

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	7 January 2015				Time in	14.00	Out	16.30
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		10 March 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	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

There are a number of major capital projects (CAPEX) that are needed to comply with a number of Iron and Steel Best Available Techniques (BAT) conclusions. This meeting reviewed progress with the CAPEX projects for the steel plant and the sinter plant, but focused mainly on the coke ovens gas desulphurisation project.

Person(s) present (Office based)

Tata Steel	Richard Leonard	NRW	Mark Broom
	Jason Heatman		Doug Cowie
	Fiona Abbott		
	Oliver Mullan (CO)		
	Tony Thomas (CO)		
	Stuart Lloyd (Sinter)		
	Wayne Lewis (BOS)		
	Andrew Jones (BOS)		

Steel plant secondary de-dusting and fume extraction

The preparatory work for this project has identified a number of areas for improvement. These include addressing de-dust system capacity and providing the electrical supply capability for a new fume extraction fan. A new travelling hood will also be provided for the Hot Metal Pouring (HMP) bay. The project is continuing in two phases and the CAPEX for Phase 1 is approved. Phase 2 is currently being reviewed as part of the CAPEX approval system. The project is on schedule, but costs have risen as the work gets better defined and specified.

NRW understands that both phases of the CAPEX project for the steel plant as a whole are needed to comply with BAT conclusion 78.

Sinter plant

The sinter plant CAPEX is split into four projects – lignite lime (and electrostatic precipitators [ESPs]), sinter de-dust, sinter cooler and hydro-cyclone.

1. Lignite lime and other improvements – the project is largely on plan, but costs have risen as further work has been identified to ensure that BAT-AELs (BAT-Associated Emission Limits) are met.
2. Sinter de-dust – a number of options have been assessed but it is likely that a new fan is required almost irrespective of the option chosen. The project is on plan but delivery times are tightening.
3. Sinter cooler – three suppliers are tendering for this work with CAPEX submission expected in March 2015 for final completion in Q4 2016. This project is largely on track.

4. Hydro-cyclone – looking at different delivery options including a third party operation on site. Tata is carrying out a hydro-cyclone trial at Scunthorpe steelworks to confirm the best approach. A sinter bed trial with no flue dust has been carried out around Christmas at Port Talbot but the results are awaited. The hydro-cyclone design is being scoped out but there are potential concerns over water requirements as previously noted in CAR 5785. It may be that the hydro-cyclones for Port Talbot may not be fully operational by March 2016, which could have consequential impacts on the need to store flue dust until the hydro-cyclones are fully available – hence the consideration of third party options.

Coke oven gas desulphurisation

There are two main desulphurisation options – either wet oxidation or ammonia/vacuum carbonate absorption followed by stripping. The wet process has been ruled out and the absorption/stripping option is being progressed not only at Port Talbot but at Scunthorpe who arrived at a similar conclusion independently. Two main technology suppliers have been actively involved and both companies and sites have arrived at very similar choices. Tata Port Talbot are now looking at reference plants for the chosen technology from each supplier.

In choosing where to go to see and review coke oven desulphurisation projects, sites of similar size, capacity and the existence of a retrofitted systems have been considered. Once again costs have risen and several delivery/contract options are being assessed. Both suppliers have included ammonia cracking (which releases hydrogen into the coke oven gas) but this does reduce the calorific value (CV) of coke oven gas by around 5%. However, ammonia cracking does offer the advantage of increasing gas quality and availability.

The de-tarring ESP upgrade project has also been approved, enabling the project to move ahead. There is likely to be additional work needed to upgrade the steelworks' utilities (power, water supply etc.) before the new desulphurisation plant can be brought online – this is part of a wider issue for Tata across the site. A potential construction location has also been identified adjacent to the existing by-products plant. Tata will consider the potential flood risk at this location as part of the project, however the project team should consult NRW for advice if required.

Tata are considering abstracting sea water for the cooling duties. Such an abstraction may need to be permitted but it depends on the status and classification of the water being abstracted.

The plan is for the desulphurisation project to come to fruition around Q4 2017 - Q1 2018 and Tata have applied for a derogation on that basis. NRW are considering this request.

CAPEX progress in summary

The CAPEX projects are progressing and Tata's thorough approach to ensuring that the projects have been appropriately scoped has found additional areas that need to be included in the project definitions. These changes have consequential impacts on costs but not so on delivery. All major projects are largely on track to meet either the March 2016 BAT compliance deadline or the derogated deadlines of December 2016 (for the de-dust project) and 2018 (for desulphurisation of coke oven gas).

The next quarterly CAPEX meeting is scheduled for **7 April 2015** at the steelworks.

Other matters

Waste

The hydro-cyclone project overflow may be in-scope material. Tata may have to tune the hydro-cyclones/cyclones to ensure that the overflow remains either out of scope or in-scope.

Use of recovered oil in the Coke ovens

Tata would like to arrange a separate discussion to help progress the use of recovered oil in the coke ovens and to move it forward within Wales. The inspecting officers will check and respond with their availability.

Draft consolidated environmental permit comments

A date has been agreed for a meeting (14/1/2015) to discuss and review Tata's comments on the draft reviewed and consolidated permit for its operations at Port Talbot.

[END OF SECTION 2]

	EPR Compliance Assessment Report	Report ID: 5795	
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	10 March 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			
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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**.