

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	23 June 2015	Time in	09.30 Out 11.30
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	13 July 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	A	
	2. Closure & decommissioning	N	
	3. Site drainage engineering (clean & foul)	N	
	4. Containment of stored materials	N	
	5. Plant and equipment	N	
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	N	
	2. Land & Groundwater	N	
	3. Surface water	N	
	4. Sewer	N	
	5. Waste	A	
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	N	
	2. Records of activity, site diary, journal & events	N	
	3. Maintenance records	N	
	4. Reporting & notification	N	
h) Resource efficiency	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

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

A review of Tata Steel's steelworks waste strategy was conducted during this visit. The specific issue of end of life conveyor belts was also discussed.

Person(s) present (Office based)

Tata Steel	Richard Leonard	NRW	Mark Broom
	Mark Sexton		Doug Cowie
	Fiona Abbott		

Waste strategy update

Tata Steel has developed a waste strategy to deal with current waste arisings in a sustainable manner and then to address a backlog of legacy iron bearing materials that currently cannot be used/recycled within the steelworks. One of the main problems Tata has encountered is due to the zinc content of the steel (BOS) sludges and dusts which limits their re-use in the iron making processes. Tata's plan to deal with these materials is essentially two pronged: to minimise the amount of incoming zinc (galvanised) scrap added to the steel making process; and then to maximise the amount of low-zinc material they can recycle back to the iron making processes. Tata has been diverting galvanised scrap from Port Talbot to the company's arc furnace in Rotherham, South Yorks. This furnace can handle high-zinc material but it does cost more to produce steel when galvanised scrap is used. This approach has reduced the zinc levels in the Port Talbot BOS solids from 5% to around 1% zinc. At 1% zinc Tata can use most of the current arisings on site, primarily at the sinter plant.

To use the remaining arisings they need to produce briquettes. The briquetting plant is due to restart shortly to recycle the excess BOS material that cannot be used in the sinter plant. If the plant is restarted, Tata should be aware of the requirements of [BAT 11](#) (Diffuse dust emissions) that will apply. It is understood that the structure housing the briquetting machines and equipment is owned by and is the responsibility of Tata Steel UK Ltd but operated by Harsco. Any defects in the structure e.g. missing wall and roof cladding sheets need repairs to comply with BAT11 and minimise diffuse dust emissions from the process.

To deal with the backlog, Tata is looking at using an arc furnace to produce a refined iron stream from the steel (BOS) solids stockpile on a 'campaign' basis. Although more costly in terms of operational costs, this approach does not require major capital investment. Tata could therefore have two choices: a rotary hearth furnace (big capital costs but lower operational costs) vs an arc furnace (low capital costs and higher operational costs). Tata will also have to take into consideration how it will deal with scrap arisings from its own plants and scrap imports from external customers in the future.

The other waste materials that are causing a problem are the blast furnace solids. These need to be passed through a hydrocyclone to separate out a high-zinc fraction and also to remove residual chloride. Tata is committed to such a project and this will also benefit the sinter plant by helping to reduce particulate and other releases and negate the need to use the Betsi lagoon. There will be an update on this project at the CAPEX meeting scheduled for July 2015. Siting the hydrocyclone appropriately is a challenge but this is expected to be resolved shortly. Once more zinc has been removed, then more blast furnace solids should be able to be recycled.

Conveyor belts

NRW has received an enquiry about used/end of life conveyor belts being stored for extended periods of time within the steelworks. Tata explained that it is looking at how these belts can be recycled rather than landfilled. The reinforcement used in the belts affects how they can be recycled. Plastic or corded reinforcement allows easier recycling, but the use of steel reinforcement currently presents difficulties. Sometimes the recycler wants the belts rolled up whereas a different recycler may want them cut into 2-metre sections before collecting them. Tata are continuing to seek a recycling option and will:

- a) Estimate the quantity/tonnage of end of life conveyor belts they have on site; and
- b) Develop a plan for recycling and/or disposing of end of life conveyor belts.

NRW expects Tata to produce a plan by the end of August 2015 (see Action 1). We are supportive of Tata's efforts to recycle its end of life conveyor belts rather than dispose of them to landfill. This is consistent with the objectives outlined in Welsh Government's waste strategy for Wales (Towards Zero Waste) which emphasises increased recycling and the need to apply a 'waste hierarchy' to decisions on what option is best for a waste in Wales.

Strike update

At the time of our visit, Tata Steel had offered a modified pensions deal to its employees. Trade unions representing Tata Steel personnel had previously threatened to take industrial action over this issue. NRW understands that the Unions may recommend acceptance of the new deal, but the matter will go another ballot within the next month. The strike decision is therefore suspended until the outcome of the vote has been decided.

Conclusions and further actions required

Good progress has been made with regard to the steel (BOS) solids recycling and identifying a sustainable solution which can deal with current steelworks arisings. The challenge going forward is to get this approach embedded into the wider Tata Steel waste strategy and obtain 'buy-in' from other Tata installations in the UK and Europe. Dealing with the legacy material backlog may be more of a challenge that is dependent on Tata's management decisions on capital expenditure and operational costs.

Tata Port Talbot needs a plan to deal with its end of life conveyor belts that are currently stored on site pending recycling or disposal.

[END OF SECTION 2]

	EPR Compliance Assessment Report	Report ID: 5919
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) 13 July 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			
E5	N/A	Action 1: Tata Port Talbot needs a plan to deal with its end of life conveyor belts that are currently stored on site pending recycling or disposal. NRW officers are happy to visit site to review this plan with the relevant personnel.	31 August 2015

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**.