

**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	11 February 2015		Time in	15.00	Out	16.30
What parts of the permit were assessed	C2 Operating Techniques – Coke Ovens					
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	DE Cowie, J Walters		Date issued	02 April 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**

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	N	
	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	N	
	3. Materials acceptance	A	
	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	N	
<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	A	
	2. Records of activity, site diary, journal & events	N	
	3. Maintenance records	N	
	4. Reporting & notification	A	
<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> (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

Tata Steel has been considering the potential use of an oil-based coal density enhancer at Morfa Coke Ovens, Port Talbot. Tata would like to undertake a trial to assess the effectiveness of this density enhancer and any impact its use may have on environmental emissions from the coke ovens.

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

<b>Tata Steel</b>	Jason Heatman	<b>NRW</b>	Jeremy Walters
	Andrew Townsend		Doug Cowie

### Coal density enhancement in coke ovens

Recovered fuel oil (RFO) has historically been used as a bulking agent or density enhancer in coke ovens. The addition of a relatively small amount of RFO to a coke oven allows an increase in charge weight and an associated increase in productivity. The use of RFO as part of the coking process would be subject to the current Environmental Permitting Regulations (EPR) regime for permitted installations. If the RFO is classed as a waste, the requirements of Chapter IV and Annex VI of the European Commission (EC) Industrial Emissions Directive (IED) also apply in addition to those of the EPR.


RFO is no longer a waste if it complies with the requirements of the Quality Protocol for Processed Fuel Oil (referred to as processed fuel oil) or if it separately satisfies the End-of-Waste tests laid out in the EC Waste Framework Directive; in either instance its use would not have to comply with Chapter IV and Annex VI of the IED. The End of Waste test assesses whether:

- the waste has been converted into a distinct and marketable product
- the processed substance can be used in exactly the same way as a non-waste
- the processed substance can be stored and used with no worse environmental effects when compared to the material it is intended to replace

The Environment Agency has developed a self-assessment 'IsItWaste' tool which allows operators to work out if a waste derived material has achieved end of waste. Tata has undertaken an assessment using the IsItWaste tool for recovered oil arising from its site operations at Port Talbot steelworks. The results were discussed during this intervention and it was concluded that recovered site-arising oil could meet end of waste status.

Natural Resources Wales (NRW) is content to allow Tata to commence a trial to assess the effectiveness of the recovered site-arising oil as a coke oven density enhancer, allow comparison with use of fuel oil for the same purpose and to determine if the recovered oil can be used with no worse environmental effects when compared to using a non-waste oil. The operator must agree the duration of the trial and the monitoring that will be carried out to show the validity of the trial with the site officers. The current permitted emission limit values for Morfa Coke Ovens will remain in place throughout the trial; any breach of these limits must be notified to NRW in the normal manner. The operator must notify NRW once the trial is complete and submit the trial results to us for our consideration and comment.

[END OF SECTION 2]

	<b>EPR Compliance Assessment Report</b>	Report ID:
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**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			
G1	N/A	ACTION 1: The operator must agree the duration of the trial and the monitoring that will be carried out during the trial to show its validity with the site officers.	As soon as possible
G4	N/A	ACTION 2: The operator must notify NRW once the trial is complete and submit the trial results to us for our consideration and comment.	To be confirmed following completion of Action 1

## 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**.