

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	2 July 2015	Time in	09.30 Out 13.30
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	22 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	N	
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	N	
c) General management	1. Staff competency/ training	A	
	2. Management system & operating procedures	A	
	3. Materials acceptance	N	
	4. Storage handling, labelling, segregation	A	
d) Incident management	1. Site security	N	
	2. Accident, emergency & incident planning	A	
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	A	
	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	N	
	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

The primary purpose of this visit was to discuss the current air quality situation in Port Talbot and to highlight poor air quality recorded during 2015 at the official AURN air quality monitor at Margam Fire Station and also the Prince Street monitor. The ongoing work by Tata to minimise PM₁₀ releases from the steelworks was scrutinised as part of the visit.

The number of PM₁₀ exceedance days has increased disproportionately at the AURN and Prince Street monitors across the second quarter of 2015. The Welsh Government's Short Term Action Plan (STAP) has been triggered in response to this situation. Managerial engagement is an action within the STAP, therefore senior NRW and steelworks personnel attended this intervention. A secondary aim of this visit was to review the Tata/NRW management interactions.

Person(s) present (Office based)

Tata Steel	Richard Leonard	NRW	Mary Youell
	Scott McKinnon		Mark Broom
	Fiona Abbott		Doug Cowie
	Claire Grainger		Paul Gibson
	Jason Heatman		
	Georgina Brooks		
	Iain McEwen (stock yard tower)		

Air Quality

Tata's representatives gave a presentation explaining how the company deals, manages and responds to air quality levels recorded in the Town. The presentation included details of Tata's capital investments specifically designed to improve air quality and also those key Industrial Emission Directive (IED) projects that also will improve PM₁₀ air quality around the site. Tata has systems in place for routine air quality awareness and air quality forecasts; its staff described Tata's alert communications used for air quality deteriorations in the Town and how they use local specific response plans to try to reduce Tata's impact on air quality. Tata's staff also explained their investigation process whenever there is an exceedance on the official AURN monitor at the Fire station.

Tata uses a range of electronic systems and displays to show real-time process and environmental data to its staff. One of the key displays in use across the steelworks is the air quality page that shows all the live internal and external PM₁₀ levels projected onto a map of the site. This display does not currently include the live results for the monitors at Little Warren and Prince Street, however Tata plans to introduce this capability soon. The inclusion of data for these monitors will help to raise awareness of these two locations - particularly Prince Street which is currently on 23 PM₁₀ exceedance days in 2015. This monitor is at risk of breaching the 35-exceedance day EU annual value. Highlighting real time data for Prince Street and Little Warren may allow Tata to adjust its site operations accordingly, allow rapid deployment of resources and hopefully reduce the risk of PM₁₀ exceedances occurring.

Figure 1 below shows an extract from the display screen used by Tata personnel. Little Warren is situated near the grey and white arrow in the top left hand corner.

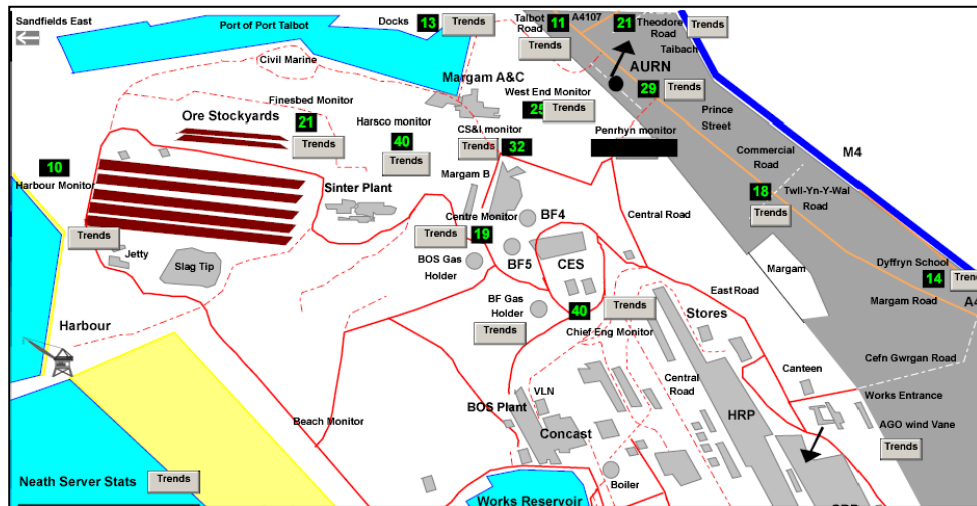
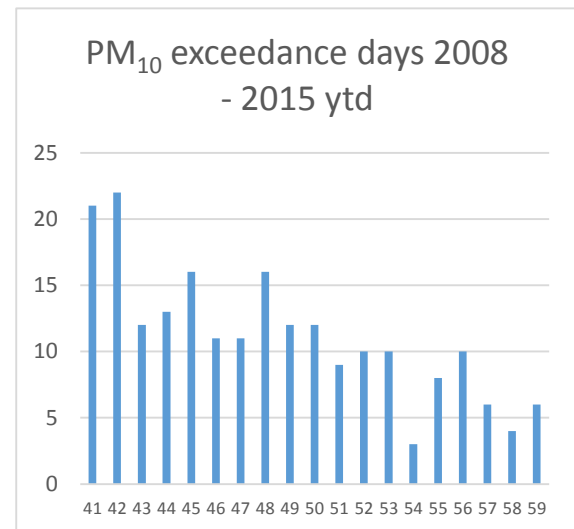
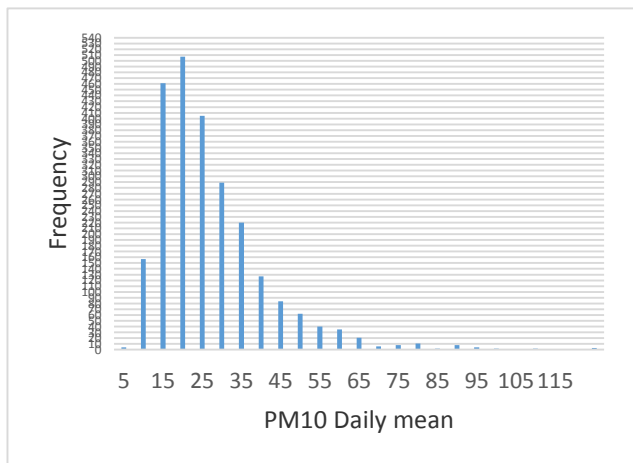


Figure 1: extract from real-time display screen used across steelworks

The distribution of PM₁₀ exceedance days was discussed. The graph on the left below shows the distribution of exceedance days at the AURN (Fire Station) monitor between 2008 and 7 July 2015. The graph on the right shows an expanded distribution around the 50 µg/m³ exceedance day concentration.



Looking at the distribution between 45 and 50 $\mu\text{g}/\text{m}^3$, there were on average 13 exceedance days between 2008 and 2015, whereas for the range between 51 and 56 $\mu\text{g}/\text{m}^3$ there were on average 8.3 exceedance days. This shows a substantial number of exceedance days which were fairly marginal breaches of the air quality standard.

Tata has four main projects ongoing this year in relation to air quality –

- 1 Ironmaking and GCI haul road improvements - £0.85M
- 2 Ironmaking ferrous stock house dust suppression - £0.73M
- 3 Fugitive dust in Steel and Slab - £0.75M
- 4 Fugitive dust suppression in the raw materials handling – £0.9M

These four projects are largely complete except for a trial on one conveyor in the raw materials area. The total cost of these projects is over £3M and a further £2+M is planned for next year. The further projects under consideration include -

- Further improvements in the ironmaking area
- Improvements to the site road network
- Dust suppression improvements at the sinter stock out area
- Purchase of more air quality monitors for use around the steelworks

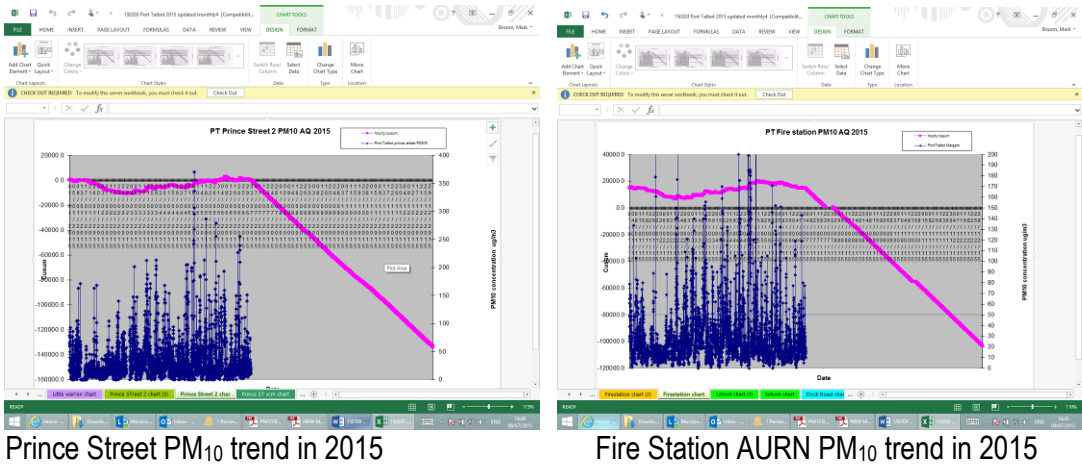
There are also substantial multi-million pound projects ongoing to achieve IED compliance e.g. BOS plant secondary fume extraction system upgrade. These projects should also contribute to reduced PM₁₀ levels across the site. Part of the BOS plant upgrade work is already complete for the Hot Metal Pouring Bay.

The previous week saw dry weather and the start of this week (w/c 29 June 2015) was also forecasted to be dry. Based on these weather forecasts, Tata decided to deploy water bowzers on a 24-hours a day basis and also asked Neath Port Talbot County Borough Council (NPTCBC) to sweep the new Harbour Way road running past the steelworks in an effort to minimise dust generation and propagation towards the PM₁₀ monitors around the Town. Tata's request to NPTCBC does raise an interesting point about when and how frequently Harbour Way is swept.

Tata has also re-communicated its messages about dust emissions from vehicle movements on site. Flyers have been issued to vehicle drivers and Tata's contractors. A 'billboard' or poster approach is something that is also being considered for 2016 with it being used on the major entrance bill boards – the campaign for 2015 has already been fixed, but the communication plan for 2016 is being prepared and its use before the critical period is a good idea.

In response to Tata's Fiona Abbott being seconded to India for three months, an employee from Tata Group Environment in Scunthorpe has been brought in to help with air quality interventions at Port Talbot. There is an automated air quality alert system being developed which could be of use to the steelworks and help with responses to poor air quality in the Town.

The PM₁₀ exceedance day total for Prince Street in 2015 stands at 23 days. This puts Prince Street at risk of failing the EU annual air quality standard. The trend for Prince Street is increasing against a decreasing trend for the Fire Station AURN.



NRW recommends that Tata uses its Operational Research Department to review the steelworks PI system to find out what data may have a relationship with the Prince Street monitoring information.

NRW notes with approval that since 6 June 2015 Tata has agreed to produce summary versions of its air quality exceedance reports for any exceedance days at the Prince Street monitor. These reports have normally only been generated for exceedances at the official AURN monitor. Tata will continue to generate these reports until the projected number of exceedance days during 2015 has returned within the 'green STAP' stage of Welsh Government's Short Term Action Plan.

NRW-Tata management interactions

There have been a number of personnel changes within Tata and NRW. These changes mean that the two organisations need to work out how best to interact across each other's management tiers. The table below outlines the various management and operational staff layers across both organisations:

Natural Resources Wales	Tata Steel (Strip Products UK)
Gareth O'Shea, Director South Wales	Stuart Wilkie, Hub (Site) Director
Mary Youell, Head of Operations – South West Wales	Scott McKinnon, HS and E Manager
Gavin Bown, Operations Manager	Richard Leonard, Environment Manager
Paul Gibson, Industry Regulation Team Leader – South West Wales	Fiona Abbott, Senior Environmental Engineer Jason Heatman, Lead Environmental Engineer
Mark Broom and Doug Cowie, Industry Regulation Team members and steelworks site inspectors	Claire Grainger, Environmental Improvement Engineer Georgina Brooks, Environment Engineer

Previously NRW arranged a series of regular meetings so that our managers could meet their Tata Steel counterparts ahead of any deteriorating air quality situation. Due to changes in both Tata and NRW, it has not been possible to maintain this approach; however these regular meetings may still be needed should the current air quality problems continue. NRW will suggest some dates for a future meeting between the Tata Steel Hub Director and NRW's new Director South Wales.

Stockyards tower visit

The raw materials control tower at the stockyards was inspected. The yard operations and the controls used to minimise air quality impacts were discussed. The photo below shows the work of the stockyard area being explained by a controller. One positive observation we noted was a front end loader being used to move pellets into a 'Euclid' hauler. These pellets were being transported to the lay-down area for use in the blast furnaces. The loader driver was, throughout the time NRW officers were present, loading in a manner that minimised the drop height from the loader's shovel. When not in use the loader was parked up waiting for the next Euclid to arrive. These actions show good behaviours to minimise fugitive dust and PM₁₀ releases.



Conclusions and further actions required

It was felt by both organisations that the visit served as a useful and open meeting regarding air quality. The importance of the Prince Street monitor was discussed and emphasised by NRW. Tata are able to make changes to their systems to display Little Warren and Prince Street real-time air quality data across the site. NRW recommends Tata uses its Operational Research Department to review the steelworks PI system to find out what data may have a relationship with the Prince Street monitoring information.

The interactions between Tata Steel and NRW management were reviewed and updated. NRW will propose some dates for a further meeting between the Tata Steel Hub Director and NRW's Director South Wales.

[END OF SECTION 2]

	EPR Compliance Assessment Report	Report ID: 5923	
This form will report non-compliance with your permit as determined by an NRW officer			
Site	Tata Steel Port Talbot steelworks	Permit	BL7108IM (as amended)
Operator/ Permit	Tata Steel UK Ltd	Date	22 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			
N/A		Recommendation: Tata could use its Operational Research Department to review the steelworks PI system to find out what data may have a relationship with the Prince Street monitoring information.	Review at Data Team Meetings
N/A		NRW to suggest dates for future manager-level meetings with Tata	November 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**.