

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

|                                        |                                                              |               |                                         |
|----------------------------------------|--------------------------------------------------------------|---------------|-----------------------------------------|
| Site                                   | Tata Steel Port Talbot steelworks                            | Permit Ref    | BL7108IM (as amended)                   |
| Operator/ Permit holder                | Tata Steel UK Ltd                                            |               |                                         |
| Date                                   | 27 June 2014                                                 | Time in       | 09.00 Out 10.30                         |
| What parts of the permit were assessed | See below                                                    |               |                                         |
| Assessment                             | EPR - inspection                                             | EPR Activity: | Installation X Waste Op Water Discharge |
| Recipient's name/position              | Richard Leonard, Environment Manager, Tata Steel Port Talbot |               |                                         |
| Officers names                         | DMP Broom & DE Cowie                                         | Date issued   | 19 December 2014                        |

### Section 1 - Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations. A detailed explanation and any action you may need to take are given in the "Detailed Assessment of Compliance" (section 3). 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

#### Condition(s) breached

|                                                             |                                                      |   |  |
|-------------------------------------------------------------|------------------------------------------------------|---|--|
| <b>a) Permitted activities</b>                              | 1. Specified by permit                               | A |  |
| <b>b) Infrastructure</b>                                    | 1. Engineering for prevention & control of pollution | A |  |
|                                                             | 2. Closure & decommissioning                         | N |  |
|                                                             | 3. Site drainage engineering (clean & foul)          | N |  |
|                                                             | 4. Containment of stored materials                   | N |  |
|                                                             | 5. Plant and equipment                               | N |  |
| <b>c) General management</b>                                | 1. Staff competency/ training                        | N |  |
|                                                             | 2. Management system & operating procedures          | A |  |
|                                                             | 3. Materials acceptance                              | N |  |
|                                                             | 4. Storage handling, labelling, segregation          | N |  |
| <b>d) Incident management</b>                               | 1. Site security                                     | N |  |
|                                                             | 2. Accident, emergency & incident planning           | N |  |
| <b>e) Emissions</b>                                         | 1. Air                                               | N |  |
|                                                             | 2. Land & Groundwater                                | N |  |
|                                                             | 3. Surface water                                     | N |  |
|                                                             | 4. Sewer                                             | N |  |
|                                                             | 5. Waste                                             | A |  |
| <b>f) Amenity</b>                                           | 1. Odour                                             | N |  |
|                                                             | 2. Noise                                             | N |  |
|                                                             | 3. Dust/fibres/particulates                          | N |  |
|                                                             | 4. Pests, birds & scavengers                         | N |  |
|                                                             | 5. Deposits on road                                  | N |  |
| <b>g) Monitoring and records, maintenance and reporting</b> | 1. Monitoring of emissions & environment             | N |  |
|                                                             | 2. Records of activity, site diary, journal & events | N |  |
|                                                             | 3. Maintenance records                               | N |  |
|                                                             | 4. Reporting & notification                          | N |  |
| <b>h) Resource efficiency</b>                               | 1. Efficient use of raw materials                    | A |  |
|                                                             | 2. Energy                                            | N |  |

**KEY:** C1, C2, C3, C4 = CCS breach category ( \*suspended scores are marked with an asterisk),  
A = Assessed or assessed in part (no evidence of non-compliance), N = Not assessed, NA = Not Applicable

|                                    |   |                                                                     |   |
|------------------------------------|---|---------------------------------------------------------------------|---|
| <b>Number of breaches recorded</b> | 0 | <b>Total compliance score</b><br>(see section 5 for scoring scheme) | 0 |
|------------------------------------|---|---------------------------------------------------------------------|---|

**If the Total No Breaches is greater than zero, then please see Section 3 for details of 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 (e.g. 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 suspended or consolidated scores.
- details of advice given
- any other areas of concern
- all actions requested
- any examples of good practice.
- a reference to photos taken

### Site description

Tata Steel UK Ltd (Tata) 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). The steelworks has several identifiable permitted 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). The permit also covers coke making and the reception, stockpiling and blending of raw iron making materials. Two other companies, Cambrian Stone and Harsco, undertake separately-permitted slag handling and iron plating activities at the steelworks on Tata's behalf.

### Purpose of visit/assessment

To discuss waste related issues with Tata in relation to their draft waste strategy.

### Person(s) present (Office based)

Tata Steel    Richard Leonard  
                  Fiona Abbott

NRW

Mark Broom  
Doug Cowie

### Betsi management & lagoon remediation

The Betsi lagoon is used to separate iron and carbon-rich solids from residues produced by the blast furnace gas cleaning systems. The intention going forward is to use a hydro-cyclone to deal with these residues or 'reverts'. This process would also have the advantage of removing chlorides from the reverts before recycling them back into the sinter plant. Once the hydro-cyclone system is in use, Tata also want to recover the remaining iron and carbon-rich solids from the Betsi lagoon area.

There is an intermediate divider running across the lagoon. The far side of which is historic (pre-PPC) legacy material and so this material is a "contaminated land".

### Nant Llesg development

Tata have been approached about a development at Nant Llesg Surface Mine to extract around 6MT of coal between Merthyr and Tredegar using surface mining techniques and land remediation of parts of the site. Tata has considered using some of its site produced materials as infill for the Nant Llesg project. During the meeting Tata asked about the regulator's position. Providing the materials are not defined as waste, and their use does not or could not affect the environment and more specifically the groundwater that could be present in the area, then in principle Tata produced materials could be used in this project. However there may be planning constraints and other applicable legislation that may also have to be satisfied.

### BOS grit/slurry update

There is a large quantity of gritty, slurry-like material currently deposited on site north of the BOS Plant. This material is a mixture of slag, fluxes and raw materials from the steelmaking (BOS) process and is rich in recoverable metals such as iron and zinc. Tata proposes to send approximately 10,000t of this material to a plant in Norway to examine if the metal content can be recovered in a cost-effective manner. This material will be classed as waste and provided it is classified and transferred/consigned appropriately, the necessary Trans-Frontier Shipment (TFS) permissions are in place and the destination site is appropriately authorised, then NRW has no objection this proposal. [We recommend that Tata contacts the Environment Agency's TFS Regulations Team in Warrington to apply for the necessary TFS permit. Tata should also seek confirmation from the Norwegian environmental regulator that it has no objection to this scheme.](#)

### Tata and Cenin

Tata are using a process developed by Cenin Ltd to produce a concrete sub-base for the raw materials stockpiles at the stockyards using a variety of Tata sourced materials and by-products. The concrete work is currently moving down Yard 1 next to the 'dual carriageway' haul road alongside the stockyards. The concreting of the stockyards should reduce dust lift-off, improve raw materials management and reduce the water content of the ores used in the sintering process by allowing rainwater runoff to drain away more freely. [Tata should look at its ground water sampling in this area to see how concreting of the yards could affect the ground water.](#) These yards cover an area of made sand dunes and the infill is mainly steelworks slags.

Overall this work should reduce the stockyards' contribution to PM10 levels in and around Port Talbot and provide significant environmental benefits in terms of reducing fugitive emissions.

#### Other issues

An update on the water mist (dust suppression) system trial at the ferrous stock houses was provided. Tata's next step is to adjust the system's spray bars for each stock house screen over a period of 3-4 weeks. In particular it is important to understand what circumstances can lead to the spray nozzles/misters becoming blocked. During the trial there is the potential for short-term fugitive dust emissions from the stock houses. This work is noted and we thank Tata for keeping us informed of progress.

[END OF SECTION 2]

|                                                                                              |                                         |                  |                       |
|----------------------------------------------------------------------------------------------|-----------------------------------------|------------------|-----------------------|
|              | <b>EPR Compliance Assessment Report</b> | Report ID: 05637 |                       |
| <b>This form will report non-compliance with your permit as determined by an NRW officer</b> |                                         |                  |                       |
| Site                                                                                         | Tata Steel Port Talbot steelworks       | Permit           | BL7108IM (as amended) |
| Operator/ Permit                                                                             | Tata Steel UK Ltd                       | Date             | 27 June 2014          |

| Section 3- Enforcement Response                                                                                                                                                                                                                                                                                                                 |  | Only one of the boxes below should be ticked |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|----------------------------------------------|
| 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. |  |                                              |
| Other than the provision of advice and guidance, at present we do not intend to take further enforcement action in respect of the non-compliance identified above. This does not preclude us from taking enforcement action if further relevant information comes to light or advice isn't followed.                                            |  | n/a                                          |
| 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.                                                            |  | n/a                                          |
| We will now consider what enforcement action is appropriate and notify you, referencing this form.                                                                                                                                                                                                                                              |  | n/a                                          |

| Section 4- Action(s)                                                                                                                                                                                                         |              |                                                                                                                                                                                                                                                                                                                                                                                       |          |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|
| Where a non - compliance has been detected and an enforcement response has been selected above, this section summarises the steps you need to take to return to compliance and also provides timescales for this to be done. |              |                                                                                                                                                                                                                                                                                                                                                                                       |          |
| Criteria Ref.                                                                                                                                                                                                                | CCS Category | Action Required/Advised                                                                                                                                                                                                                                                                                                                                                               | Due Date |
| See Section 1 above                                                                                                                                                                                                          |              |                                                                                                                                                                                                                                                                                                                                                                                       |          |
| N/A                                                                                                                                                                                                                          |              | <b>Recommendation 1:</b> With regard to its proposal send BOS grit material to Norway to examine if the metal content can be recovered, Tata should contact the Environment Agency's TFS Regulations Team in Warrington to apply for the necessary TFS permit. Tata should also seek confirmation from the Norwegian environmental regulator that it has no objection to this scheme. | N/A      |
| N/A                                                                                                                                                                                                                          |              | <b>Recommendation 2:</b> Tata should look at its ground water sampling in the stockyards area to see how concreting of the yards could affect the ground water.                                                                                                                                                                                                                       | N/A      |

## 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 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 which could have a <b>major</b> environmental effect       | 60    |
| C2           | A non-compliance which could have a <b>significant</b> environmental effect | 31    |
| C3           | A non-compliance which could have a <b>minor</b> environmental effect       | 4     |
| C4           | A non-compliance which has <b>no</b> 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 Natural Resources Wales (NRW) to fulfill its regulatory and monitoring functions and to maintain the relevant public register(s). 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 (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 and taking any resulting action
- preventing breaches of environmental law
- assessing customer service satisfaction and improving its service
- Freedom of Information Act/Environmental Information Regulations request.

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

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 twenty 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 the officer's line managers. 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](mailto: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) 601 0987**.