sinter machine combustion analysis undertaken to understand the fuel performance of the sintering raw.*

*Control System Upgrades:*

*Sinter Plant major stop from 9th October to 18th October.*

*It was agreed that notifications would be sent with duel or single fan usage during that weekly period. This is monitored from the Sinter area and centrally*

*Planned System Optimisation:*

*Ongoing optimisation during this period in readiness of major stop in September*

We have discussed the emission limit for particulates at A1 during other compliance interventions in 2017 & 2018. NRW's findings are confirmed in the following reports:

**CAR_NRW0032992**
**CAR_NRW0032993**
**CAR_NRW0032995**
**CAR_NRW0032996**
**CAR_NRW0033787**
**CAR_NRW0034062**

NRW has agreed to accept a monthly written Schedule 5 notification from Tata in the event of continued breaches of the particulate daily mean ELV at A1.

After applying the appropriate measurement uncertainty factor, the exceedance recorded at A1 on 02/01/2018 remains non-compliant with the permit limit and Condition 3.1.2. **One CCS Category**

**3 score** has been recorded in response to this non-compliance.

We have assessed and consolidated all subsequent notified exceedances of this ELV at A1 during Quarter 1 (January – March) 2018 under a single CCS3 score for **S5N/18/01** confirmed above, in line with our Compliance Classification Scheme [CCS]. The notifications for A1 which have been consolidated during Quarter 1 are listed below:

**S5N/18/04** received on 15/01/18
**S5N/18/07** received on 22/01/18
**S5N/18/10** received on 29/01/18
**S5N/18/12** received on 05/02/18
**S5N/18/17** received on 12/02/18
**S5N/18/20** received on 19/02/18
**S5N/18/23** received on 26/02/18
**S5N/18/28** received on 05/03/18
**S5N/18/32** received on 12/03/18
**S5N/18/35** received on 19/03/18
**S5N/18/37** received on 26/03/18

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A2: SINTER PLANT SECONDARY DE-DUST

**S5N/18/05**: Schedule 5 Part A received 15 January 2018 (by email)

Daily mean (average) for particulates recorded at emission point A2:

13/01/2018: 33.89mg/m3
14/01/2018: 32.72mg/m3

**S5N/18/08**: Schedule 5 Part A received 22 January 2018 (by email)

Daily mean (average) for particulates recorded at emission point A2:

15/01/2018: 30.44mg/m3
18/01/2018: 32.74mg/m3
21/01/2018: 31.94mg/m3

**S5N/18/13**: Schedule 5 Part A received 05 February 2018 (by email)

Daily mean (average) for particulates recorded at emission point A2:

03/02/2018: 33.36mg/m3
04/02/2018: 38.66mg/m3

**S5N/18/18**: Schedule 5 Part A received 12 February 2018 (by email)

Daily mean (average) for particulates recorded at emission point A2:

09/02/2018: 31.09mg/m3
10/02/2018: 31.51mg/m3
11/02/2018: 34.53mg/m3

**A2: Sinter plant secondary de-dust**

**Permitted limit is 30.00mg/m3 as a daily mean**

The operator has specified that a measurement uncertainty factor of +/- 30% should be applied to the reported results.

**Schedule 5 Part A operator comment:**

*Current derogation expired. Extension request submitted.*

*- 1 field was in 'continuous mode' (i.e. not rapping) and was immediately changed back to rapping mode.*
*- Several blockages on the grids inside the ESP were cleared.*

**Schedule 5 Part B operator comment:**

*Current derogation expired. Extension request submitted. All readings for these weeks under 50mg/m3 (limit requested in derogation).*

After applying the appropriate measurement uncertainty factor, these exceedances remain within the permitted limit of 30.00mg/m3. No non-compliance (CCS) scores have been applied to these events.

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**S5N/18/21**: Schedule 5 Part A received 19 February 2018 (by email)

Daily mean (average) for particulates recorded at emission point A2:

13/02/2018: 55.21mg/m3
14/02/2018: 149.76mg/m3
15/02/2018: 73.65mg/m3
16/02/2018: 79.66mg/m3
17/02/2018: 111.92mg/m3
18/02/2018: 101.76mg/m3

**S5N/18/24**: Schedule 5 Part A received 26 February 2018 (by email)

Daily mean (average) for particulates recorded at emission point A2:

19/02/2018: 128.25mg/m3
20/02/2018: 115.29mg/m3
21/02/2018: 107.21mg/m3
24/02/2018: 42.64mg/m3
25/02/2018: 36.18mg/m3

**A2: Sinter plant secondary de-dust**

**Permitted limit is 30.00mg/m3 as a daily mean**

The operator has specified that a measurement uncertainty factor of +/- 30% should be applied to the reported results.

**Schedule 5 Part A operator comment:**

*Current derogation expired. Extension request submitted.*

*- 1 field was in 'continuous mode' (i.e. not rapping) and was immediately changed back to rapping mode.*
*- Several blockages on the grids inside the ESP were cleared.*
*- Monitor calibration issues – new CEM unit installed and calibrated on 22nd February.*

**Schedule 5 Part B operator comment:**

*A PCME 360 Continuous Emissions Monitor (CEM) was loaned from PCME on a temporary basis to replace a CEM unit in the Dedust Stack (A2) that had failed. It was loaned to Tata Steel Strip Products UK until a new monitor could be purchased.*
*When the new PCME 360 CEM unit was delivered the monitors were immediately swapped. On commissioning, the concentration reading hit full scale on the monitor resulting in alterations to the scaling on the monitor.*

*Tata Steel's Group Environment Department were at the Sinter Plant on the 14/02/18 to monitor Dedust ESP performance and particulate concentration. The monitoring plan was extended for further sampling to allow calibration to the EPR standard.*

*On 22/02/18 the particulate concentration results were verified and the new calibration factor was applied to the new PCME 360 unit at EPR gas conditions.*

We have discussed the emission limit for particulates at A2 during other compliance interventions in 2018. NRW's findings are confirmed in the following reports:

**CAR_NRW0032992**
**CAR_NRW0032993**
**CAR_NRW0032995**
**CAR_NRW0032996**

**NRW issued an updated version of permit BL7108IM (V016) on 26 June 2018 following Tata Steel's successful application to extend the derogation period for particulate emissions at A2.** This extended derogation took effect during Quarter 2 2018 and details are confirmed in the Annex to permit BL7108IM V016.

Up to and including 26/06/2018, NRW has agreed to accept a weekly written Schedule 5 notification from Tata in the event of continued breaches of the particulate daily mean ELV at A2. Thereafter, verified exceedances of the derogated ELV of 50.00mg/m3 should be notified in accordance with the basic permit requirements i.e. within 24 hours of detection.

Considering the information supplied by the operator under Schedule 5 of the permit, the breaches identified above between 13/02/2018 – 21/02/2018 cannot be validated due to monitor inaccuracy and/or calibration issues. No non-compliance (CCS) scores have been applied to these events. The monitoring arrangements at A2 will be scrutinised during a future compliance intervention.

We note that the particulate concentration results at A2 had been verified by the operator on 22/02/2018. After applying the appropriate measurement uncertainty factor, the exceedance recorded at A2 on 24/02/2018 (notified under **S5N/18/24**) remains non-compliant with the permit limit and Condition 3.1.2. **One CCS Category 3 score** has been recorded in response to this non-compliance.

We have assessed and consolidated all subsequent notified exceedances of this ELV at A2 during Quarter 1 (January – March) 2018 under a single CCS3 score for **S5N/18/24** confirmed above, in line with our Compliance Classification Scheme [CCS]. The notifications for A2 which have been consolidated during Quarter 1 are listed below:

**S5N/18/33** received on 12/03/18
**S5N/18/36** received on 19/03/18
**S5N/18/38** received on 26/03/18

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**UR/18/30**: Schedule 5 Part A received 08 March 2018 (by email)

Unspecified release of particulates from Sinter Plant secondary de-dust system

01/03/2018 19:00hrs – 03/03/2018 16:00hrs

**A2: Sinter plant secondary de-dust**

**Permitted limit is 30.00mg/m3 as a daily mean**

**Schedule 5 Part A operator comment:**

| SCHEDULE 5 Notification | |
|---|---|
| Part A | |
| Permit Number: | BL7108IM |
| Name of Operator: | Tata Steel UK Ltd |
| Location of Facility: | Port Talbot Works |
| Time & Date if the Detection | 02/03/18 10:00 |

| (a) Notification requirements for any activity that gives rise to an incident or accident which significantly effects or may significantly effect the environment | |
|---|---|
| | |
| Date and time of the event | 01/03/18 19:00 – 03/03/18 16:00 |
| Reference or description of the location of the event | Sinter Plant De-dusting System |
| Description of where any release into the environment took place | As Above |
| Substance(s) potentially released | Particulate Matter |
| Best estimate of the quantity or rate of release of substance(s) | Not Known |
| Measures taken, or intended to be taken, to stop the emission | Due to the failure of the compressed air supply for the dust transport system, it was necessary to stop the de-dust fan to prevent further material build up in the hoppers / conveyors and allow access to clear the blockage. The timeline below shows the actions that were taken to bring the de-dusting system back on-line:<br><br>01/03/18 19:00 – Plant restarted operation after 24 hours downtime caused by frozen air systems. The Sinter Plant had to continue operating to prevent the systems from re-freezing.<br>02/03/18 11:00 – Dust transport system now available, but unable to start De-Dust fan as there was too much material in the hoppers caused by an issue with sheering pins on the chains (therefore the chains could not remove the dust).<br>02/03/18 16:00 – The plant was stopped and the ESP chain slides were opened to allow material build up to be removed from the hoppers. A mobile vacuum was utilised to remove airborne dust along with water dust suppression whilst the system was cleared.<br>02/03/18 19:00 – The ESP hopper chains started to become available, after being vacuumed. The plant was restarted to allow the chains to clear the dust from the ESP through to the dust transport system.<br>02/03/18 21:00 – Unable to run the De-Dust fan as there was no fan bearing cooling available due to insufficient water flow caused by the pipework around the plant freezing and / or splitting.<br>03/03/18 16:00 – De-Dust fan running, but some trips occurred between 16:00 and 19:00 due to low water flow through the fan bearings. |
| Description of the failure or accident | The compressed air supply for the dust transport system froze due to the low ambient temperatures. This caused a blockage in the dust transport system which meant that the de-dust fan had to be switched off. |
| REF: UR/18/30A | |

**Schedule 5 Part B operator comment:**

*The air lines on the compressed air system for the De-dust system froze due to the extreme cold weather conditions occurring during the period. This caused issues with the conveyors taking material away from the dedust Electrostatic Precipitators (ESP).*

*The issues and actions taken to rectify are noted in the Schedule 5 Notification Part A submitted at the time. Further to this Tata Steel have implemented a Site Cold Weather Action Plan which identifies actions to be taken in the event of extreme winter conditions for each operational unit on the site.*

We recognise that freezing conditions in March 2018 were a key contributing factor to the failure of the secondary de-dust abatement system in this instance. Whilst there is no clear evidence of permit non-compliance associated with this notification, NRW is concerned about this unplanned loss of critical emissions abatement at emission point A2. This has occurred within a wider context of persistent dust fallout complaints from neighbouring residential areas, local air quality management (for PM10) and a permitted emission for which we have agreed a derogation from a Europe-wide standard (BAT-AEL).

We have discussed the general environmental performance of the sinter secondary de-dust system during a sequence of four compliance inspections in 2017 and 2018. For this specific issue, NRW believes it is now necessary to examine Tata Steel's Cold Weather Action Plan and to confirm what measures Tata Steel will take to ensure resilience and reliability of its emissions abatement systems during freezing weather conditions. This exercise will be undertaken during a future compliance visit.

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IRONMAKING

**S5N/18/11**: Schedule 5 Part A received 30 January 2018 (by email).

Release of particulates and blast furnace gas from No.4 Blast Furnace bleeder valves (emission point A4A)

29/01/2018 - multiple bleeder openings over a 24-hour period

**A4A: Blast Furnace 4 bleeders**

**No emission limit values (ELVs) apply to emissions/releases from A4A**

**Schedule 5 Part A operator comment:**

*Furnace struggling on blow in, no drive with several checks and slips. Multiple bleeder openings (29/01/2018)*

*Snort opened to reduce pressure and close bleeders*

**Schedule 5 Part B operator comment:**

*On 29th January 2018, Blast Furnace 4 was suffering with disrupted burden descent and checking practice.*

*Numerous concerns with raw material quality had resulted in a build-up of fines on the internal furnace walls resulting in low heat losses.*

*Sinter quality had declined due to issues with the waste gas fan integrity, resulting in single fan operations. This led to variable sinter quality due to uneven sintering while operating with a lower waste gas suction pressure. Recent analysis has shown that sinter HOSIM (a test developed in*

*IJmuiden to simulate Blast Furnace conditions) results have increased during the periods of lower waste gas suction pressure. This means that the sinter is more susceptible to disintegration on reduction (i.e. fines are generated during reduction in the Blast Furnace).*

*Further to this, the [redacted] iron ore pellet vessel being reclaimed at the time was of poorer quality when comparing with previous cargoes.*

*The concerns with raw material supply stated above contributed to a poor blast furnace process resulting in the bleeder openings.*

*Review of sinter plant operations when operating with single fan and negative impact on sinter quality was carried out. A standard has now been created for operating with single fan operations which includes minimum waste gas suction pressures to maintain stable sinter quality.*

*Concerns were raised with [redacted] quality with supplier and mitigate for poor quality issues as part of the Technical Collaboration between TATA Steel and [redacted]. All load port certificates are reviewed prior to accepting cargo which includes level of -5mm size fraction. All cargoes of [redacted] pellets are screened to ensure all fines are removed.*

We have discussed blast furnace operations with Tata Steel during permit compliance interventions between 2017 and 2019. NRW's findings are confirmed in the following reports:

**CAR_NRW0031694**
**CAR_NRW0032248**
**CAR_NRW0034781**

Compliance interventions are undertaken periodically by NRW to understand the root cause(s) of any notifiable blast furnace bleeder valve releases.

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**UR/18/14**: Schedule 5 Part A received 05 February 2018 (by email).

Release of particulates and blast furnace gas from No.5 Blast Furnace bleeder valves (emission point A5A)

02/02/2018 10:58hrs, 13:43hrs

**A5A: Blast Furnace 5 bleeders**

**No emission limit values (ELVs) apply to emissions/releases from A5A**

**Schedule 5 Part A operator comment:**

*Blast furnace slipped, this in turn caused pressure to travel through the furnace and out the bleeders*

*Snort opened to reduce pressure and close bleeders*

**Schedule 5 Part B operator comment:**

*On 2nd February 2018, Blast Furnace 5 was suffering with disrupted burden descent and checking practice.*

*This disruption occurred following a shutdown for down leg welding and to clear slag from the blowpipes. Following the shutdown, the furnace was blown down to 12m in an attempt to clear a build-up on the internal furnace walls which was hindering process performance. This involves partially emptying the furnace of material to allow any internally formed accretions to fall away. Numerous concerns with raw material quality had resulted in the build-up on the internal furnace walls resulting in low heat losses.*

*Sinter quality had declined due to issues with the waste gas fan integrity, resulting in single fan operations. This led to variable sinter quality due to uneven sintering while operating with a lower waste gas suction pressure. Recent analysis has shown that sinter HOSIM (a test developed in IJmuiden to simulate Blast Furnace conditions) results have increased during the periods of lower waste gas suction pressure. This means that the sinter is more susceptible to disintegration on reduction (i.e. fines are generated during reduction in the Blast Furnace).*

*Further to this, the [redacted] iron ore pellet vessel being reclaimed at the time was of poorer quality when comparing with previous cargoes.*

*Conclusions*

*Poor raw material quality at the time resulted in a build-up on furnace walls resulting in low heat losses, in particular sinter and [redacted] pellets.*

*Bleeders opened on x2 occasions during a period of checking practice.*

*Bleeder valves opened at 10:58 (semi clean only) for 15 seconds, and at 13:43 (semi clean and north) for 16 seconds.*

*Review sinter plant operations when operating with single fan and negative impact on sinter quality. Sinter Plant Technical have created a standard for operating with single fan operations which includes minimum waste gas suction pressures to maintain stable sinter quality.*

*Raise concerns with [redacted] quality with supplier and mitigate for poor quality issues. Blast Furnace Technical have raised this issue as part of the Technical Collaboration between TATA Steel and [redacted]. All load port certificates are reviewed prior to accepting cargo which includes level of -5mm size fraction. All cargoes of [redacted] pellets are screened to ensure all fines are removed.*

We have discussed blast furnace bleeder valve releases and raw material handling with Tata Steel during permit compliance interventions between 2017 and 2019. NRW's findings are confirmed in the following reports:

**CAR_NRW0031694**
**CAR_NRW0032248**
**CAR_NRW0034781**

Compliance interventions are undertaken periodically by NRW to understand the root cause(s) of any notifiable blast furnace bleeder valve releases.

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**UR/18/25**: Schedule 5 Part A received 05 March 2018 (by email).

Release of particulates and blast furnace gas from No.4 Blast Furnace bleeder valves (emission point A4A)

Release of particulates and blast furnace gas from No.5 Blast Furnace bleeder valves (emission point A5A)

28/02/2018 22:13 – 22:52hrs

**A4A: Blast Furnace 4 bleeders**
**A5A: Blast Furnace 5 bleeders**

**No emission limit values (ELVs) apply to emissions/releases from A4A & A5A**

**Schedule 5 Part A operator comment:**

*Several bleeder openings on A5A and 2 on A4A during stable process due to gas plant and*

*furnace top frozen instrument transmitters.*

*Frozen instrumentation. Further information to be submitted with Part B*

**Schedule 5 Part B operator comment:**

*During the night shift of 28th February 2018, Blast Furnace 5 (BF5) was suffering from operating in very cold weather conditions that was causing instruments to freeze up and false readings from the plant. From 22:16 to 22:52pm the furnace top pressure transmitter had frozen giving false high top pressure readings so the bleeders activated x7 times opening in their fail safe position releasing blast furnace gas to atmosphere. The North bleeder opened on x6 occasions and the South bleeder opened x1 but for the longest period of just over 60 seconds. The pressure transmitters were subsequently defrosted to return the bleeders to normal operation.*

*The furnace operators had reduced blast to minimum blowing volume in preparation to shut down before the problem was rectified. The furnace process was stable prior to the issues with the frozen pressure transmitter instrumentation. The furnace was eventually burdened for all coke to put the process into a safe state in case there were any further issues due to cold weather resulting in crashing the furnace off.*

*Conclusions*

*BF5 furnace top bleeder valves opened in failed safe operation after the high top pressure transmitters had frozen over during a period of extreme cold weather.*

*BF5 North and South bleeder valves functioned correctly by opening at the correct limits when the reading of top pressure was lost.*

*The process team leader and senior operator opened the cold blast snort valve to reduce furnace pressure and close the FT bleeder valves.*

*The Davey cone was opened in an attempt to control/relieve furnace top pressure.*

*BF5 engineering team to investigate trace heating for the high top pressure transmitters to ensure they do not freeze over*

*High top pressure transmitters and bleeder transmitters have been added to the winter preparedness plan.*

We recognise that freezing conditions in February 2018 were a key contributing factor to this instrumentation failure and associated release of furnace gases. We also recognise that the furnace bleeder valves remained functional and Tata Steel personnel took the necessary action to regulate furnace gas pressure. We are satisfied that there is no evidence of permit non-compliance associated with this notification.

Compliance interventions are undertaken periodically by NRW to understand the root cause(s) of any notifiable blast furnace bleeder valve releases. In this case, we are concerned about the unplanned loss of blast furnace instrumentation during freezing weather conditions. NRW would like to examine Tata Steel's Cold Weather Action Plan and to confirm what measures Tata Steel will take to ensure resilience and reliability of its instrumentation during freezing weather. This exercise will be undertaken during a future compliance visit and in combination with a similar assessment for the sinter plant emissions abatement systems (see **UR/18/30**).

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SURFACE WATERS

**S5N/18/03**: Schedule 5 Part A received 12 January 2018 (by email)

Weekly average for total inorganic nitrogen recorded at emission point W1:

05/11/2017 – 11/11/2017: 78.00mg/l
12/11/2017 – 18/11/2017: 68.00mg/l
19/11/2017 – 25/11/2017: 59.00mg/l

**S5N/18/09**: Schedule 5 Part A received 24 January 2018 (by email)

Weekly average for total inorganic nitrogen recorded at emission point W1:

03/12/2017 – 09/12/2017: 63.00mg/l

**W1: Long Sea Outfall**

**Permitted limit for discharge is 50.00mg/litre**

The operator has specified that the following measurement uncertainty factors for the constituent compounds of total inorganic nitrogen are associated with the reported results:

| Substance | Uncertainty (+/-) |
|---|---|
| Nitrate (NO-3) | 0.1mg/l |
| Nitrite (NO-2) | 0.05mg/l |
| Ammonia (NH3) | 0.056mg/l |

We have applied the uncertainty factor for nitrate (NO-3) to the measured results. The proportions of [ammonia to nitrite to nitrate] within the effluent generated by Tata Steel and discharged at W1 are not known. The on-site effluent treatment plant utilises biological treatment, therefore it is assumed that nitrification of ammonia has already taken place before treated effluent is discharged at W1. Therefore, we have used the compound with the widest uncertainty factor (NO-3) and which is the most likely to be present in the treated effluent because of nitrification.

As these results were obtained during the previous calendar quarter, NRW has already consolidated these notified exceedances of the total inorganic nitrogen ELV at W1 under a single CCS3 score for **S5N/17/134**. Our assessment is recorded in **CAR_NRW0032337**.

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**S5N/18/15**: Schedule 5 Part A received 05 February 2018 (by email)

Weekly average for suspended solids recorded at emission point W1:

31/12/2017 – 06/01/2018: 49.70mg/l
07/01/2018 – 02/01/2018: 45.10mg/l
14/01/2018 – 02/01/2018: 64.60mg/l
21/01/2018 – 02/01/2018: 209.00mg/l
28/01/2018 – 02/02/2018: 36.60mg/l

**S5N/18/27**: Schedule 5 Part A received 05 March 2018 (by email)

Weekly average for suspended solids recorded at emission point W1:

04/02/2018 – 10/02/2018: 26.60mg/l
11/02/2018 – 17/02/2018: 38.00mg/l
18/02/2018 – 24/02/2018: 38.00mg/l
25/02/2018 – 03/03/2018: 48.30mg/l

**W1: Long Sea Outfall**

**Permitted limit for discharge is no more than 20mg/litre above background concentration at emission point W9**

The operator has specified that a measurement uncertainty factor of +/- 1.00mg/l should be applied to the reported results.

**Schedule 5 Part A operator comment:**

*This is a new limit and this has been discussed at length with the NRW. Awaiting confirmation once NRW develops its position on emission limits for certain water pollutants.*

**NRW issued an updated version of permit BL7108IM (V016) on 26 June 2018 following Tata Steel's successful application to derogate against the precautionary application of the BAT-AEL for suspended solids at W1.** This derogation took effect during Quarter 2 2018 and details are confirmed in the Annex to permit BL7108IM V016.

Up to and including 26/06/2018, NRW has agreed to accept a monthly written Schedule 5 notification from Tata in the event of continued breaches of the suspended solids weekly average ELV at W1. Thereafter, verified exceedances of the derogated ELV of 150.00mg/l should be notified in accordance with the basic permit requirements i.e. within 24 hours of detection.

The derogated emission limit in the permit – 150mg/m3 – for suspended solids in the effluent emitted via water emission point W1 will remain for the lifetime of the plant; unless evidence emerges that an environmental benefit can be achieved by reducing the current load into the receiving water. The possible building of the Swansea bay tidal lagoon may have an impact on this. The effluent discharge at W1 will need to be re-assessed during the implementation of the next Iron and Steel BAT Reference (BRef) note.

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**S5N/18/19**: Schedule 5 Part A received 16 February 2018 (by email)

24-hour average (obtained weekly) for oil and grease recorded at emission point W3:

15/02/2018: 21.20mg/l

**W3: Abbey Beach Outfall**

**Permitted limit for discharge is 20.00mg/litre expressed as a 24-hour average from the beginning of the discharge**

The operator has not specified a measurement uncertainty factor for the reported result. Previous similar notified breaches of the oil & grease emission limit at W3 have used +/- 1.00mg/l as the factor. Therefore, NRW has assessed this breach in the same manner using +/- 1.00mg/l.

**Schedule 5 Part A operator comment:**

*Investigation currently underway.*

**Schedule 5 Part B operator comment:**

*Elevated hydrocarbons in Sump 3 coincided with elevated levels on ABO suggesting a Mills source of hydrocarbon via the Deep Drain.*

*On detection of elevated levels energy operations increased sampling frequency, until concentration came back into permitted range but this was not enough to lower the average for*

*the day to below the permit limit.*

*Incidents of elevated hydrocarbon with a suspected mills source are under investigation, as part of a wider action plan.*

After applying the appropriate measurement uncertainty factor, the exceedance recorded at W3 on 15/02/2018 remains non-compliant with the permit limit and Condition 3.1.2. **One CCS Category 3 score** has been recorded in response to this non-compliance.

We have assessed and consolidated all subsequent notified exceedances of this ELV at W3 during Quarter 1 (January – March) 2018 under a single CCS3 score for **S5N/18/19** confirmed above, in line with our Compliance Classification Scheme [CCS]. The notifications for W3 which have been consolidated during Quarter 1 are listed below:

**S5N/18/29** received on 06/03/18
**S5N/18/34** received on 14/03/18

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**S5N/18/22**: Schedule 5 Part A received 19 February 2018 (by email)

Weekly average for total inorganic nitrogen recorded at emission point W1:

31/12/2017 – 06/01/2018: 51.00mg/l
07/01/2018 – 13/01/2018: 55.00mg/l
14/01/2018 – 20/01/2018: 58.00mg/l
21/01/2018 – 27/01/2018: 69.00mg/l

**W1: Long Sea Outfall**

**Permitted limit for discharge is 50.00mg/litre**

The operator has specified that the following measurement uncertainty factors for the constituent compounds of total inorganic nitrogen are associated with the reported results:

| Substance | Uncertainty (+/-) |
|---|---|
| Nitrate (NO-3) | 0.1mg/l |
| Nitrite (NO-2) | 0.05mg/l |
| Ammonia (NH3) | 0.056mg/l |

We have applied the uncertainty factor for nitrate (NO-3) to the measured results. The proportions of [ammonia to nitrite to nitrate] within the effluent generated by Tata Steel and discharged at W1 are not known. The on-site effluent treatment plant utilises biological treatment, therefore it is assumed that nitrification of ammonia has already taken place before treated effluent is discharged at W1. Therefore, we have used the compound with the widest uncertainty factor (NO-3) and which is the most likely to be present in the treated effluent because of nitrification.

**Schedule 5 Part A operator comment:**

*To be investigated.*

**Schedule 5 Part B operator comment:**

*During the period Q4 2017 to Q1 2018, a number of Part A notifications were submitted for breaches of the weekly average ammonia, nitrite and nitrate limit at W1 Long Sea Outfall.*

*Issues around ammonia incinerator and ammonia still stability during this period led to increased*

*ammonia, nitrate and nitrite (A+N+N) concentrations in treated wastewater.*

*During the period of 31/12/2017 to 27/12/2017, there were multiple days of incinerator outage, which led to elevated A+N+N in the final treated effluent at W1.*

*The improvements made to the By-products Plant during Q4 2017 have required a period of process optimisation.*

*The stability of both the incinerators and stills has improved since the upgrade and we are now seeing improvement through less prolonged periods of elevated A+N+N at the LSO and lower average concentrations.*

*During June 2018, the Strong Liquor auto control flow valve was replaced which contributed further to improved incinerator stability.*

*Further improvements to the control and optimisation of the still and the operation of the BET plant are planned and should further reduce the incidence of A+N+N breaches.*

After applying the appropriate measurement uncertainty factor to the exceedances at W1 which occurred during Quarter 1 2018, the result on 06/01/2018 remains non-compliant with the permit limit and Condition 3.1.2. **One CCS Category 3 score** has been recorded in response to this non-compliance.

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COKE OVENS

**UR/18/02**: Schedule 5 Part A received 12 January 2018 (by email)

Monthly mean (average) Door Leakage Control Factor (DLCF) and Top Leakage Control Factor (TLCF) recorded at emission point A54:

December 2017: 89.19% (Doors)
December 2017: 95.08% (Tops)

**A54: Morfa Coke Oven Batteries**

**Permitted limit for DLCF is at least 90% of coke oven doors with no leaks as a monthly mean (BAT-AEPL percentage of visible emissions is <10%)**

**Permitted limit for TLCF is at least 99% of coke oven tops with no leaks as a monthly mean (BAT-AEPL percentage of visible emissions is <1%)**

The current DLCF and TLCF method employed by Tata and agreed with NRW is a simple binary assessment i.e. leak/no leak which does not involve grading individual emissions. The scope for error is therefore minimised and it is not necessary for the operator to specify monitoring uncertainty when reporting these parameters.

As these results were obtained during the previous calendar quarter, NRW has already consolidated these notified exceedances of the permitted limits for coke oven doors and tops emissions under 2 x CCS3 scores for **S5N/17/132**. Our assessment is recorded in **CAR_NRW0032337**.

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**UR/18/06**: Schedule 5 Part A received 31 January 2018 (by email)

Monthly mean (average) Door Leakage Control Factor (DLCF) and Top Leakage Control Factor

(TLCF) recorded at emission point A54:

October and November 2017 (Doors): approx. 2% underestimation of % compliance
October and November 2017 (Tops): approx. 2% underestimation of % compliance

**A54: Morfa Coke Oven Batteries**

**Permitted limit for DLCF is at least 90% of coke oven doors with no leaks as a monthly mean (BAT-AEPL percentage of visible emissions is <10%)**

**Permitted limit for TLCF is at least 99% of coke oven tops with no leaks as a monthly mean (BAT-AEPL percentage of visible emissions is <1%)**

The current DLCF and TLCF method employed by Tata and agreed with NRW is a simple binary assessment i.e. leak/no leak which does not involve grading individual emissions. The scope for error is therefore minimised and it is not necessary for the operator to specify monitoring uncertainty when reporting these parameters.

**Schedule 5 Part A operator comment:**

*Source of underestimate identified and corrected. Areas have been contacted who are using similar information collection to ensure data is correct. Areas are now using a more robust way of receiving and calculating data.*

**UR/18/06** corrects the DLCF and TCLF data previously supplied with notifications **UR/17/132** and **UR/17/136**. The corrected information does not affect the compliance outcome for emission limit breaches at A54 during Quarter 4 2017. Our assessment previously recorded in **CAR_NRW0032337** remains valid.

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**UR/18/16**: Schedule 5 Part A received 8 February 2018 (by email)

Monthly mean (average) Door Leakage Control Factor (DLCF) and Top Leakage Control Factor (TLCF) recorded at emission point A54:

January 2018: 89.48% (Doors)
January 2018: 95.32% (Tops)

**A54: Morfa Coke Oven Batteries**

**Permitted limit for DLCF is at least 90% of coke oven doors with no leaks as a monthly mean (BAT-AEPL percentage of visible emissions is <10%)**

**Permitted limit for TLCF is at least 99% of coke oven tops with no leaks as a monthly mean (BAT-AEPL percentage of visible emissions is <1%)**

The current DLCF and TLCF method employed by Tata and agreed with NRW is a simple binary assessment i.e. leak/no leak which does not involve grading individual emissions. The scope for error is therefore minimised and it is not necessary for the operator to specify monitoring uncertainty when reporting these parameters.

**Schedule 5 Part A operator comment:**

*This is a new limit and this has been discussed at length with the NRW. Significant project work has been completed and planned ahead in order to comply with this limit and a Part B will be submitted to the NRW.*

We have discussed the introduction of the DLCF and TLCF limits at A54 during other compliance interventions in 2018. During these interventions, relevant information that would normally be

included in a Part B was supplied by Tata. NRW's findings are confirmed in the following reports:

**CAR_NRW0032992**
**CAR_NRW0032993**
**CAR_NRW0032995**
**CAR_NRW0032996**
**CAR_NRW0033787**
**CAR_NRW0034062**

The exceedances for DLCF and TCLF recorded at A54 during January 2018 are non-compliant with the permit limits and Condition 3.1.2. **Two CCS Category 3 scores** have been recorded in response to these non-compliances.

We have assessed and consolidated all subsequent notified exceedances of these ELVs at A54 during Quarter 1 (January – March) 2018 under two CCS3 scores for **UR/18/16** confirmed above, in line with our Compliance Classification Scheme [CCS]. The notifications for A54 which have been consolidated during Quarter 1 are listed below:

**UR/18/22** received on 01/03/18 (February 2018 doors & tops)
**UR/18/44** received on 10/04/18 (March 2018 doors & tops)

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**UR/18/31**: Schedule 5 Part A received 9 March 2018 (by email)

Monthly mean (average) visible emissions from coke oven charging recorded at emission point A54:

January 2018: 32.35 seconds
February 2018: 38.00 seconds

**A54: Morfa Coke Oven Batteries**

**Permitted limit (BAT-AEPL) for coke oven charging emissions is <30 seconds visible emissions per charge expressed as a monthly mean**

Note on monitoring uncertainty: The current method for assessing visible emissions from charging employed by Tata and agreed with NRW is a modified version of the US EPA Method 303. Under Method 303, measured charging emissions are recorded to the nearest 0.5 seconds. Incomplete charges (visual interference) should be excluded from the assessment. For compliance purposes, we have rounded up the reported results to the nearest 0.5 seconds before assessing them against the BAT-AEPL (ELV).

**Schedule 5 Part A operator comment:**

*This is a new limit and this has been discussed at length with the NRW. Significant project work has been completed and planned ahead in order to comply with this limit and a Part B will be submitted to the NRW.*

We have discussed the introduction of the visible charging emission limit at A54 during other compliance interventions in 2018. During these interventions, relevant information that would normally be included in a Part B was supplied by Tata. NRW's findings are confirmed in the following reports:

**CAR_NRW0032992**
**CAR_NRW0032993**
**CAR_NRW0032995**
**CAR_NRW0032996**
**CAR_NRW0033787**

**CAR_NRW0034062**

The exceedance for visible charging emissions recorded at A54 during January 2018 is non-compliant with the permit limit and Condition 3.1.2. **One CCS Category 3 score** has been recorded in response to this non-compliance.

We have assessed and consolidated all subsequent notified exceedances of this ELV at A54 during Quarter 1 (January – March) 2018 under one CCS3 score for **UR/18/31** confirmed above, in line with our Compliance Classification Scheme [CCS]. The notifications for A54 which have been consolidated during Quarter 1 are listed below:

**UR/18/31** received on 09/03/18 (February 2018 charging)
**UR/18/44** received on 10/04/18 (March 2018 charging)

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**Summary and actions required**

Permit compliance

NRW has consolidated permit compliance scores within this calendar quarter where appropriate and in line with our Compliance Classification Scheme (CCS).

Our assessment of notifications received during Quarter 4 2017 has concluded **seven CCS Category 3 breaches** of the operator's permit conditions have occurred in response to notified exceedances of permitted emission limit values (ELVs) at the following emission points:

- A1 Sinter Plant Main Stack (particulates)
- A2 Sinter Plant Secondary De-dust (particulates)
- A54 Morfa Coke Oven Batteries (DLCF, TLCF & Charging)
- W1 Long Sea Outfall (total inorganic nitrogen)
- W3 Abbey Beach Outfall (oil and grease)

A **Warning** has been issued to the operator in response to the CCS3 breaches identified at emission points A2, W1 and W3 in this CAR form.

**NRW's enforcement response to the ongoing breaches identified at emission points A1 and A54 during 2018 is confirmed separately in CAR_NRW0033267.**

The EC Industrial Emissions Directive (IED) introduces a stricter environmental compliance regime for Tata Steel's operations at Port Talbot and reflects a wider effort to improve the environmental performance of industry across Europe. NRW has a duty to enforce these new emission limits (BAT-AELs and BAT-AEPLs) in Wales, but we remain committed to working with Tata Steel to improve the environmental performance of Port Talbot steelworks.

Derogated emission limits

NRW issued an updated version of permit BL7108IM (V016) on 26 June 2018 following Tata Steel's successful application to extend the derogation period for particulate emissions at A2. This extended derogation took effect during Quarter 2 2018 and details are confirmed in the Annex to permit BL7108IM V016.

NRW issued an updated version of permit BL7108IM (V016) on 26 June 2018 following Tata Steel's successful application to derogate against the precautionary application of the BAT-AEL for suspended solids at W1. This derogation took effect during Quarter 2 2018 and details are confirmed in the Annex to permit BL7108IM V016.

The derogated emission limit in the permit – 150mg/m3 – for suspended solids in the effluent

emitted via water emission point W1 will remain for the lifetime of the plant; unless evidence emerges that an environmental benefit can be achieved by reducing the current load into the receiving water. The possible building of the Swansea bay tidal lagoon may have an impact on this. The effluent discharge at W1 will need to be re-assessed during the implementation of the next Iron and Steel BAT Reference (BRef) note.

Notifying the regulator

For emission point A1: NRW has agreed to accept a monthly written Schedule 5 notification from Tata in the event of continued breaches of the particulate daily mean ELV.

For emission point A2: Up to and including 26/06/2018, NRW has agreed to accept a weekly written Schedule 5 notification from Tata in the event of continued breaches of the particulate daily mean ELV. Thereafter, verified exceedances of the derogated ELV at A2 should be notified in accordance with the basic permit requirements i.e. within 24 hours of detection.

For emission point W1: Up to and including 26/06/2018, NRW has agreed to accept a monthly written Schedule 5 notification from Tata in the event of continued breaches of the suspended solids weekly average ELV at W1. Thereafter, verified exceedances of the derogated ELV at W1 should be notified in accordance with the basic permit requirements i.e. within 24 hours of detection.

These notification arrangements are also reflected in **CAR_NRW0033622**.

Areas requiring further attention/action

The continuous monitoring arrangements (CEMS) for particulates at A2 will be scrutinised during a future compliance intervention.

In response to the emissions abatement and gas pressure instrument failures experienced at the sinter plant and blast furnaces in late February/early March 2018, NRW believes it is now necessary to examine Tata Steel's Cold Weather Action Plan and to confirm what measures Tata Steel will take to ensure resilience and reliability of its key systems during freezing weather conditions. This exercise will be undertaken during a future compliance visit.

Compliance interventions are undertaken periodically by NRW to understand the root cause(s) of any notifiable blast furnace bleeder valve releases.

[ENDS]

| Cyfoeth Naturiol Cymru Natural Resources Wales | **EPR Compliance Assessment Report** | **Report ID: CAR_NRW0033264** |
|---|---|---|

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

| | | | |
|---|---|---|---|
| Site | Port Talbot Steel Works | Permit Ref | BL7108IM |
| Operator/Permit holder | Tata Steel UK Limited | Date | 31/03/2018 |

## 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 | | | |
| E3 | C3 | Bring permitted operations back into compliance with ELV. IGNORE ACTION DATE - not applicable | 28/02/2019 |
| E3 | C3 | Bring permitted operations back into compliance with ELV. IGNORE ACTION DATE - not applicable | 28/02/2019 |
| E1 | C3 | Bring permitted operations back into compliance with ELV. IGNORE ACTION DATE - not applicable | 28/02/2019 |
| E1 | C3 | Bring permitted operations back into compliance with ELV. IGNORE ACTION DATE - not applicable | 28/02/2019 |
| E1 | C3 | Bring permitted operations back into compliance with ELV. IGNORE ACTION DATE - not applicable | 28/02/2019 |
| E1 | C3 | Bring permitted operations back into compliance with ELV. IGNORE ACTION DATE - not applicable | 28/02/2019 |
| E1 | C3 | Bring permitted operations back into compliance with ELV. IGNORE ACTION DATE - not applicable | 28/02/2019 |

## 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.