

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	15 May 2015	Time in	09.30 Out 15.30
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	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	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	A	
	3. Maintenance records	A	
	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

Tata Steel has reported a release of un-ignited Coke Oven Gas (COG) from the flare stacks at Morfa Coke Ovens. This event has qualified as a RIDDOR-reportable and COMAH-notifiable incident. The main purpose of this visit was to conduct a joint initial investigation with the Health and Safety Executive (HSE) to determine the root cause of this COG release and identify any associated safety and environmental concerns which need addressing to prevent a recurrence.

NRW officers also conducted an unannounced visit to the steelworks stockyards to visually assess the environmental performance of the installation.

Person(s) present (Office based)

Tata Steel	Scott McKinnon	NRW	Mark Broom
	Richard Leonard		Doug Cowie
	Isabel Vazquez	HSE	Alan Strawbridge
	Ian Goffon		Andrew Hall
	Peter Diplock		Peter Evans
	Lee Puckey		
	Craig Smith		

COG release 26 February 2015

On 26 February 2015 there was a problem with the flares at Morfa Coke Ovens which resulted in a release of un-ignited COG for up to 4 hours. Due to the amount of gas released this event was RIDDOR reportable and also notifiable under COMAH to the HSE. This event also falls under the EPR regime which is regulated by NRW. Rather than conducting two separate investigations (one under COMAH and a separate one under EPR), the initial investigation is combined. HSE will lead the investigation and if any EPR permit conditions are found to be breached, NRW's non-compliance assessment and scoring will be based on the contents of the final Tata Steel report into this event (compiled following HSE investigation). NRW will produce a further CAR report confirming its findings in due course.

A combination of office-based discussion and questioning and site inspection around the COG flare stack was undertaken and led by HSE inspectors. The area around the COG flare stack and condensate system was thoroughly examined.

One point of note in relation to air quality is the increase in carbon monoxide (CO) and sulphur dioxide (SO₂) levels recorded at Margam Fire Station monitoring station (AURN) at the time of the event. This observation may account for increases in these two pollutants that can be seen when analysing data for some PM₁₀ exceedance days in Port Talbot. The times when COG flaring occurs and also the times and duration of COG being vented are needed to help explain the levels of CO and SO₂ recorded at the Fire Station monitor during the early hours of 26 February 2015. A chart showing the levels of CO, SO₂ and Nitrogen Dioxide (NO₂) can be seen in Figure 1 overleaf.

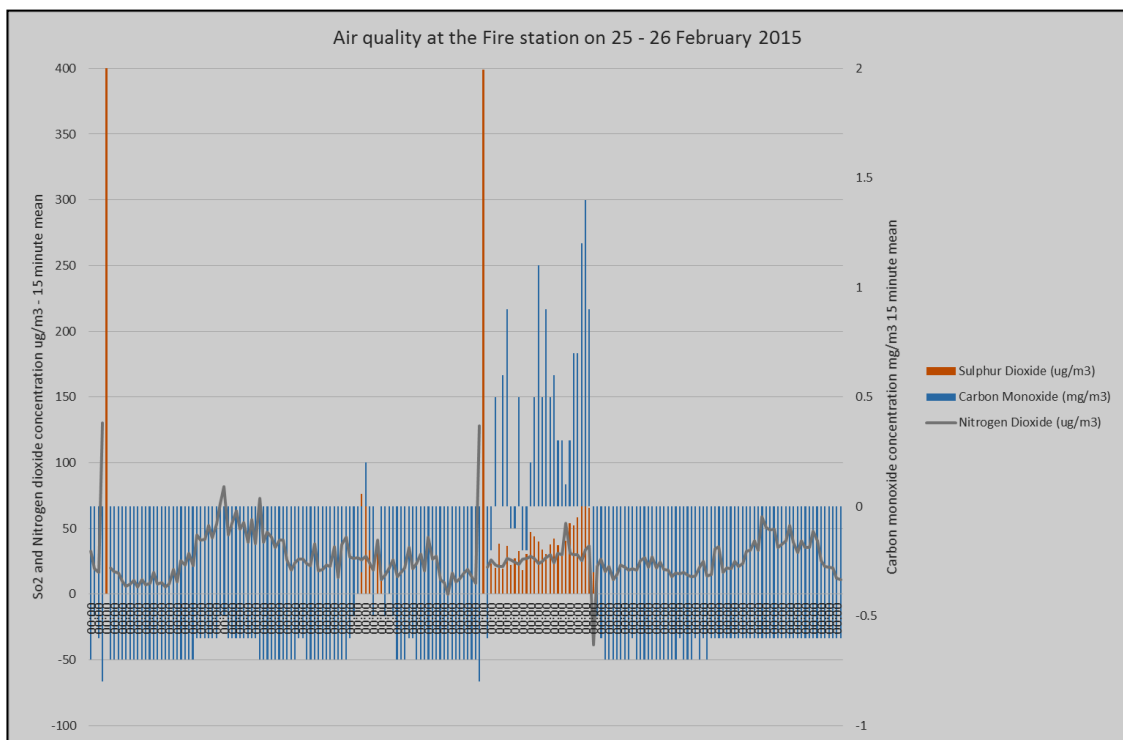


Figure 1: air quality at Margam Fire Station on 25 – 26 February 2015

While inspecting the flare and the associated condensate system, a number of 'black pushes' were seen emanating from the coke oven batteries. The operator explained that there are problems in the regenerator areas of the underfiring system serving the ovens at the ends of the batteries. Tata Steel has a plan to address this problem and to rebuild the regenerator parts of certain end ovens over the next year or so.

The water bowser for wetting the road ways and suppressing fugitive dust emissions was seen operating on the haul roads around Morfa Coke Ovens.

Fugitive dust release assessment (Stockyards inspection)

Following the inspection at the COG flare area, the steelworks was observed by NRW officers from the stockyards control tower. There was a sinter fines bed being started with no visible dust lift-off apparent. There was a ship offloading into yard 2 - again with no visible dust lift-off. A water bowser was seen wetting the roadways in the stockyards area and there was construction work ongoing on a new concrete road underway by the end of the rubble beds. Yards 1, 2 and 6 are now fully concreted and the concreting of yard 3 is in progress.

At least two 'black pushes' at the coke ovens were observed during the observation of the works from the tower. Our observation lasted approximately 30 minutes.



Sinter fines bed being started by the machine at centre-right



Ore being off loaded in the far left hand corner of Yard 2



Ship being off loaded and Yards 1&2 in the middle distance.
The road is being swept by the white vehicle.



A black push from the coke ovens.

Conclusions and further actions required

Based on Tata Steel's draft investigation report and the initial HSE investigation it became apparent that there were opportunities to prevent this COG release but these were missed. NRW will generate a further CAR report with its findings in relation to EPR permit compliance once the HSE investigation has been completed and Tata Steel's final investigation report is submitted.

The air quality information and the flaring and venting of COG does provide information that can help increase the understanding of PM₁₀ air quality exceedance days. The observations made from the stockyard control tower did confirm that there were a range of dust suppression measures being used and further work is under way to reduce PM₁₀ and fugitive dust releases. However there appears to be a recurring problem of black pushes at Morfa Coke Ovens. Although Tata Steel has a plan to address this problem, it will require further investigation and will be the subject of future compliance inspections.

[END OF SECTION 2]

	EPR Compliance Assessment Report	Report ID: 5881
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			
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**.