

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	6 March 2015	Time in	09.30 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	Jason Heatman, Lead Environmental Engineer, Tata Steel Port Talbot		
Officers names	DMP Broom & DE Cowie	Date issued	19 May 2015

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

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

Number of breaches recorded	0	Total compliance score (see section 5 for scoring scheme)	0
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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 review the operator's plans for fugitive release monitoring at Morfa Coke Ovens to replace Doors, Tops, MEFs and PEFs.

Person(s) present (Office based)

Tata Steel Jason Heatman Georgina Brooks Ian Goffon Andrew Townsend Charlotte Barlow	NRW Mark Broom Doug Cowie
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Fugitive release monitoring

There are four British Coke Research Association (BCRA) methods in use: Door Leakage Control Factors (DLCF – Doors), Top Leakage Control Factors (TLCF – Tops), Mass Emission Factors (MEFS – Charging) and Pushing Emissions Factors (PEFs – Pushing). The US EPA Method 303 is a single document that covers the equivalent of the first three BCRA methods but not pushing releases. The published BAT conclusions (BATc) for coke, sinter, iron and steel making have performance measures for Doors, Tops and Charging – see CAR 5820. The table below confirms the main methods of DLCF monitoring identified in the BATc.

Tata Port Talbot are running both methods side by side. Although Tata's door (DLCF) assessments using BCRA are showing results in the high 99%, the corresponding leak/no leak assessments are showing up to 20% leaking doors a day. Based on the current results, Morfa Coke Ovens can comply with an interim limit of 20% leaking doors until March 2016 when the permitted limit will drop to 10% leaking doors as a monthly mean value.

		BCRA	US EPA/DMT	Dutch method	Tata PT
Doors	Frequency	Every door every 3 months	Every door every day	Every door every day	Every door every day
	Assessment method	4 grades of leak/No leak	Leak/ no leak	3 grades of leak/No leak	Leak/ no leak
	Assessment factors	0, 1, 2, 3, 4	Binary (0 or 1)	0, 1, 5, 10	Binary (0 or 1)
	Output	Percentage dimensionless number based on grade and factors	Percentage leaking doors	Percentage based on factors for grade of leak (summed product of factor*number of ovens leaking at that grade divided by the total number of ovens times 100)	Percentage leaking doors
	Ease of assessment	Complex assessment, complex output	Simple assessment, simple output	Simple assessment, not a simple output	Simple assessment, simple output
	BATc 46 comparison	No simple conversion	Direct comparison	Direct comparison?	Direct comparison
	BAT AEL 5 -10% mm		Daily mean	Short ovens daily mean, tall ovens monthly mean	Daily mean and/or monthly mean

Method	Total number of doors	Grade of door leak					Percentage of leaking doors (BATc)	Door leakage percentage from BCRA	BCRA calculated leakage result
		0	1	2	3	4			
BCRA	216	203	10	2	1	0	6.0	7.9	99.3
	216	215	1				0.5	0.5	99.96
	216	215		1			0.5	0.9	99.92
	216	215			1		0.5	1.4	99.88
	216	215				1	0.5	1.9	99.84
	216	209	2	4	1		3.2	6.0	99.48

Method	Total number of doors	Grade of door leak				Percentage of leaking doors (BATc)	Dutch door leakage percentage
		0	1	2	3		
Dutch	216	209	2	4	1	3.2	14.8
	216	215	1			0.5	0.5
	216	215		1		0.5	2.3
	216	215			1	0.5	4.6
	216	203	10	2	1	6.0	13.9

The two tables above compare the DLCF results from the BCRA and Dutch assessment methods. Tata could look back over their BCRA results to see how many doors have been scored with a 'no leak' BCRA score (Grade 0). Although this data is not yet available, NRW is content with Tata's approach and method comparisons being adopted at Port Talbot. The current operating procedures in particular demonstrated good use of photographic examples of leaking ovens. A further initiative in terms of door leakage is the cleaning and maintenance of door frames, for which a weekly audit/check methodology is being developed. Also, around 40 door frames will be replaced during the working life of the ovens.

Tata have also been looking at their tops (TLCF) scores. Their results are showing a leakage rate of less than 10% and they need to comply with a 1% leakage a rate by March 2016. Meeting this limit by March 2016 looks challenging. There is no Dutch comparison method available.

Tata will also assess their charging (MEF) releases using US EPA Method 303 to show compliance with the relevant BAT conclusions.

For pushing (PEF) releases, there is a BAT-AEL for the coke side arrestment system (Ministerstein) - <20 mg/m³ (discontinuous monitoring) which negates the need to regularly assess and report the PEF assessments.

Conclusions and further actions required

Based on their results to date, the DLCF leakage rate of 10% and the TLCF leakage rate of 1% will be challenging limits for Tata to achieve at Morfa Coke Ovens by March 2016. The simpler leak/no leak assessment type does reduce the element of subjectivity of grading the door leakage, whilst also complying with the published BAT conclusions limits. Tata should continue to develop its new method to demonstrate BATc compliance going forward, whilst also maintaining the BCRA fugitive emissions monitoring and reporting required by the current (non IED) permit.

Control of fugitive releases from tops and doors are an important control method for Polycyclic Aromatic Hydrocarbons (PAHs) such as Benzo[a]pyrene (BaP). The UK has reported a modelled breach of the European target value for BaP for the last few years. Reducing the frequency of door leaks will go some way to reducing the releases of BaP which in turn should reduce the ambient levels of this pollutant.

[END OF SECTION 2]

	EPR Compliance Assessment Report	Report ID: 05848
This form will report non-compliance with your permit as determined by an NRW officer		
Site	Tata Steel Port Talbot steelworks	Permit
Operator/ Permit	Tata Steel UK Ltd	Date
		BL7108IM (as amended) 19 May 2015

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	n/a	n/a	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 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 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. 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**.